6. Februar 2026

Stellungnahme zur UNECE Arbeitsgruppe Geräusch und Reifen (GRBP) am 10.02.2026: Einführung EURO7 Pkw Reifen Abriebgrenzen

In oben genannter Angelegenheit übersenden wir beiliegende Stellungnahme des Europäischen Reifenverbandes Tyres Europe mit der Bitte um entsprechende Berücksichtigung. Das Kernanliegen haben wir unten kurz zusammengefasst.

Unser Anliegen: Die UNECE Arbeitsgruppe Geräusch und Reifen (GRBP) wird sich u.a. mit den Testmethoden für Reifenabrieb und den Grenzwerten (siehe unten) befassen.

Wir bitten, sich für die Verabschiedung der von der European Tyre and Rim Technical Organisation (ETRTO) vorgeschlagenen gestaffelten Grenzwerte, einzusetzen. Im Sinne der Klarheit und Rechtssicherheit, sollten die Zulagen im Haupttext der Verordnung verankert werden.

Begründung: Für bestimmte Reifenkategorien - insbesondere Winterreifen, Reifen mit hohem Lastindex (XL und HL) sowie Ultra-High-Performance-Reifen - sind gezielte Zulagen erforderlich, anderenfalls sind negative Auswirkungen auf Sicherheit und Verfügbarkeit (insbes. Anforderungen der Elektromobilität) zu befürchten. Der Ansatz ermöglicht belastbare Umweltergebnisse, ohne sicherheitsrelevante Eigenschaften wie Nass-, Trocken- und Schneehaftung zu beeinträchtigen, und bleibt zugleich praxistauglich sowie industriell umsetzbar.

Eine Vorgabe, die über die von der ETRTO vorgeschlagenen Grenzwerte hinausgeht, würde dazu führen, dass nur wenige europäische Unternehmen am Markt bestehen könnten, was nicht im Sinne der Wettbewerbsfähigkeit der europäischen Reifenindustrie sein kann. Die Produktions- und Entwicklungskosten in Deutschland liegen bereits deutlich über denen des internationalen Wettbewerbs, insbesondere im Vergleich zu asiatischen Standorten. In jüngster Vergangenheit haben Wettbewerber bereits Produktionsstandorte in Deutschland schließen müssen. Ein ausgewogenes Maßnahmenpaket verhindert eine weitere Vergrößerung der Kostenlücke, wirkt einer fortschreitenden Deindustrialisierung entgegen und stärkt Deutschland als Produktions- und Forschungsstandort.

Pirelli setzt auf den Industriestandort Deutschland und bittet sich entsprechend für realistische Grenzwerte einzusetzen.

Darüber hinaus hat die Europäische Kommission im Zuge der laufenden Verhandlungen über die Prüfmethoden einen Äquivalenzansatz vorgeschlagen, der die Anwendung sowohl von Straßenabriebs- als auch von Trommelprüfverfahren in geschlossenen Räumen ermöglicht. Obwohl das Ziel, beide Methoden beizubehalten, geteilt wird, wirft der vorliegende Vorschlag eine Reihe ungeklärter Fragen auf, die über technische Details hinausgehen und direkte Auswirkungen auf Fairness, Umsetzbarkeit innerhalb des Euro-7-Zeitplans, technische Robustheit und Verhältnismäßigkeit hinsichtlich Prüfaufwand und verfügbarer Kapazitäten haben. Aus Sicht der Industrie sind diese Prinzipien unerlässlich und sollten die Grundlage jeder endgültigen Lösung bilden, die die Anwendung beider Prüfmethoden ermöglicht, um eine zeitnahe Umsetzung, regulatorische Glaubwürdigkeit und effektive Durchsetzung zu gewährleisten.

A Balanced Approach for C1 Tyre Abrasion Limits and Test Method

The Tyre Industry's Position – Executive Summary

Context

• **Timeline**: The establishment of C1 (passenger car) tyre abrasion limits is under discussion in the UNECE Working Party on Noise and Tyres (GRBP) and a decision on C1 tyres needs to be taken in February's meeting.

• **What is being discussed**: A decision needs to be taken on the limits for C1 tyres, their phased tightening over time, the allowances needed for specific tyres and the testing methods allowed for the type approval of C1 tyre abrasion.

• **Competitiveness check**: while abrasion requirements will apply equally to all tyres placed on the EU market, European tyre manufacturers face structurally higher production costs than competitors in other regions, which limits their ability to absorb the additional development and industrialisation costs associated with over-ambitious requirements.

Industry Proposal

• Acceptance of the proposal by the UNECE GRBP Task Force Tyre Abrasion (TFTA) Co-chairs of a two-stage introduction of abrasion limits: Stage 1 (Year 0) and Stage 2 (after 5 years).

