



**EUROPEAN
TYRE & RUBBER
manufacturers'
association**

#TRACTION4CHANGE: A SHARED AGENDA FOR A COMPETITIVE, SECURE AND INCLUSIVE EUROPE

Europe leads the way in the transition to a net-zero economy, with safe, smart, and sustainable mobility at its heart. Today, Europe faces the challenge of establishing fairer global competition, addressing geopolitical uncertainty, and building a more inclusive society. To enable the European Union to continue its leadership in the transition, a renewed focus on industry and its competitiveness is required.

The tyre and rubber industry's products are developed and produced across Europe by thousands of skilled workers. They form an essential part of the value chains that underpin the twin transition, enabling sustainable and safe public and private mobility for all. The European Tyre and Rubber Manufacturers' Association (ETRMA) calls upon European policymakers to join us in setting an agenda for a competitive Europe that delivers on both the digital and green transition, especially regarding data and circular economy.



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#TRACTION4CHANGE:

-  Recognise the strategic role of the European tyre and rubber industry and enhance its competitiveness
-  Safeguard the Single Market by effectively implementing and enforcing legislation
-  Encourage investment in Europe through consistent and proportionate future regulation
-  Increase Europe's sustainability by designing and manufacturing circular and renewable products
-  Increase consumer choice, improve sustainable mobility and make roads safer by enabling digital mobility systems



RECOGNISE THE STRATEGIC ROLE OF THE EUROPEAN TYRE AND RUBBER INDUSTRY AND ENHANCE ITS COMPETITIVENESS

The European tyre and rubber industry provides the traction for Europe's economy and society. Without tyres and rubber goods, Europeans cannot move, our economy – from agriculture to communications – grinds to a halt, and our defence and healthcare systems are unable to function. Yet the sector faces significant barriers to maintaining a competitive manufacturing footprint in Europe. Energy and labour – which constitute a large proportion of our cost base - remain high.

We need to find workers who combine mechanical, chemical, electronic engineering and digital skills to support the transition to the continued digitalisation of the industry. Finally, this strategic industry remains dependent upon third countries for natural rubber, one of its most important raw materials.



THE TYRE AND RUBBER INDUSTRY COMMITS TO:

Playing our full part towards zero emission mobility through the continuous improvement of tyre performance, such as safer and lower emitting tyres, and the development of new services such as tyre-as-a-service

Building upon our industrial heritage through continued investment and innovation in Europe



ETRMA CALLS UPON POLICYMAKERS TO RECOGNISE THE STRATEGIC IMPORTANCE OF THE EUROPEAN TYRES AND RUBBER INDUSTRY BY:

Designing a Rubber Strategy for Europe that examines security of supply in a stable and sustainable rubber market

Addressing the high cost of energy as an input for production and recognising the industry needs competitive, sustainable, and reliable sources of energy

Promoting a fair global market for our products and applying trade defence measures where there is unfair competition

Carefully assessing the impact of the Carbon Border Adjustment Mechanism (CBAM) and of any future extension of its scope to raw materials for tyres and rubber goods. Providing EU funding for the digitalisation of our production and the upskilling of our workforce



SAFEGUARD THE SINGLE MARKET BY EFFECTIVELY IMPLEMENTING AND ENFORCING LEGISLATION

Over the last five years, much has been achieved in building the green pillar of the twin transition. This now needs to be consolidated through the implementation and enforcement of legislation across the European Union. Its scale and complexity impact the entire lifecycle of our products, from their raw materials, their in-use phase to their end of life.

Strengthening enforcement of Single Market rules, via more effective market surveillance, is crucial to achieving our shared objectives and to maintaining EU manufacturing capacity of strategic goods, like tyres.



