

Retreaded Tyres – Tyre to road rolling sound emissions

Joint submission from BLIC and BIPAVER

In view of the decision of WP.29 to allow the Group of Experts on Noise (GRB) to consider the development of a Regulation concerning tyre to road rolling sound emissions from retreaded tyres and of the decision by GRB to discuss the subject at its forty-second session, the associations representing both the new tyre manufacturer's that are also involved in retreading (BLIC) and the independent tyre retreaders (BIPAVER) had hoped to be in a position to make a positive proposal for discussion at this session of GRB based on Regulation No. 117 for rolling sound emissions from new tyres.

The Associations confirm the desire to have an appropriate Regulation in order to have a route for approval of retreaded tyres with regard to tyre to road rolling sound emissions. Such a Regulation would allow the retreading industry to compete in the market place on an equal footing with new tyres and would help to maintain existing markets, both as original equipment and as in-service replacements.

The Associations have re-formed the original joint discussion group and are developing a proposal for an effective form of approval that is fair and equitable across the wide spectrum of retread tyre producers. Due to the different forms of retreading procedures, defined in Regulations Nos. 108 and 109*, and the disparity in the size of the companies involved in retreading, this is proving to be a complex issue and the group now feels that May 2006 is a practical target date for completion of a final draft. Initial indications are that there would not be any change from the test procedures and limit values given in Regulation No. 117 and that the draft would consider approval and conformity of production procedures that are appropriate to the retreading industry, as was the case with Regulations Nos. 108 and 109. The Associations would like to apologise to all delegates for this delay but believe that it is essential to investigate and have a thorough understanding of the effects on all segments of the industry before making any positive proposal. It is intended for a progress report to be presented for the forty-third session of GRB in February 2006.

* For an understanding of retreading procedures, the definitions given in Regulations Nos. 108 and 109 plus further explanations are:

- 2.37. **"Retreading"** - means the generic term for reconditioning a used tyre by replacing the worn tread with new material. It may also cover the renovation of the outermost sidewall surface. It covers the following process methods:
- 2.37.1. **"Top capping"** – replacement of the tread (only).
- 2.37.2. **"Re-capping"** – replacement of the tread and with new material extending over part of the sidewall.
- 2.37.3. **"Bead to bead"** – replacement of the tread and renovation of the sidewall including all or part of the lower area of the tyre.
- 2.41. **"Tread material"** - is material in a condition suitable for replacing the worn tread. It can be in several forms for example:

- 2.41.1. **"Camel-back"** – pre-cut lengths of (raw) material which have been extruded to give the required cross section profile and subsequently fitted cold to the prepared casing. The new material must be cured.
- 2.41.2. **"Strip-wound"** – a ribbon of tread material (raw) which is directly extruded and wound on to the prepared casing and built up to the required cross sectional contour. The new material must be cured.
- 2.41.3. **"Direct extrusion"** – tread material extruded to give the desired cross sectional profile and directly extruded on to the prepared casing. The new material must be cured.

Note that the methods given in paragraphs 2.41.1., 2.41.2. and 2.41.3. result in a tread pattern that is formed directly in the curing mould. The tread pattern may be the same as that used by a new tyre manufacturer, a modification of such a pattern, or may be developed entirely by an independent retread tyre manufacturer not having any association with, or affiliation to, a new tyre manufacturer.

- 2.41.4. **"Pre-cured"** – a previously formed and cured tread applied directly to the prepared casing. The new material must be bonded to the casing.

Note that in this case the tread pattern is normally developed by the manufacturer of the pre-cured tread material and will be supplied in bulk to a number of independent retread tyre manufacturers.

Once again, the Associations apologise for the delay and hope that delegates will agree that this should result in better use of the valuable time available for discussion during future sessions of GRB and will retain the item on the agenda.