• Balanced approach between environmental benefits and realistic technology evolution.

• Allowances for specific tyre categories to preserve safety and consumer choice.

• On the test methods the tyre industry supports both outdoor open-road and indoor drum methods, with a "transfer function" safeguard for consistency between them, to be reviewed over time. A provisional, conservative inter-method alignment factor will safeguard against uncertanties due to the methods variability and will be progressively improved as methodological accuracy improves.

Why This Approach Works

• **Environmental impact**: the removal rates of the industry proposal(the tyres that would be removed from the market and redesigned) are significant and higher than other regulated tyre performances when they were first introduced. The industry proposal will lead to a progressive phase-out of approximately 37% of lower-performing products over a five-year period. Stricter limits would only bring Marginal environmental gains (~2–3%) combined with exponential high industrial and consumer costs.

• **Consumer choice and safety**: stricter limits would reduce the product range offered by European manufacturers, resulting in less choice, higher prices, and potential safety trade-offs as well as the discontinuation of niche tyres.

• Re**gulatory credibility**: Dual test methods ensure enforceability, efficiency and sustainability.

Call to Action

• The European tyre manufacturing industry calls on the Contracting Parties to support agreement at GRBP 83 on staged abrasion limits, category-specific allowances, and balanced test methods implementation.

• This ensures timely Euro 7 delivery, environmental objectives, and industry competitiveness.

Position of the European Tyre Industry on Tyre Abrasion Limits

Introduction

The European tyre manufacturing industry supports the introduction of performance requirements on tyre abrasion and has invested significant resources to make them possible. Manufacturers have jointly developed and assessed tyre abrasion using both open-road vehicle and indoor drum test methods, and completed a wide, resource-intensive market assessment to quantify realistic removal rates. Building on this work, the industry argues for an ambitious yet feasible package that delivers measurable reductions in abrasion, safeguards road safety and consumer choice, and preserves Europe's industrial competitiveness.

This proposal reflects a majority industry view and represents the maximum level of ambition that can realistically be achieved if all elements are adopted together as a coherent package.

Overview of industry position

1. **The urgency of achieving an agreement in the 83rd session of the Working Party on Noise and Tyres (GRBP)**

Reaching agreement at the February session of the UNECE GRBP is critical to ensure a coherent and timely implementation of Euro 7 tyre abrasion requirements.

- **UN Regulation provides the only effective framework for a global** industry such as tyres: agreeing at UN level avoids regulatory fragmentation and the risk that different regions develop divergent limits and test methods, undermining environmental effectiveness and increasing compliance costs.
- **An early decision is essential to allow sufficient time for implementation**, including the establishment of type-approval procedures, the designation of Type Approval Authorities, and the accreditation of testing laboratories and technical services, all within the particularly demanding Euro 7 timeline.
- **Agreement in February does not preclude further refinement**: the adopted framework will be progressively consolidated through the 2026 workplan of the Task Force on Tyre Abrasion (TFTA), which will address technical improvements and updates as needed.
- And finally**, providing early regulatory certainty is key to enabling manufacturers and authorities to plan investments**, resources and testing capacity, ensuring that Euro 7 objectives are delivered effectively rather than delayed by procedural bottlenecks.

2. The limits/timeline/allowances package

The table below summarises the industry proposal on tyre abrasion limits, including staged values, category-specific allowances and the corresponding redesign rates, demonstrating how ambitious reductions can be delivered within the Euro 7 timeline in a proportionate and enforceable manner.

Industry limits proposal (vehicle method)

	Core limit	Stage 1			Stage 2****			EU Market share***
		co-chairs proposal TFTA WD	co-chairs new proposal 5/9	ETRTO*	co-chairs proposal TFTA WD	Co-chairs new proposal 5/9	ETRTO*	
Margin by tyre category of use								
Normal	1,0	[0,2]	0,22	0,25	[0.15]	0,12	0,15	
Snow	1,0	[0,2]	0,22	0,25	[0.15]	0,12	0,15	
Special use		[Not defined]	[Not defined]	[exempted]	[Not defined]		[exempted]	0,7%
Allowances for specific tyre groups								
Tyre for use in severe snow conditions (3PMSF)		+0.10	+0.10	+0.10	[+0.10]	+0.10	+0.10	35,0%
Reinforced or extra load tyre (XL)		+0.10	+0.10	+0.10	[-]	+0.10	+0.10	~50%
Tyres with a nominal aspect ratio ≤ 40 and suitable for speeds ≥ 300		+0.10	+0.10	+0.10	[-]	+0,05	+0.10	7,2%
[Tyres with low load index (LI < 77)]		+0.10	+0.10	+0.10	[-]	+0,05	+0.10	< 2% (decreasing trend)
COP		0,2	0,25	0,25	0,2	0,25	0,25	
removal rate		32%	29%	23%	44%	42%	36,5%	
removal rate between stages 1 and 2					12%		13,5%	
emission reduction (**)		~11%	~11%	~8%	~15%		~12%	

* Not endorsed by a tyre manufacturer
** Estimation based on JRC assumptions
*** based on ETRMA EUROPOOL
**** for stage 2 and it should be 5 years between the 2 stages

Its feasibility depends on adopting all elements together and maintaining them across both stages.

