



environmental  
protection uk

**Cc: Giles Chichester; Fiona Hall; Mary Honeyball; Eluned Morgan; Neena Gill; Malcolm Harbour; John Purvis; Peter Skinner; Alyn Smith**

**By email: 12 February 2009**

Dear Mr Dover

**Labelling tyres for quieter, as well as safer and more energy efficient transport.**

**Re: Commission proposal for energy labelling of tyres COM (2008) 0779 – COD 2008/0221**

I am writing to you as a member of the ITRE Committee, on behalf of organisations in the UK concerned with the increasing impact of transport noise on human health and quality of life in the UK, to present our views on the Commission proposal for energy labelling of tyres. We support an effective, informative and visible label, to include a noise rating alongside rolling resistance and safety. This would be a valuable tool, enabling purchasers to make a decision on the basis of fuel savings, reducing environmental impact and on safety. It would also support member states in working towards the objectives of the Environmental Noise Directive – 2002/49/EC (to avoid, prevent or reduce the harmful effects, including annoyance, of exposure to environmental noise), providing them a valuable tool to support noise action planning work, which is about to commence in the UK. It would also demonstrate that all who travel can contribute to reducing the impact of their journeys.

The precedent has been set for including these three parameters in a single regulation, following on as this does from the Tyres in Type Approval Requirements for the General Safety of Motor Vehicles COD 2008/100, which looks set to address tyre safety, noise and energy efficiency.

We believe noise must be included in the proposed labelling scheme for the following reasons<sup>1</sup>:

- To maintain consistency in regulation
- To support states in meeting the objectives of the Environmental Noise Directive in reducing the impact of transport noise on populations
- To raise awareness in purchasers of the impact their decision can make on the local and global environment
- To demonstrate to the public that all can contribute to reducing transport noise as well as emissions

In particular, in the UK, evidence is increasing on the health impacts of traffic noise – for example a recent assessment of the noise and health risk in the Greater London area<sup>2</sup> estimated that over 100 heart attacks, of which half could be fatal, could be attributed to exposure to transport noise. The noise maps published for England<sup>3</sup> show that, for example, in Manchester, over 17% of the population are exposed to road noise levels over 65dB(A); a level deemed by the World Health Organisation to

harm health. In the 2004 Merseyside study<sup>4</sup> road traffic noise was heard by 79%, bothered 44%, and caused sleep disturbance for at least 354,100 residents.

To start to address these impacts we want to see a labelling scheme that:

- Includes noise – presenting clear, comprehensible information – we support the T&E proposal for a colour coded traffic light label, alongside decibel rating, to clarify noise levels for consumers not familiar with the decibel scale
- Is consistently communicated in product information - promotional and technical
- Includes sidewall marking to enable spot enforcement checks
- Is subject to regular review, to improve procedures and include retread tyres. (The inclusion of retreads would have further environmental benefits as the reuse of tyres delays their entry into the waste stream and the need for manufacture of new tyres.)

This proposal offers a unique opportunity to engage consumers – both individual and fleet operators – in working towards a cleaner, quieter, healthier Europe. The urgency of tackling traffic noise and greenhouse gas emissions is clear. This proposal offers cost-effective means of achieving substantial reductions and raising awareness, and needs your support!

Meanwhile, you can view a demonstration of the impact of quieter tyres here: <http://nl.youtube.com/watch?v=u02SFvuDngE>. A full briefing is being prepared on this issue. If you would like a copy when it is finalized please get in touch.

Yours sincerely



Philip Mulligan  
Chief Executive, Environmental Protection UK



Andrew Davies  
Director, Environmental Transport Association

**John Stewart**  
John Stewart  
Director, UK Noise Association

**Gloria Elliot**  
Gloria Elliot  
Chief Executive, Noise Abatement Society

## Notes

1. Tyre labelling for safer, energy efficient and quieter road transport (if ready)
2. Effects of Noise on Physical Health Risks in London. 2008  
<http://www.london.gov.uk/mayor/strategies/noise/index.jsp>
3. Noise Mapping England <http://noisemapping.defra.gov.uk/cara/wps/portal/noise>
4. Merseyside noise study <http://www.merseysidenoisestudy.org.uk/>