



Good Practice Guidelines for Coordinated and Effective Market Surveillance of energy labelling of tyres

Module F - Guidance for the Conduct of Market Surveillance Tests

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When to commission testing of tyres?

Testing of tyres is very costly, expect to need a minimum budget of €5000 for each model to be tested. Consequently, testing should only take place after all other avenues to determine compliance, particularly checks on documentation, have been exhausted and strong suspicions remain that the model(s) will be found to be non-compliant through testing.

Testing cannot be undertaken in very hot or cold weather. The Regulations currently require conditions between 2 °C and 20 °C for snow tyres and between 5 °C and 35 °C for normal tyres.

What to test?

The testing procedures described in the Regulations (see Module B for details) is detailed and specific. It needs to be followed rigidly - there are no time or cost saving “short-cuts”. A single tyre is tested first. If the measured values meet the declared classes within the permitted tolerance, then the test is successfully passed. If it does not, then three more tyres or tyre sets are tested.

Where to commission testing of tyres?

Tests should be conducted by an independent i.e. not owned by a tyre manufacturer, laboratory that specialises in tyre testing. The Regulations identify two categories. One a “Reference laboratory” that is part of the network of laboratories the references of which have been published for the purpose of the alignment procedure in the *Official Journal of the European Union*, the other is a “Candidate laboratory” that participates in an official results alignment procedure.

There are only a few such laboratories established in the EU.

Interpreting the test results

The test report must confirm that tests have been conducted in accordance with the Regulation and not with UNECE Regulation No 117, which is similar. The report should provide the results of test only and not provide a verdict on whether the tyre is compliant. Compliance is determined by the commissioning authority considering the verification tolerances given in the Regulations. If the results of testing the first tyre suggest non-compliance, then three more tyres are tested. The average measurement value stemming from the three tyres or tyre sets tested is used to assess conformity.

As testing is so costly, some authorities may choose to begin discussions with a tyre supplier after the first sample has been tested and found to be possibly non-compliant. If the supplier accepts the validity of the result on one sample, then this could lead to avoiding the expense of undertaking tests on a further three samples.

NOTE: These are guidelines only. The Regulations should be used whenever specific guidance is required. Those governing market surveillance activities for tyres are listed in **Module B**. All these regulations can be downloaded from the internet at no cost.