





MSTyr15

WP5 Inspection and testing tyres

30 May 2018
Brussels







Inspections per Member Country

Belgium	221
Bulgaria	900
Croatia	536
Estonia	258
Finland	1080
Germany	1238
Ireland	1080
Latvia	976
Lithuania	582
Luxembourg	501
Poland	1111
Romania	700
Spain	744
Sweden	1068
Turkey	1246
Total	12241

2888 (23,5%) tyres were inspected by analysis of the websites

73% summer tyres

27% winter tyres





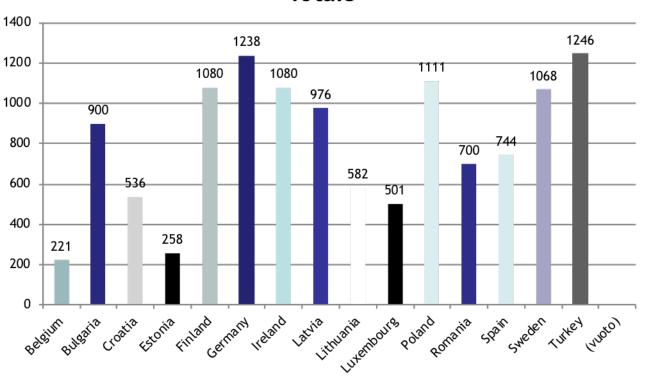






Inspections per Member Country









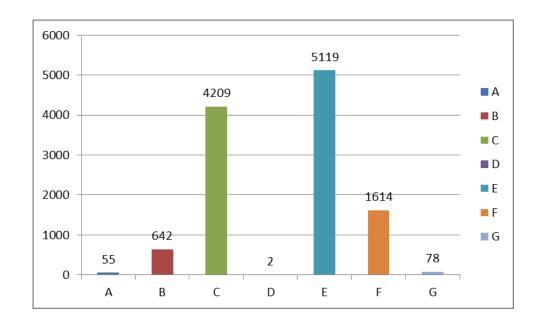


Tyres inspected per RR Class

Α	55
В	642
С	4209
D (*)	2
E	5119
F	1614
G	78

In one case class D is declared. It is a studdable tyre, Regulation is not applicable. For other case the relevant Authority is

checking



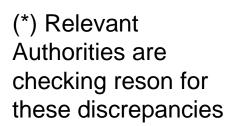


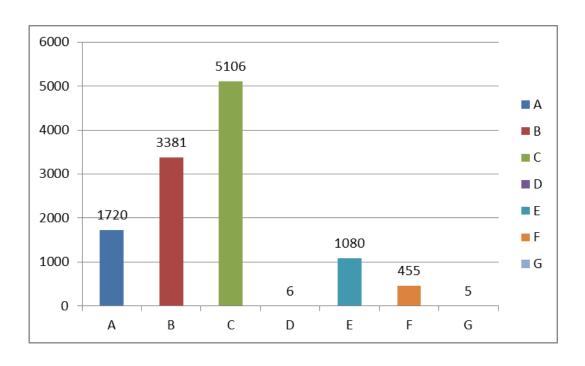




Tyres inspected per WG Class

A	1720
В	3381
С	5106
D (*)	6
E	1080
F	455
G (*)	5











Inspections results

- Inspections on web: 627 non compliant
 In 385 cases no label shown
 Other non conformities: no link to Commission website (160), missing explanation of pictograms (21), faulty information (92)
- Inspections on shops: 568 non compliant
 In 109 cases no label shown
 Other main non conformities: no label shown (69), wrong label format (319), label incomplete (69), label not easily visible (28)







Verification of label

- Main problems
 - Incorrect or missing data
 - Label missing or not shown
 - Non correct label format/size etc.
 - No info concerning label on the bill
 - Label on studded tyres
 - No info on rethreaded tyres, manufacturing date, etc. on the web







Verification of documentation

 876 requests for documentation contacting the following economic operator (details in the table)

Dealer	172
Importer	314
Manufacturer	278
Representative	112
	876

- For 10% of cases no documents received
- For more than 40% documents delivered after more than two weeks and after repeated requests







Verification of documentation

- For 334 documents received (38%) there were non compliances
- Main problems:

 Incomplete documents received 	164
 Delivery of documents too late 	57
 No documents received 	26
 Wrong documents received 	19
 Faulty documents received 	17







131 tyres tested

- 16 (12%) not compliant to Wet Grip
 - 3 from HR-LV, 2 BG-IE-RO, 1 DE, EE, LT, LU
- 20 (15%) not compliant to Rolling Resistance
 - 4 from SE, 3 from BG-IE, 2 DE, 1 BE, EE, ES, FI, HR, LU, LV, PL
- No tyres failing both WG and RR







