



GREENPAPER
CONTRADICTIONARY EU REGULATIONS
JEOPARDIZE CLIMATE
TARGETS AND RETREADING

CONTRADICTION BETWEEN EU TAXONOMY REGULATION AND EU CRITERIA FOR GREEN PUBLIC PROCUREMENT JEOPARDIZES CLIMATE TARGETS AND RETREADING

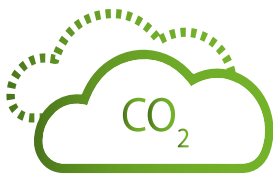
The European retreading industry is suffering from over-regulation, a shortage of skilled workers, high energy prices, a market glut due to cheap imported tires from the Far East and a lack of support from politicians. It has been possible to ensure that the current EU criteria for green public procurement in the road transport sector allow all public sector vehicles to be fitted with retreaded tires in a legally compliant manner. In practice, however, the EU Taxonomy Regulation on the road transport of goods and passengers prevents the use of retreaded tires, as retreaded tires are still not included in the scope of the tire labeling regulation.



The EU Commission's self-contradiction against its own recommendations and regulations has drastic consequences for retreading companies. Only recently, the purchase/use of retreaded tires was stopped at a major transport company due to the EU Taxonomy Regulation.

With the EU Taxonomy Regulation, the EU Commission is attempting to classify economic activities in terms of their sustainability. The sustainability of companies is to be assessed and promoted. According to the EU taxonomy, economic activities are considered environmentally sustainable (taxonomy-compliant) if they make a significant contribution to at least one of the six environmental objectives defined in the EU taxonomy:

Environmental targets according to the EU Taxonomy Regulation



Climate protection



Adapting to
climate change



Sustainable use and
protection of natural resources



Transition to a
circular economy



Prevention and reduction of
environmental pollution



Protection and restoration of
biodiversity and ecosystems

The EU regulation also affects the road transport of goods and passengers and also refers to the use of „suitable tires“, among other things. The measures to „prevent and reduce pollution“ include (new) tires that have the lowest rolling noise label classification available in the respective tire class and one of the two best rolling resistance classifications according to the current Tyre Labelling Regulation (EU) 2020/740. As retreaded tires are currently still not included in the scope of the tire labeling regulation, this means that retreaded tires are generally excluded or unsuitable. Here, the EU is contradicting its own regulations, to which the European retreading association BIPAVÉR and the Alliance Future Tires (AZuR) have raised massive objections.

BIPAVÉR has been trying for years, together with the new tire industry (ETRMA/ETRTO), to initiate the possibility of issuing/creating a tire label, at least for retreaded C3 tires (truck and bus tires). This tire label would make it possible to integrate retreaded truck and bus tires into the tire labeling regulation and thus also into the taxonomy regulation.

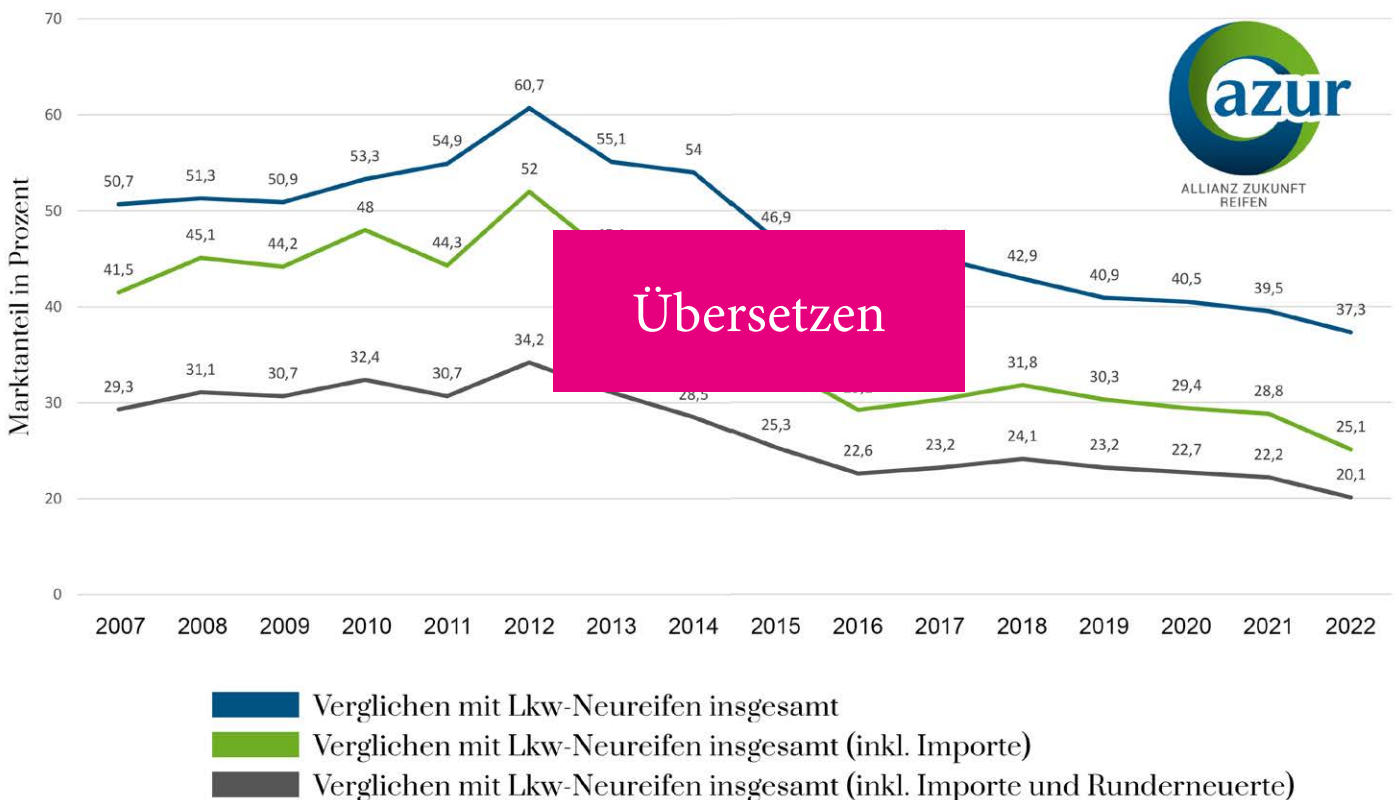
Nevertheless, it has been possible to ensure that the EU criteria for green public procurement in the road transport sector place retreaded tires on an equal footing with new tires in terms of environ-

