

Änderung der EU-Reifenkennzeichnungsverordnung (EU) 2020/740: **Praxistaugliche Vereinfachung und stärkere Digitalisierung der** **Reifenkennzeichnung**

Pirelli ist Mitglied im europäischen Branchenverbandes Tyres Europe und versendet ein aktuelles Positionspapier zur geplanten Anpassung der EU-Reifenkennzeichnungsverordnung (EU) 2020/740.

Tyres Europe begrüßt grundsätzlich das Ziel der Europäischen Kommission, die bestehenden Vorgaben zu vereinfachen und stärker zu digitalisieren. Mit dem beigefügten Papier bringt der Verband konkrete Änderungsvorschläge zum aktuellen Kommissionsvorschlag ein. Pirelli unterstützt die darin formulierten Positionen.

Die zentralen Anliegen von Tyres Europe:

1. Administrative Belastungen und zusätzliche EPREL-Anforderungen begrenzen

- Tyres Europe spricht sich gegen eine Ausweitung der Produktinformationen und technischen Dokumentationspflichten in EPREL aus, sofern diese über die für die Identifizierung des Reifens und den Nachweis der Label-Parameter erforderlichen Angaben hinausgehen.
- Insbesondere sollen keine zusätzlichen technischen Parameter oder Testberichte aufgenommen werden, die aus Sicht der Industrie keinen zusätzlichen Nutzen für Verbraucher:innen oder die Marktüberwachung bieten.
- Vor dem Hintergrund der parallel laufenden Arbeiten an den Ökodesign-Anforderungen im Rahmen der ESPR fordert der Verband, weitere Dokumentationsanforderungen in EPREL zunächst zurückzustellen, um zusätzliche bzw. sich überschneidende Anforderungen zu vermeiden.

2. Reifenkennzeichnung konsequent digitalisieren

- Tyres Europe unterstützt eine stärkere Digitalisierung und fordert, dass das Reifenlabel künftig neben dem physischen Aufkleber auch in digitaler Form bereitgestellt werden kann.
- Auch das Produktinformationsblatt soll digital zur Verfügung gestellt werden können.
- Bei Katalogen und technischen Werbematerialien soll eine vereinfachte digitale Darstellung der relevanten Labelklassen ermöglicht werden, insbesondere dort, wo auch der Preis angezeigt wird.

3. Bestehende Verantwortlichkeiten nicht unnötig ausweiten

- Tyres Europe spricht sich dagegen aus, die Verpflichtungen aus der Reifenkennzeichnung auf reine Reifenmonteure („tyre fitters“) auszuweiten.
- Nach Auffassung des Verbandes erbringen diese in erster Linie eine Dienstleistung und haben keinen unmittelbaren Einfluss auf die Kaufentscheidung.
- Betriebe, die neben der Montage auch Reifen verkaufen, sind bereits als Distributoren von den bestehenden Vorgaben erfasst, sodass Tyres Europe hier keinen Bedarf für zusätzliche Verpflichtungen sieht.

4. Ausgewogene Weiterentwicklung der Reifenkennzeichnung sicherstellen

- Tyres Europe spricht sich dagegen aus, künftige Änderungen etwa an Label-Anforderungen, Test- und Berechnungsmethoden oder Klassengrenzen ohne entsprechende Einbindung der Co-Gesetzgeber vorzunehmen.
- Der Verband verweist darauf, dass Eigenschaften wie Rollwiderstand, Nasshaftung und Geräuschentwicklung miteinander sowie mit weiteren Reifeneigenschaften zusammenwirken und daher nicht isoliert betrachtet werden sollten.
- Änderungen sollten deshalb die Auswirkungen auf Sicherheit, Umweltperformance, Produktentwicklung, Investitionsentscheidungen und Wettbewerbsfähigkeit gleichermaßen berücksichtigen.

TYRES EUROPE AMENDMENTS ON THE TYRE LABEL REGULATION OMNIBUS - Amendments to Regulation (EU) 2020/740

Amendment 1

Proposal for a regulation

Article 2(4)(a) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

the title is replaced by the following:
‘Obligations of tyre distributors and tyre fitters’;

Amendment

the title is replaced by the following:
‘Obligations of tyre distributors ~~and tyre~~
fitters’;

Justification

Expanding the scope of obligations to tyre fitters in the context of the tyre label does not add significant benefits while creating new hurdles and challenges for the industry. Moreover, tyre fitters offer a service that does not influence the purchasing choice of the user. When shops that offer the service of tyre fitter also sell tyres, in that case they fall into the definition of distributor and are therefore already covered by the current version of the Regulation.

