Response ID ANON-51JF-SHP1-J

Submitted to Consultation on the Ban of Tyres Aged 10 Years or Older on Heavy Goods Vehicles, Buses, Coaches and Minibuses
Submitted on 2022-10-25 11:23:56

FOREWORD

BACKGROUND AND CONTEXT

HOW TO RESPOND

CONFIDENTIALITY & DATA PROTECTION

THE PROPOSAL

RATIONALE

IMPLEMENTATION

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ENVIRONMENTAL IMPACT

Questionnaire - Banning Tyres Aged 10 Years and Older on heavy goods vehicles, buses, coaches and minibuses.

1 What is your name?

Name (Optional):
Seamus Leheny

2 What is your email address?

Email:
sleheny@logistics.org.uk

3 Please specify which of the following you are.

Other (i.e. tyre supplier/fitter)

If you selected other, please specify:
Logistics UK

4 Do you agree that we should ban the use of first life tyres aged 10 years and older on the front axles of HGV's, buses and coaches, and all axles on minibuses when fitted in single configuration?

Yes

If you selected no, please provide your reason.:

5 Do you agree with our approach for re-treaded tyres (that their age should be defined from the date of the re-treading and those that were re-treaded 10 or more years ago should be subject to the same restrictions as first life tyres that are 10 years and older)?

No

If no, please provide details of any proposed alternative treatment for re-treaded tyres in any legislation.:

Research evidence – Logistics UK has several concerns regarding the validity of DfT's research document (produced by TRL) as a basis for this ban. There were only 31 commercial tyres tested, all were 295/80 R22.5 tyres from one manufacturer, of first life (not re-treaded) and their age ranged between 3 and 19 years.
In TRL's own conclusion, it states "Given the limited number of tyres involved in this research compared to the number in use in the UK, statistically valid conclusions may not be made without an increased sample size; the in-service conditions such as under-inflation (to any degree), overloading and the heat history of each tyre during its
lifetime were unknown, thus it was not possible to conclude whether the observed changes were a result of only service use, age alone, or a combination of both".
The research by TRL represents insufficient evidence upon which to propose a ban on re-tread tyres and we would recommend that further research be

undertaken. However, DfT could consider the “Bridgestone Tyre Debris Study Report 2015-17”, which was done in conjunction with Highways England (https://edp-e-ne-p□bridgestone.azureedge.net/off-the-road/-/media/Files/Bridgestone/Downloads/2018/bridgestone_tyre_debris_study_report.ashx?la=en□gb&vs=1&d=20180424T085039Z).
This study looked at 1,035 tyres, 472 of which were commercial truck or bus tyres, and of those 165 were re-tread tyres – a size more quantifiable than that in the TFL report.
The Bridgestone Tyre Debris Study Report 2015-17 concludes that “retreaded tyres show no greater likelihood of failure in service than a first life tyre when considering these results against the market usage of new tyres vs retreaded tyres”. Indeed, the summary goes on to say: “that that with proper vehicle inspection and maintenance programs, many of the failures recorded in these results can be detected and prevented”.
Implementing policy decisions on the basis of such narrow research does not support the principle of evidence-based policy making. Logistics UK is concerned that this should set an unwelcomed precedent for policy making in the future.

6 Are you clear on how these proposals may affect you or your business?

No

If no, what other information would you find useful? :

These proposals need to be more prescriptive in regard to the words “steered axle”. The ban should only apply to front (1st) steered axles on motor vehicles; it should not apply to any steered tag axles on vehicles, or to steered axles on trailers

7 Do you agree with the proposed exemptions for tyre roadworthiness?

Yes

If no, please explain your response.:

8 Do you agree with the proposed exemptions for vehicles of historical interest?

Yes

If no, please explain your response.:

9 If the proposed implementation period of 3 months proceeds, do you envisage this timeframe will cause you/your business any operational issues?

No

If yes, please explain what operational issues you anticipate. :

The proposed 3-month implementation of this ban, following legislative approval, is insufficient for the commercial sector to make the necessary changes to ensure full compliance. Undertaking the logistics necessary to both assess, and where required, change tyres within a timescale of 3 months, is unreasonable and would place an unacceptable regulatory burden on the commercial sector. The extra costs associated with the early replacement of steered tyres, due to this ban, could be mitigated somewhat if this period was extended.
Any ban should include a 24-month implementation period which would be more manageable, less burdensome and would minimize the financial impact on the commercial sector.

10 Do you agree with our proposed approach to enforcement?

No

If no, do you have any suggestions on how we could improve our approach to enforcement? :

Scope of the ban – whilst the application of the ban on the first steered axle on motor vehicles was recognised, Logistics UK members felt that its application to all steered axles, including second steered axles on motor vehicles and steering on trailers was disproportionate.
Notwithstanding comments regarding the true impact of re-treaded tyres on tyre failure, any re-tread ban should be applied to front steering axles of motor vehicles only.
Logistics UK would like DFI to set out how it will apply this ban to non-UK hauliers. To ensure the intended outcome of this ban is effective, it needs to apply to all commercial vehicles used on our roads. Failure to do so would not only fail to bring about the desired roads safety improvements, but would also put UK hauliers at a competitive disadvantage to non-UK operators.
An effective enforcement regime must be established to ensure that UK operators are not at a disadvantage to non-UK operators.
Additionally, Logistics UK is concerned as to the practicality of some items.
UNCECE marking does not mandate all of the proposed marking in the areas specified. To impose an offence on someone / an entity where the tyres were sold, bought, and used legally, is both unfair and unjust. There needs to be a period of latitude applied to these proposals, to allow those tyres, which would become non-compliant, to make their way out of use.

11 What are your views on the potential of any negative environmental impact of our proposals?

Please advise of any negative environmental impact of our proposals.:

Logistics UK believes that this change will have a negative impact on the environment, leading to future tyres purchasing patterns moving more towards single use tyres. Should this be the case, then the environmental improvements which re-treaded tyres offer, will be lost.
As per our comments above, we believe that the research undertaken, upon which this proposal is being made, is not significant in supporting this policy decision. The Bridgestone / Highways England Study conclusion would suggest that there is no evidence to support the proposal regarding re-treaded tyres since carcasses of failed tyres recovered from the Strategic Road network were found in proportions matching
the proportions of re-tread vs single-use tyres in the UK market.