mental and safety properties – provided that the retreaded tires are type-approved in accordance with ECE R 108/109.

This contradiction of the EU Commission against its own recommendations and regulations has drastic consequences for retreading companies. Only recently, the purchase/use of retreaded tires was stopped at a major transport company due to the EU Taxonomy Regulation.

Immediately after this case became known, the BRV once again explicitly pointed out this self-contradiction to the EU Commission and once again called for an adjustment to be made as quickly as possible in favor of the usability of retreaded tires. In this context, the EU Commission was once again reminded of the urgency of the long overdue integration of retreaded C3 tires into the tire labeling regulation. This is the only way to ensure that retreaded tires are finally given the position they have long deserved in the sustainable tire circular economy.

Marktanteile runderneuerter Lkw-Reifen in Europa



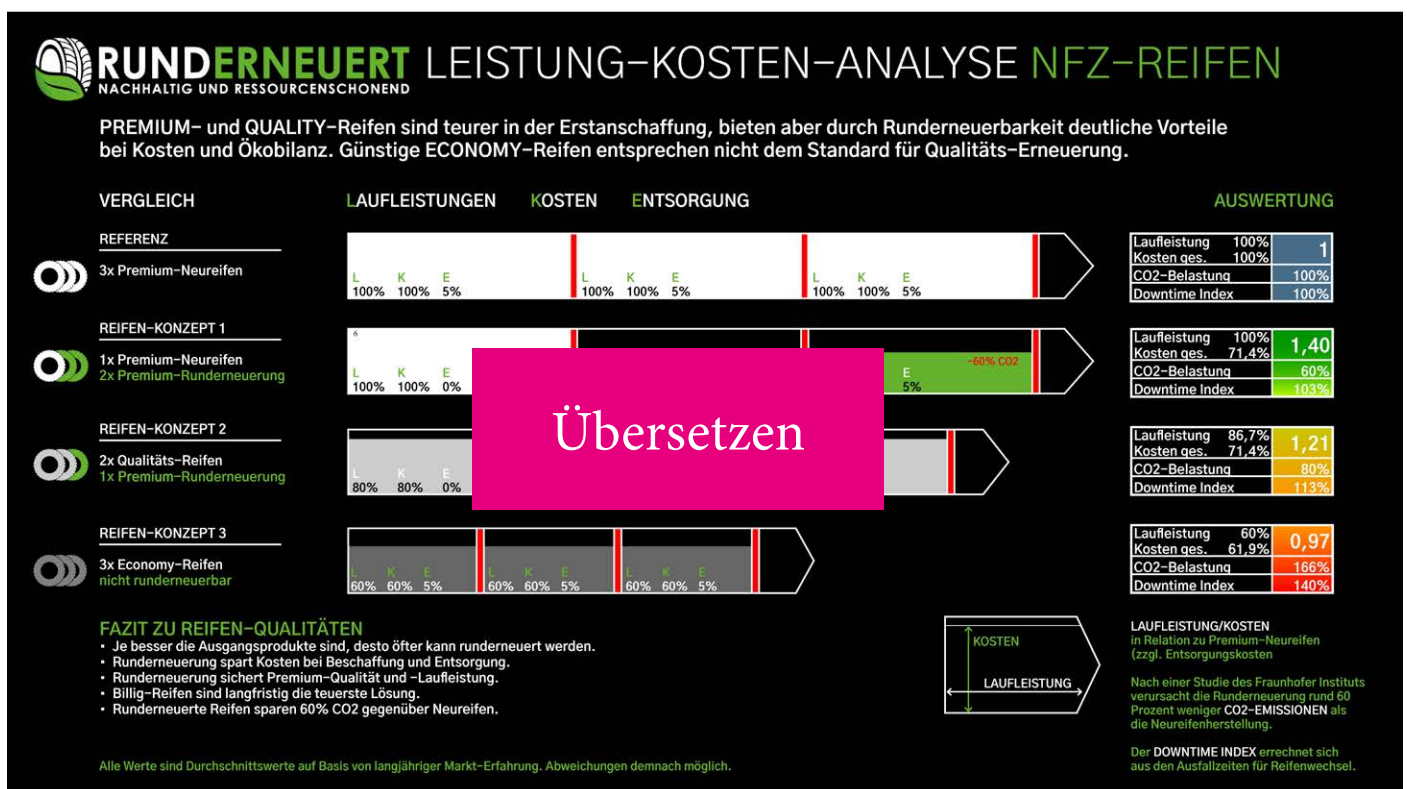
Retreaded tires are increasingly being displaced in Europe by imported tires from the Far East. According to ETRMA figures, the European market share of retreaded truck tires has plummeted from 34.2% (2012) to 20.1% (2022) within ten years.