Repetition tests

- Members have analysed the results and have decided which of non compliant tyres are not in line with the Regulation
- Tyres with declaration for RR or WG not in line with Regulation now being retested to verify if in compliance or not with declared values
- According to Annex VI three samples will be retested
- The average measurement value from the three tyres tested will be considered to assess conformity with the declared information







Results of repeated tests for WG

WG	1st test	repetition
BG-06	NOK	OK
DC 40	NOK	NOV
BG-10	NOK	NOK
DE-04	NOK	NOK
EE-08	NOK	Not required
HR-01	NOK	OK
HR-06	NOK	OK
HR-11	NOK	OK
IF 01	NOK	NOV
IE-01	NOK	NOK
IE-08	NOK	NOK
LT-03	NOK	OK
111.40	NOV	01/
LU-10	NOK	OK
LV-02	NOK	NOK
LV-06	NOK	OK
LV-08	NOK	OK
RO-01	NOK	Pending
RO-02	NOK	Pending







Results of repeated tests for RR

RR	1st test	repetition
BE-01	NOK	Not required
BG-04	NOK	NOK
BG-07	NOK	Not required
BG-09	NOK	OK
DE-08	NOK	Not required
DE-11	NOK	NOK
EE-01	NOK	Not required
ES-07	NOK	NOK
FI-04	NOK	NOK
HR-04	NOK	NOK
IE-03	NOK	OK
IE-04	NOK	OK
IE-06	NOK	OK
LU-08	NOK	NOK
LV-05	NOK	Not required
PL-03	NOK	Not required
SE-03	NOK	NOK
SE-07	NOK	NOK
SE-10	NOK	NOK
SE-11	NOK	Not required







Overall result of tests

- Out of 131 tyres tested:
 - from the 16 non compliant for WG, after repetition tests:
 - 5 were still NOK
 - 8 were OK
 - 8 were not tested after analysis of tolerances
 - 2 were not tested as samples were not made available in time







Overall result of tests

- Out of 131 tyres tested:
 - from the 20 non compliant for RR, after repetition tests:
 - 9 were still NOK
 - 4 were OK
 - 7 were not tested after analysis of tolerances







Enforcement activities

- Members discussed the results of previous activities and agreed on a common approach to enforcement actions
- Each participant undertook the agreed enforcement actions for those products that were found to be non-compliant for Labelling, Technical Documentation, Tests.
- Results of this action (products re-labelled, withdrawn, sanctions applied etc.) will be added to the database and sent to all EU MSAs and Turkey via the ADCO
- Involvement of WP6 for communication and dissemination
- For more than 1700 models letters were sent to Economic Operators for corrective actions, in nearly 30% of cases the Economic Operator took voluntary actions
- Most data are available even if enforcement is still running in some Countries







Enforcement Actions

	Letter to economic operator	Voluntary action to correct documentation or labelling
BG	131	4
EE	3	
ES	103	
FI	165	5
HR	19	5
IE	125	4
LU	51	11
LV	267	6
PL	24	16
RO	2	26
SE	14	10
TR	126	4
	TOTAL 1030	91







Monitor impact

Summary of impact for the following categories of information:

- Based on results of tests NO products were removed or withdrawn from the market, as consequence:
 - No specific evaluation of energy saving
 - No specific evaluation of consumer detriment the financial impact of the extra energy required by the noncompliant products is not relevant
 - No estimation of wider energy savings were possible

Following the dissemination of info from the Joint Action awareness of consumers will increase and choice of more efficient tyres will be stimulated.







Main problems faced

- Selection and testing of tyres considering availability/climatic conditions
- Interpretation of the Regulations and relevant tolerances for the evaluation of the compliance after tests
- Documentation does not refer to Regulation
- Long time needed to receive required documentation
- Costs for purchase-dispatching
- Cross-market inspections: e.g. sample selected in one Country but responsible Economic Operator in other Countries







The main results of the JA

- Evidence that there are problems on:
 - correct information on shops or on the web,
 - availability of the Technical documentation,
 - suitability and completeness of the technical documentation
- On the other hand the JA showed that models on the market are basically in line with the declared classes for both WG and RR







Overall positive results

- Increase of competence of the inspectors of all participating members, thanks also to the training developed by WP2 and WP3
- Evidence to the market that there were inspection action thus giving more recognition and acceptance of the requirements of the Regulation for the market operators (dealers, distributors, etc.)
- Increase of awareness of consumers thanks to documentation developed in the frame of the JA and specific events organized by memebrs of the JA
- Use of tablets and relevant software on web and app has been successfull, but improvements are needed to make it more «user-friendly» and flexible in use