14th November 2025

European Commission DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)
Brussels, Belgium

Dear Director-General Jorna, Deputy Director-General Moutarlier, Director Nunes De Almeida, and Head of Unit Nicklas:

On behalf of The Pew Charitable Trusts, the Environmental Coalition on Standards, the European Environmental Bureau and the European Federation for Transport and Environment, I am writing to express our concerns regarding the implementation of the microplastic provisions under the Euro 7 Regulation and the parallel ongoing negotiations under the United Nations Economic Commission for Europe (UNECE).

The EU Zero Pollution Action Plan aims to reduce microplastic releases by 30% by 2030. Microplastics from tyres are the second largest source of microplastic pollution within Europe, with 360,000-540,000 tonnes entering the environment each year. By establishing an EU legal framework to control tyre-wear emission, Euro 7 plays a critical role advancing the EU Commission objective to address microplastic pollution in the EU.

Under the Euro 7 Regulation, UNECE was designated as the body responsible for the development of the test procedure for tyre abrasion and adoption of particle emission limits. This work is conducted by the UNECE Working Party on Pollution and Energy (WP - GRBP) and its subsidiary body - the Task Force on Tyre Abrasion (TF TA). This work should ultimately result in the adoption of a new UN Regulation to measure and limit tyre abrasion.

We are writing to express our concern regarding timing, the level of ambition, and the lack of transparency in the ongoing discussions taking place within the Task Force on Tyre Abrasion.

Timing

The introduction of a "two-staged approach", which was not foreseen under the Euro 7 Regulation, has already contributed to delays in agreeing the abrasion index limits. Stage 1, as currently discussed, remains aligned with the Euro 7 application dates for C1 tyres, yet its level of ambition is insufficient to deliver substantial environmental benefits. Stage 2, while more stringent, is scheduled for implementation several years later and therefore falls outside the Euro 7 timeframe, postponing meaningful reductions in microplastic emissions.

Furthermore, in September this year, the UNECE Working Party was not in a position to successfully conclude its work. As a result, the next meeting of the Working Party taking place in February 2026 now provides the last opportunity to maintain full alignment with Euro 7 application dates for C1 tyres and to ensure that the ambition currently foreseen for Stage 2 is incorporated into Stage 1, where it can deliver timely and effective impact.

Transparency

Since September, a number of key deliberations have moved outside the formal UNECE framework. Most importantly an informal group comprised of two industry associations, the European Tyre and Rim Technical Organisation (ETRTO) and the Japanese Automobile welding manufacturer (JASIC), has initiated a correlation exercise to reconcile the two proposed tyre abrasion testing methods (vehicle convoy and drum).

While these associations were invited to report progress on informal correlation work at the most recent meeting of the Task Force on Tyre Abrasion, the decision to advance this work outside of the UNECE process raises concern. There is no openness to broader participation in the work, and no commitment to share raw datasets/analyses with the government or stakeholder representatives of Working Group ahead of the Task Force December meeting. This raises governance and credibility risks at the very moment the EU must secure a defensible, enforceable standard.

Ambition and Integrity

In order to successfully achieve the Commission's objective to reduce microplastic pollution in the EU by 2030, it is critically important that the tyre abrasion index limits established by UNECE are sufficiently ambitious and consistent with the EU's stated objective to reduce emission levels. It is important to avoid a situation whereby the adopted methodologies or limits fail to effectively reduce emission levels or are ultimately unsuccessful in ensuring that tyres not meeting minimum environmental standards are taken off the market.

To avoid this situation, the adopted test method must meet a series of essential criteria that ensure both environmental integrity and fair market implementation:

- **Be scientifically coherent and mutually compatible.** If different testing methods (vehicle and drum) are not demonstrably correlated, the same tyre could pass one and fail the other, undermining legal certainty and environmental outcomes.
- **Be repeatable/reproducible and comparable across labs and countries.** This is essential for type approval, market surveillance, and Conformity of Production.
- **Be transparent and accessible.** Publicly available procedures and data allow independent scrutiny, continuous improvement, and trust.
- **Ensure a fair single market.** Consistent testing protects a level playing field, rewards genuine innovation, and avoids distortions of competition, while also contributing to environmental protection.