Retreading tires is a proven process that was invented in Germany over 100 years ago and has been continuously optimized ever since. Retreaded tires have been proven to offer the same quality, safety, mileage and performance as comparable new tires.

According to a study by the Fraunhofer Institute UMSICHT, retreads also offer significant ecological advantages. Compared to new tire production, retreading saves over 60 percent of CO2 emissions and around two thirds of raw materials (primarily rubber). In addition, retreading requires around 50 percent less energy than new tire production.

Tires retreaded in Europe undergo numerous safety and quality checks and meet the high requirements of ECE R108/R109. The available tread variants cover all areas of use and axle positions. The tread profiles of retreaded tires correspond to those of new tires.

The use in terms of a circular economy is doubled with each tire retread. While car tires are retreaded once, the process can be repeated up to three times for branded commercial vehicle tires and even up



A performance-cost analysis has shown that premium retreading of premium tires for commercial vehicles pays off both ecologically and economically. With an index of 1.4, double retreading of a premium tire is almost 30 percent cheaper than triple retreading and reduces CO2 emissions by around 40 percent. The triple use of non-retreadable economy new tires is by far the worst in terms of performance/cost ratio and also ecologically.

to twelve times for aircraft tires. The multiple reuse of high-quality carcasses of commercial vehicle tires is entirely in line with a sustainable circular economy and multiplies the mileage of the tires. A recent performance-cost analysis has shown that premium retreading of commercial vehicle tires quickly pays off for companies and the environment. The triple use of premium new tires served as a reference scenario. The double retreading of a premium tire achieved a significantly better performance-cost ratio in comparison. With identical quality, safety and mileage, costs can be reduced by almost 30 percent in this scenario.

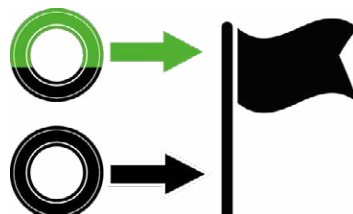
We are convinced that retreading can have a future in Europe if all market players pull together and the project finally receives consistent political support.

After all, tire retreading is a prime example of the successful implementation of a sustainable circular economy that helps to avoid waste, reduce CO2 emissions and conserve resources. If politicians do not act soon and resolve the conflicting objectives between the circular economy, the Taxonomy Regulation and chemicals legislation, retreading, the climate targets of the EU member states and the Green Deal will be at risk.

Ecological advantages of retreading at a glance



63% less CO2 emissions*



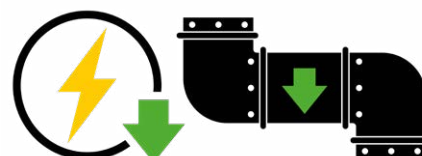
Mileage and rolling resistance like new tires



135 kg less CO2 emissions per truck tire*



Two thirds less raw materials and waste*



Around 50% less energy required (electricity and gas)*

* compared to the production of new tires

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AND RETREADING**



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