

Consultation Response Form

Consultation on European Commission Proposal for a Regulation Concerning Type-Approval Requirements For The General Safety Of Motor Vehicles

PART 1 - Information about you

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Company Name or Organisation (if applicable)	Environmental Protection UK
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input checked="" type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>Environmental Protection UK is the environmental protection charity supported by pollution control professionals. We have been working for a cleaner, quieter, healthier world since 1898.</p> <p>Our membership consists of 253 Local Authorities, 322 Individuals, 95 Businesses and 10 Academic Institutions.</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why:</p>	

Your comments are particularly invited on:

Do you think the assumptions and cost estimates in the Impact Assessment (IA) appear realistic?	Yes x	No <input type="checkbox"/>
<p>Please explain your reasons or add any additional comments you wish to make:</p> <p>Measures in the regulation do not appear to impose any undue burden on industry or the consumer and costs will be balanced by benefits (to date unquantifiable) from improved road safety, reduced noise and reduced fuel consumption, and the associated improvements in local and wider environmental quality. Further, source abatement measures to reduce noise are far more cost effective than any measures to mitigate the impacts of noise (eg barriers, quieter road surfaces). Furthermore, encouraging the widespread use of low noise tyres will enhance the noise benefit of existing low noise road surfaces and improve the cost-benefit ratio for their future application.</p>		

Do you think the benefit estimates in the Impact Assessment appear realistic?	Yes x	No <input type="checkbox"/>
<p>Please explain your reasons or add any additional comments you wish to make:</p> <p>See above.</p> <p>Reductions in CO₂ through lower rolling resistance tyres will make some contribution to reducing emissions from road transport – (currently estimated at 140 million tonnes by 2020), and therefore to meeting the ambitious CO₂ reduction targets set by the UK.</p> <p>On noise, the measures will help the UK government to meet the objectives of the Environmental Noise Directive. Although there is to date a lack of substantive research on health and economic impacts of road traffic noise, there are increasing indications that cannot be ignored linking traffic noise to health risk (for example, the GLA study published last year that found up to 500 cases of heart disease in the City could be caused by road transport noise¹). Also, there are indications of reduced property prices and issues of social equity. We believe health, social and economic benefits of reducing traffic noise will prove to considerably outweigh projected costs – both to business and society as a whole.</p> <p><i>1. The Effect of Noise on Physical Health Risk in London - Berry Environmental Ltd</i></p>		

Do you think the timescales for the introduction of the standards look reasonable?	Yes x	No <input type="checkbox"/>
<p>Please explain your reasons or add any additional comments you wish to make:</p> <p>We accept the timescales set – although we believe this could have been brought forward with an earlier impact on reducing CO₂ emissions from road transport, and benefit to communities affected by noise in support of the Environmental Noise Directive - without placing an unmanageable burden on industry.</p> <p>We believe it should not be beyond the ability of industry to manage tyre stocks to ensure a phase out of non compliant tyres within a year of implementation of the regulation.</p>		

Do you agree with the definitions of tyres given in the proposal?	Yes x	No <input type="checkbox"/>
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Please explain your reasons or add any additional comments you wish to make:

We agree with the definitions that are given in the proposal. However, we would like clarity in the definition of 'off road professional tyres' – as it is not currently apparent exactly what types of vehicle would be included in this category.

<p>Do you agree with the stringency of the proposed standards or whether you feel that tighter or laxer standards are appropriate and achievable?</p> <ul style="list-style-type: none"> • Noise • Rolling resistance Stage 1 • Rolling resistance Stage 2 • Wet grip 	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
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Please explain your reasons or add any additional comments you wish to make:

We would have liked to have seen stricter standards for noise and rolling resistance, in line with those proposed by the European Federation for Transport and the Environment¹, which were supported by research indicating that these are feasible with regard to both road safety and the economic health of the industry. However, at this stage in the process Environmental Protection UK are eager to see regulation without further delay and therefore accept the standards put forward. We believe that standards for noise should be revised in line with technological advance. We would therefore like to see a second stage for introducing more stringent noise measures, which research to date indicates will be achievable, or a periodic review, as appropriate, to ensure continued effective reduction of road transport noise.

1. T & E Background Briefing - EC proposal for Tyres in Type-approval Requirements for the General Safety of Motor Vehicles COD 2008/100 October 2008

<p>Where advanced safety features such as Lane Departure Warning Systems and Advanced Emergency Braking Systems are mandated, are there any vehicles you believe should be considered when evaluating whether exemptions should be applied?</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
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Please explain your reasons or add any additional comments you wish to make:

no comment

<p>Do you think the assessment of the effect of the regulations on competition and upon small businesses looks reasonable?</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
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Please explain your reasons or add any additional comments you wish to make:

As the regulation applies to all it should have no adverse effect.

Do you foresee any unintended consequences of adopting this Regulation?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Please explain your reasons or add any additional comments you wish to make:

We would hope the rolling resistance and noise measures contained in the regulation will serve to increase awareness in business and consumers of transport impacts, and demonstrate that these can be addressed

If you have any other general comment that you would like to make concerning this consultation, please give them here:

Environmental Protection UK are very encouraged to see the UK government supporting this regulation. We hope that future similar consultations are addressed directly to the noise as well as air quality specialists, enabling us to put together a considered response in the available consultation period.