2.1. Two stages, five years apart.

- The proposal is coherent with tyre technical development cycles and consistent with other UN tyre regulations.
- It provides sufficient time for redesign, validation and industrial adaptation.

2.2. Quantified removal rates.

The proposed limits correspond to quantified removal rates, i.e. the share of tyres currently on the EU market that would no longer comply with a given abrasion limit and would therefore need to be redesigned or withdrawn.

- Stage 1: 23% removal rate;
- Stage 2: overall 36.5% removal rate.

These levels go beyond the first steps taken when other tyre performances (rolling resistance, wet grip) were initially regulated.

2.3. Allowances for defined categories.

Targeted allowances are proposed for specific tyre categories with structural characteristics—such as winter tyres, high-load tyres and ultra-high-performance tyres—that lead to systematically different abrasion behaviour under testing.

These allowances are necessary to avoid unintended safety or availability impacts, and should be integrated in the main text of the Regulation to ensure clarity and legal certainty across both stages.

It is noted that proposals to remove certain allowances in the second stage would affect tyre categories representing only a very limited share of the EU market, while creating disproportionate disruption for highly specific applications without delivering commensurate environmental gains.

2.4. Test methods and correlation.

Both open-road vehicle and indoor drum test methods are currently being developed and assessed, and the Regulation must address the use of both methods while ensuring that their application leads to consistent compliance outcomes.

- Market assessment in 2024 using both open-road vehicle and indoor drum methods shows that a correlation between the two methods exists, but that it is currently not sufficiently robust and requires further work.
- The industry-supported solution therefore entails the introduction in the UN Regulation of a **technically conservative transfer function**, defined as a regulatory adjustment coefficient applied to indoor drum test results to ensure consistent compliance outcomes between the two method.
- In practice, this transfer function would act as a variability margin applied to drum test results and limits the risk of inversions of compliance outcomes during type approval, i.e. situations where tyres could be assessed as compliant using one method while not being compliant when assessed using the other. This approach applies until the indoor drum method is further described and a more robust transfer function can be properly assessed, as foreseen in the 2026 workplan of the Task Force on Tyre Abrasion (TFTA).
- **Within this framework, the European tyre industry supports the application of a conservative transfer function coefficient of 1.5 for the indoor drum method**. This coefficient is intended to prevent situations where tyres that would **not** comply when assessed using the open-road vehicle method could pass instead the indoor drum testing. At the same time, the selected value is designed to avoid an excessive number of false negative outcomes, whereby tyres that would be compliant with the road method could be unduly excluded when assessed with the drum method. The value of 1.5 therefore represents a balanced and precautionary approach, identified on the basis of quantitative analyses of the available test data (see the table below).
- The workplan 2026 aimed to lead to a new Regulation supplement in September 2026. This would also assess the correlation of the two improved methods and will consequently also bring to a new Transfer Function's update.

scenario	Gain = 1.5 (AIDrum Final – 1) = 1.50 x (AIDrum Measured – 1)
drum results	
1	**1**
1,05	**1,075**
1,1	**1,15**
1,15	**1,225**
1,2	**1,3**
1,25	**1,375**
1,3	**1,45**
1,35	**1,525**
1,4	**1,6**
Inversion Risk	**5,40%**
rejection risk of good tyres	**11,80%**

Why This Proposal Is the Right Outcome for Europe

1. **Environmental performance.**
   - The proposal delivers significant reductions in tyre abrasion in support of the EU's microplastic emission reduction objectives.
   - The difference in overall emission reduction between this proposal and the co-chairs' higher removal rates is modest (≈3 percentage points in Stage 1; ≈2 percentage points in Stage 2).
2. **Safety and consumer mobility.**
   - Tyres are safety-critical products. Certain categories cannot meet lower thresholds without compromising essential requirements.
   - Whilst limited independent testing (e.g. the ADAC tyre ranking study) has so far shown no clear tradeoffs between abrasion and wet grip.Tyres cannot yet be optimised simultaneously for all performances. If regulation requires redesigning tyres primarily to minimise abrasion, this may come at the expense of other critical performances, including safety. Until now, consumers have been able to choose products based on their own priorities — for example, favouring safety or rolling resistance. A regulation that forces optimisation for abrasion risks narrowing these choices. More importantly, the full consequences for safety performance are not yet known and may only become apparent once the transition has already taken place.