THE TYRE AND RUBBER INDUSTRY COMMITS TO:

Contributing to a high-level dialogue across the automotive sector on the competitiveness of the entire industry



ETRMA CALLS UPON POLICYMAKERS TO JOIN US IN ENSURING FUTURE REGULATION IS FIT FOR THE FUTURE BY:

Opening existing platforms on enforcement and market surveillance to tyre and rubber industry participation

Undertaking market surveillance campaigns on key legislation, such as tyre performance requirements, labelling and deforestation regulation

Holding regular stakeholder discussions on the status of implementation of key legislation, where affected industries can contribute

Re-enforcing the effectiveness and increasing the use of existing platforms for the automotive sector related to market access



ENCOURAGE INVESTMENT IN EUROPE THROUGH CONSISTENT AND PROPORTIONATE FUTURE REGULATION

Any future policy or regulation should take a holistic view of the tyre and rubber industry and its products as an integral part of the global automotive industry. We are committed to working with other automotive stakeholders to this end.

Policy should balance the trade-offs between goals, such as environmental performance and road safety. It should acknowledge the numerous existing legislation regulating our products and the need for alignment with international rules and standards (e.g., United Nations Economic Commission for Europe – UNECE). Impact assessments, both ex-ante and ex-post, should examine the cumulative impact of regulation.



THE TYRE AND RUBBER INDUSTRY COMMITS TO:

Introducing products that continue to improve road safety and enhance environmental performance

Investing to enable the achievement of our shared ambition for a reduction in the environmental footprint of tyres and rubber goods



ETRMA CALLS UPON POLICYMAKERS TO JOIN US IN ENSURING REGULATION IS FIT FOR THE FUTURE BY:

Revising the tyre labelling regulation in a way that is both implementable and enforceable

Completing the single market for rubber products in contact with food and drinking water

Ensuring that existing legislation is considered when designing the delegated act on tyres under the Eco-Design for Sustainable Products Regulation (ESPR)

Committing to ex-ante and ex-post impact assessments on all proposals throughout the legislative process, considering both socio-economic impact and other policy goals



INCREASE EUROPE'S SUSTAINABILITY BY DESIGNING AND MANUFACTURING CIRCULAR AND RENEWABLE PRODUCTS

The tyre industry drives circularity ensuring that for every tyre sold, a tyre is collected and made available for recycling. We retread and regroove truck and bus tyres, saving raw materials and energy. More can be done to enhance tyre circularity by creating a single market for secondary raw materials. Policy needs to recognise the environmental benefits of renewable as well as recycled content in our products and provide financial incentives for innovative production and recycling processes. Rules on chemicals need to align with climate and circular economy goals.

Rubber is not plastic. Its physical and chemical properties make it fundamentally different from other polymers. As a result, these characteristics should be considered in chemical legislation.



THE TYRE AND RUBBER INDUSTRY COMMITS TO:

Working with the Commission to develop ESPR measures for tyres to further enhance tyre circularity and sustainability while preserving safe mobility, including increasing recycled and renewable content in tyres

Continuing to drive effective collection and treatment of end-of-life tyres (ELT), whilst working to achieve the goal of replacing fossil raw materials with recycled and renewable materials



ETRMA CALLS UPON POLICYMAKERS TO PROMOTE CIRCULARITY AND SUSTAINABILITY FOR OUR PRODUCTS BY:

Designing green public procurement schemes that encourage the retreading industry and increase market demand of end-of-life tyre derived materials

Establishing incentives that promote the demand for better environmentally performing tyres

Creating a harmonised approach across Europe to tyres at the end of life, starting with the adoption of EU wide end of waste criteria for end of life of tyres derived materials

Dedicating European funding to innovative industrial production processes, the development of new advanced materials and the deployment of renewable or recycled materials in our products



INCREASE CONSUMER CHOICE, IMPROVE SUSTAINABLE MOBILITY AND MAKE ROADS SAFER BY ENABLING DIGITAL MOBILITY SYSTEMS

Allowing real-time access to standardised in-vehicle data is vital as we look to deliver digital mobility solutions. Such solutions improve the performance of vehicles through better tyre care and maintenance, resulting in greater in-service life, reduced CO2 emissions and increased possibility for retreading. These solutions are central to increased road safety, enabling drivers to address issues before they escalate and supporting public authorities in maintaining road infrastructure. For the tyre industry to continue innovating in consumer-centric solutions within the digital transition, having a clear legislative framework is of the outmost importance.