Amendment 2

Proposal for a regulation

Article 2(1)(26) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

‘tyre fitter’ means a natural or legal person who is responsible for the correct and safe fitting and setting up of tyres on vehicles.’;

Amendment

Delete

Justification

Expanding the scope of obligations to tyre fitters in the context of the tyre label does not add significant benefits while creating new hurdles and challenges for the industry. Moreover, tyre fitters offer a service that does not influence the purchasing choice of the user. When shops that offer the service of tyre fitter also sell tyres, in that case they fall into the definition of distributor and are therefore already covered by the current version of the Regulation.

Amendment 3

Proposal for a regulation

Article 2(3) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

Amendment

in Article 5, paragraph 1 is replaced by the following: 1. Suppliers shall enter the information set out in Annex III and in Annex VII into EPREL before placing on the market a tyre produced after that date. A link to that information shall be provided along with the label.’;

Delete

Justification

Mandating an extended information sheet exponentially increases administrative and documentation burdens without delivering clear, actionable benefits to end-users or market surveillance authorities.

The European Commission’s own empirical studies demonstrate that overall public engagement with the EPREL database remains below 10%. Crucially, direct consumer usage drops to a mere 5%. Consequently, there is no solid empirical or scientific basis to indicate that adding further data fields or requirements to EPREL will yield any measurable positive results or value for European consumers.

To avoid unnecessary administrative burden on suppliers as well as information overload for consumers, the product information sheet should contain information required for tyre identification and for performance documentation of label parameters as defined in Regulation (EU) 2020/740. In the spirit of simplification, no additional items should be added, specifically

- *no addition of RR coefficient value, WG index value and external rolling noise level*
- *no addition of additional parameters not relevant for compliance verification*

Second, beyond the overall burden, several proposed fields raise technical consistency concerns. This is notably the case for information related to UN type approvals and UN regulations in a labelling database, the categorisation of M+S tyres as a sub-category of special-use tyres, RRC and wet grip values, half-worn wet grip index for C3 tyres which is a complete new performance, and tread depth without indicating how to measure it.

Amendment 4

Article 2(7) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

Amendment

Annex III is replaced by the text in Annex I to this Regulation;

Delete

Justification

Mandating an extended information sheet exponentially increases administrative and documentation burdens without delivering clear, actionable benefits to end-users or market surveillance authorities.

The European Commission's own empirical studies demonstrate that overall public engagement with the EPREL database remains below 10%. Crucially, direct consumer usage drops to a mere 5%. Consequently, there is no solid empirical or scientific basis to indicate that adding further data fields or requirements to EPREL will yield any measurable positive results or value for European consumers.

To avoid unnecessary administrative burden on suppliers as well as information overload for consumers, the product information sheet should contain information required for tyre identification and for performance documentation of label parameters as defined in Regulation (EU) 2020/740. In the spirit of simplification, no additional items should be added, specifically

- *no addition of RR coefficient value, WG index value and external rolling noise level*
- *no addition of additional parameters not relevant for compliance verification*

Second, beyond the overall burden, several proposed fields raise technical consistency concerns. This is notably the case for information related to UN type approvals and UN regulations in a labelling database, the categorisation of M+S tyres as a sub-category of special-use tyres, RRC and wet grip values, half-worn wet grip index for C3 tyres which is a complete new performance, and tread depth without indicating how to measure it.

Amendment 5

Article 2(8) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

Amendment

Annex IV amended in accordance with
Annex II to this Regulation;

Delete

Justification

Mandating an extended information sheet exponentially increases administrative and documentation burdens without delivering clear, actionable benefits to end-users or market surveillance authorities.

Amendment 6

Article 2(9) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

Amendment

Annex VII is amended in accordance with
Annex III to this Regulation

Delete

Justification

Requiring an expanded list of technical documentation to be uploaded into the EPREL database significantly raises compliance costs, even if the requirement was not retroactive. As the Commission is currently working on ESPR, the tyre manufacturers call for a halt on requests to add additional documents to the EPREL database until the work on ESPR has been completed.