3. **Predictability and regulatory coherence.**
   - A five-year interval between stages reflects real-world development cycles for tyres and vehicles.
   - This mirrors other UN tyre regulations and gives manufacturers legal certainty to invest, redesign, and industrialise responsibly.
4. **Competitiveness and resilience.**
   - European production costs are already significantly higher (around double than those in Asia and one-third more than in the US).
   - A balanced package avoids widening the cost gap, prevents further de-industrialisation, and sustains Europe's manufacturing and R&D base.

The solution identified to allow the use of both the outdoor open-road and indoor drum methods offers the following benefits:

- In line with the EU simplification agenda, it limits regulatory complexity and avoids the need to establish specific governance arrangements to manage equivalence between test methods and testing facilities.
- It ensures that tyres type-approved using the indoor drum method will also be compliant when assessed with the outdoor vehicle (open-road) method.
- It allows for further technical improvements within the existing implementation timeline, by updating the transfer function on the basis of the 2026 workplan through a new supplement to UN R[XXX].

Consequences of More Stringent Limits

More stringent tyre abrasion limits than those proposed by the industry would have disproportionate impacts relative to the limited additional environmental benefits they would deliver.

- **Product redesign/withdrawal**: almost one in two tyres on today's market would need to be redesigned or withdrawn by Stage 2; this is particularly acute for winter applications, with potential consequences for road safety.
- **Escalating development costs**: re-engineering expenses would rise sharply, especially for Original Equipment (OE) tyres. OE development cycles are longer, vehicle-specific and involve extensive validation, often costing over ten times that of replacement tyres.
- **Portfolio shrinkage and consumer choice**: niche, regional or special-use tyres risk discontinuation, reducing consumer choice and potentially affecting safety in specific conditions.
- **Distorted competition**: if only a small set of tyre designs or a few manufacturers can consistently meet stricter limits, competition would narrow, with negative effects on prices, quality and safety.
- **Price pressure**: increased development and industrialisation costs would pass through to consumers and fleets.

- **Competitiveness loss and industrial risk**: Europe's tyre sector is transforming under unprecedented cost pressure and global competition. Production costs in Europe are around double those in Asia and roughly one-third higher than in the US. EU-based production has been losing ground year after year, import penetration is rising, and several plants have already closed. In this context, regulatory ambition must be calibrated to feasibility and the pace of implementation to safeguard industrial sustainability and competitiveness. Some may argue that higher performance thresholds create a "ticket to entry" that filters out lower-quality tyres. In reality, manufacturers in markets with much lower production costs can absorb development expenses more easily and quickly redesign tyres to meet regulatory requirements. By contrast, European producers face structurally higher costs, making them disproportionately exposed to over-ambitious targets. The proposal must therefore be ambitious, but not excessive — delivering real environmental progress without penalising Europe's industry.

Test Methods: outdoor open-road and indoor drum as essential complementary testing strategies

The industry recognises the open-road vehicle method as the historical reference for abrasion measurement. However, relying exclusively on this approach would create **long-term** challenges:

Environmental impact: road tests themselves generate Tyre and Road Wear Particles (TRWP), contradicting the very objective of reducing emissions.

The order of magnitude for the open road vehicle testing is approximately 2500 kg/year for testing C1 tyres in Europe for type approval and COP testing.

Economic burden: road testing is expensive (around 15.000 euro/tyre type approval test), resource-intensive and climate condition dependant, adding unnecessary compliance costs for manufacturers.

Capacity and repeatability: exclusive reliance on road campaigns would make routine checks more cumbersome and limit throughput, especially as the regulation matures.

Allowing a validated indoor drum method will ensure that compliance remains credible, efficient and consistent with sustainability goals. It also provides a practical tool for ongoing surveillance and innovation, strengthening rather than weakening the robustness of the framework.

Call to Action

Contracting Parties are invited to support agreement at the February session of the Working Party on Noise and Tyres (GRBP) on the proposed UN Regulation on tyre abrasion, including the staged limits, defined allowances and the framework for the use of open-road and indoor drum test methods. Reaching agreement at this stage is essential to maintain the Euro 7 timeline, enable timely preparation by authorities and industry, and provide a stable regulatory basis that can be further refined through the 2026 workplan of the Task Force on Tyre Abrasion. This approach ensures credible environmental outcomes while preserving safety, enforceability and industrial feasibility.