The Euro-7 regulation mandates the Commission to ensure that the EU applies robust, state-of-the-art procedures for abrasion within the established timeline. To uphold the integrity of the Euro 7 implementation process and safeguard both scientific credibility and market fairness, the European Commission's proactive leadership is now essential.

The Pew Charitable Trusts, the Environmental Coalition on Standards, the European Environmental Bureau and the European Federation for Transport and Environment respectfully urge the Commission to take the following actions:

1) Ensure data is made publicly available in a timely manner

Formally request that **ETRTO and JASIC** provide to **all Working Group members** (and upload to the shared workspace) **full spreadsheets, raw datasets, code/analyses, and versioned metadata** (tyre descriptors, test conditions, uncertainty treatment) by the end of 2025. Decisions based on non-transparent or

un-validated correlation risk legal and political challenge, and could delay environmental benefits. Public disclosure enables informed scrutiny of correlation strength, parameter choices, and uncertainty budgets.

2) Mandate an independent technical review by the Joint Research Centre (JRC)
Task **JRC** to publish, in preparation of the next meeting of the working group, an analysis that assesses:

- correlation strength and parameter sensitivity between the two methods;
- the uncertainty budget and its implications for any abrasion margins/tolerances;
- policy equivalence (i.e., that a given Abrasion Index (AI) limit yields comparable stringency under both methods).

3) Re-establish good governance under the Task Force
Request the co-chairs to ensure that the correlation work is conducted under the auspices of UNECE, governed by established Rules of Procedure, with participation open to all members (including JRC) and with all working data/outputs accessible on the platform. This aligns with existing Terms of Reference and strengthens legitimacy.

4) Preserve ambition and predictability
Tyres are among the largest quantified sources of microplastic releases in Europe. Weak methods or generous tolerances will blunt the real-world reduction, making the **2030 target** harder to meet.

At a minimum, ensure the outcome document is sufficiently objective to contribute to the objectives outlined under the EU Zero Polluting Action Plan, through a package that:

- **Sets or reconfirms AI ≈ 1.0 for Stage 1**, consistent with Commission/JRC evidence;
- **Tightens abrasion tolerances** in line with quantified repeatability/reproducibility (avoiding margins that outstrip demonstrated test precision);
- **Defines ambitious target values and timeline of Stage 2 now,** in order to maintain Euro 7 alignment and give industry clear, multi-year predictability. Setting Stage 2 this year provides 7–9 years of lead time, which should enable innovation while ensuring that microplastic reductions are achieved within this decade. Deciding now on limits to be applied in 2033 (for new tyres) and 2035 (for all tyres) ensures regulatory certainty and allows sufficient time for innovation.

5) Reaffirm the EU legal fallback

The Commission should notify the Working Group that should UNECE not adopt the package by the Euro 7 back-stop dates, it will proceed under Article 11(6) with delegated acts based on state-of-the-art methods— in order to ensure that C1 application dates (from 1 July 2028) are respected. Given the tight regulatory timelines and the pivotal role of the upcoming meetings, immediate action is essential to safeguard both the EU's environmental objectives and the credibility of the Euro 7 implementation process.

Pew, ECOS, EEB and T&E stand ready to support a solution that is scientifically credible, politically defensible, and environmentally effective. Bringing the correlation work under formal UNECE governance, making data publicly available, mandating an independent JRC analysis and defining a clear Stage 2 now will help the EU meet both its Euro 7 deadlines and the 30% reduction target in microplastics released into the environment by 2030 set in the Zero Pollution Action Plan.

Thank you for your attention to this file. We would welcome a short meeting with your services to discuss these recommendations before the December UNECE exchange.

Yours sincerely,

Paulus Tak, Director, Government Relations, The Pew Charitable Trusts

Valeria Botta, Programme Director, ECOS, Environmental Coalition on Standards

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Eva Bille, Head of Circular Economy, European Environmental Bureau