Specifically, extension of information requirements for the compliance part database of the Product Information Sheet as foreseen under the Annex III in the Commission proposal, as well as the integration of test reports of tyres should be removed, because of administrative and disproportionate burden this will create. In addition, uploading type approval document is not needed for documentation of label grade, considering that the test procedure for compliance testing is clearly described, and full documentation is available on demand should questions occur during a particular testing campaign.

Amendment 7

Article 2(4)(e) of Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

‘4. In catalogues or technical promotional material, where displaying the full label is not possible or advisable, the rolling resistance, the wet grip and the noise classes may be shown by the means of a simplified label format with nested display consisting of class arrows including the applicable ranges as set out in Annex IV and directly giving access to the complete label.’;

Amendment

‘4. In catalogues or technical promotional material, where displaying the full label is not possible or advisable, the rolling resistance, the wet grip and the noise classes may be shown by the means of a simplified label format ~~with nested display~~, **where price is displayed**, consisting of class arrows including the applicable ranges as set out in Annex IV and directly giving access to the complete label.’;

Justification

To ensure a full digitalisation of the tyre label, and a significant simplification for the tyre industry, we propose the changes as shown above. This would ensure that the tyre label can be provided in digital format, and under conditions where price is displayed.

Amendment 8

Article 2(6) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

‘Article 13 is amended as follows:
Paragraph 1, point (b), is replaced by the following: ‘(b) Annexes I, II, III, IV, V, VI and VII, by adapting the values, calculation

Amendment

Delete

methods and requirements set out therein to technological or market developments or to ecodesign information requirements set out in delegated acts adopted pursuant to Regulation (EU) 2024/1781’;

Justification

The proposed amendment of the EC should be rejected because it removes the power of the co-legislators to engage and oversee potential changes to the tyre label. Tyres are safety-critical components of vehicles enabling mobility, and as such their performance cannot be assessed through one parameter in isolation. Rolling resistance, wet grip, noise interact with each other and with many other non-regulated tyre performances. Changes to the label, test methods, calculation methods, requirements or class boundaries can therefore affect product design choices, investment decisions and the balance between safety, environmental performance and competitiveness

Amendement 9

Article 2(2) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

Text proposed by the Commission

for each individual tyre, by a tyre label, in the form of a sticker, that complies with the requirements set out in Annex II, indicating the information and class for each of the parameters set out in Annex I, and by a product information sheet;

Amendment

for each individual tyre, by a tyre label, in the form of a sticker **or digital format**, that complies with the requirements set out in Annex II, indicating the information and class for each of the parameters set out in Annex I, and by a **digital** product information sheet;

Justification

To ensure a full digitalisation of the tyre label, and a significant simplification for the tyre industry, we propose the changes as shown above. This would ensure that the tyre label can be provided in digital format, and under conditions where price is displayed.

Amendement 10

Article 11 (2) of the Proposal amending Regulation 2020/740 as regards simplification and better use of digital options for energy and tyre labelling

*Where Member States provide incentives with regard to tyres, such incentives shall target only tyres ~~in class A or B with respect to rolling resistance or wet grip~~ **in the two highest populated classes** with respect to rolling resistance **and** wet grip within the meaning of Parts A and B of Annex I, respectively, **and selected by tyre dimension and properties (the tyre that could be actually fitted on the vehicle), as can be verified from the Energy Product Registry for Energy Labelling (EPREL).** ~~Taxation and fiscal measures shall not constitute incentives for the purposes of this Regulation.~~*

Justification

*The legislation on the Tyre Label should be aligned with the framework legislation on the Energy Label, regarding the incentives that Member States may provide for better rated products. **The changes to the original text will provide Member States with greater flexibility to design incentives that effectively promote the uptake of better-performing tyres, while recognising that certain tyre types may not be able to attain the highest label classes.** The amendment would also ensure that taxation and fiscal measures are not inadvertently excluded as potential tools to encourage the uptake of more efficient and safer tyres, particularly in light of forthcoming EU initiatives. The proposed amendment is also in line with the text referring to tyres under [Taxonomy Regulation](#) – this is particularly important to ensure consistent references across different pieces of legislation.*