Digitalisation has an increasing role in supporting the circular economy. The industry standards developed by the Global Data Service Organisation (GDSO) provide the basis for the development of future digital tools.



THE TYRE AND RUBBER INDUSTRY COMMITS TO:

Providing digital solutions to our customers to improve the safety, efficiency and environmental performance of vehicles

Contributing to the creation of the Common European Mobility Data Space

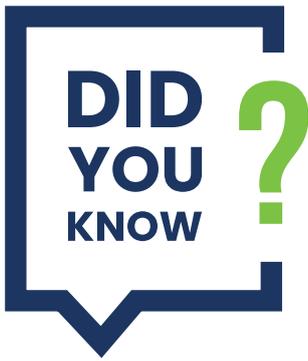
Developing industry standards to support the establishment of digital tools for circular economy



ETRMA CALLS UPON POLICYMAKERS TO SUPPORT THE DIGITAL TRANSITION BY:

Complementing the EU Data Act with sector specific legislation on access to in-vehicle data

Ensuring interoperability on digital passports between different legislation (ESPR, End-of-Life of Vehicle Regulation – ELVR), building upon the work of the GDSO



RUBBER IS EVERYWHERE, IT IS IN TYRES BUT ALSO IN SEVERAL OTHER APPLICATIONS IN THE FORM OF GENERAL RUBBER GOODS:

Major markets are:



TRANSPORT

(automotive, rail, ships, aviation, aerospace,...)



ENERGY / OFFSHORE



HOUSEHOLD APPLIANCES



INDUSTRIAL APPLICATIONS

(construction, mining, agriculture, machinery,...)

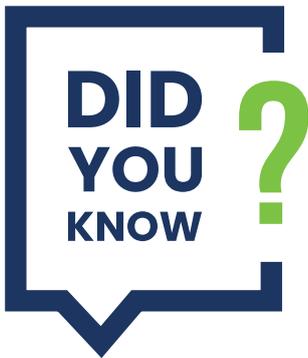


FOOD CONTACT

(drinking water, baby care, medical devices,...)



LEISURE & SPORTS EQUIPMENT



RUBBER IS A MATERIAL THAT IS UNIQUE AND STRATEGIC, WHICH CANNOT BE REPLACED. TYRES ARE A LOT MORE THAN RUBBER AND ARE MADE OF ABOUT 200 RAW MATERIALS AND THEY ARE USED IN SEVERAL APPLICATIONS:



PASSENGER CARS, LIGHT TRUCK



AGRI



HEAVY TRUCK, BUS



INDUSTRIAL



MOTO



OFF THE ROAD (E.G., MINING)



BIKE



AEROSPACE

About ETRMA

ETRMA represents the European tyre and rubber manufacturers at both the European and international level. We are involved in continuous dialogue with EU and international institutions, national agencies and other industry sectors.

As the voice of tyre and rubber goods producers, our activities focus on representing, communicating and promoting the industry to policymakers, providing regulatory support as well as providing technical advice for its members.

The European Tyre & Rubber Manufacturers' Association (ETRMA) and its members account for around 4,400 companies in the EU, directly employing 370,000 people. ETRMA tyre company members represent 70% of global tyre sales. We have a strong presence in EU and candidate Member States, with 93 tyre-producing plants and 17 R&D centres.



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CONTACT INFORMATION

ADAM MCCARTHY

SECRETARY GENERAL

a.mccarthy@etrma.org

MARTA CONTI

SUSTAINABLE SUPPLY CHAIN & TRADE

m.conti@etrma.org

CAMILLE BARRÉ

TRANSPORT & DIGITAL MOBILITY

c.barre@etrma.org

ALEX VAN GELDEREN

ENVIRONMENT & CIRCULAR ECONOMY

a.vangelderens@etrma.org

STELLA MATHIOUDAKI

CHEMICALS AND HEALTH & SAFETY

s.mathioudaki@etrma.org



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