

**Banning Tyres
Aged 10 Years and Older
Communication Workers Union
Response to
the Department for Transport's
Consultation
September 2019**

Tyre Ageing



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Introduction:

This is the response of the Communication Workers Union which represents 200,000 Workers in the UK Communications Industry and whose members operate two of the largest Fleets of Commercial Vehicles in the UK and Europe.

Question 1.

Do you agree that we should ban the use of first life tyres aged 10 years and older on all axles of HGVs, heavy trailers, buses, coaches and minibuses? If not, please provide your reasoning.

CWU Answer:

CWU agree that it should be an offence to use or operate a vehicle on a road in the UK with tyres older than 10 years of age. Even if a tyre has never been used and appears to be in perfect condition, it is still unsafe to use if it is old. Many experts from around the world argue that the age limit should be no more than six or seven years old.

The life span is shorter still for tyres that have been in use or are part-used and then stored for re-use. Wear and Tear factors will effect tyre longevity.

The concerning thing is that many drivers don't know this fact and the number of accidents attributed to aged tyres is on the increase.

An aged tyre straight off the shelf looks brand new but the internal structure is significantly degraded. Like other rubber products tyres have a limited life span. Essentially, over time this degrading leads to reduced adhesion which creates tread separation. No matter whether the tyre is used or not, this degradation will occur.

These internal structure changes are impossible to identify without extensive testing so even an expert might not be able to tell the difference between a new and aged tyre other than the side-wall markings which are essential.

Old tyres can cause problems including:

- Blow-Outs
- Loss of control of the vehicle
- Reduced grip on the road
- Reduced ability to grip, particularly in wet conditions
- Loss of control..

These problems can have fatal consequences for the driver, passengers and other motorists. In recent years manufacturers have become more aware of the increase in accidents related to aged tyres and have begun to issue warnings on their tyres. Still, many motorists are largely unaware of this as these warnings are not widely publicised.

Question 2

Do you agree with our proposal, subject to the outcome of the consultation, to prohibit the use of retreaded tyres, of any age on the steered axles of HGVs, buses, coaches and minibuses? Please include any evidence you have relating to the safety of re-treaded tyres on the steered axles. If you do not agree, please provide your reasoning.

CWU Answer:

The CWU agrees that it should be an offence to fit re-treaded tyres of any age to steered axles of HGVs, buses, coaches and minibuses because a tyre failure on a steered axle has the potential for the vehicle to lose steering control.

Question 3

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)? If not, please provide details of any proposed alternative treatment for re-treaded tyres in any legislation.

CWU Answer:

CWU agree that it should be an offence for re-treaded tyres to be fitted to a non-steered axle if it exceeds 10 years from its date of re-treading. However we would refer the Dft to the points made above and we would prefer the limit to be 6 or 7 years. We also believe that the re-tread tyres must also be tested according to the same load and speed criteria as those used for new tyres.

Question 4

Do you think we have explained our proposals clearly, including how they might affect you? If not, what other information would you find useful?

CWU Answer:

Firstly, Yes the proposals are clear.

Secondly, the proposal to amend the Regulations (Construction and Maintenance of Tyres Regulation/ Construction and Use Regulations) should include requirements to ensure the clear visibility of markings on tyres, in any configuration, single or twin-wheel axles whereby the tyre markings of the date must be displayed on the outer tyre sidewalls and it should be an offence to drive or operate a vehicles when the date markings are not present or visible.

Question 5

Do you agree with the proposed exemptions for: a) Tyre roadworthiness? b) Vehicles of historical interest? Please explain your response.

CWU Answer:

CWU would agree with the proposed exemptions for agricultural motor vehicles driven at low speeds and Historic Vehicles provided that they are not used for commercial purposes.

Question 6

Do you anticipate any operational issues for you to be able to comply with the proposed implementation period of 3 months? If yes, please explain what operational issues you anticipate.

CWU Answer:

No.

Question 7

Do you agree with our proposed approach to enforcement? If not, do you have any suggestions for how we could improve our approach to enforcement?

CWU Answer:

CWU agrees with the proposed approach for enforcement. The Dft need to ensure that the Regulations are subject to a national public awareness campaign and clear communications to the commercial vehicle and bus and coach fleet operators and organisations as well as the Tyre manufacturers, commercial and retail suppliers and vehicle and tyre maintenance and repair industry.

CWU agrees that the Tyre law changes should be enforced via the Operator Licensing regime, roadside checks and roadworthiness checks etc. We believe that the duty of care and duty to comply should in the main be the responsibility of operator in most cases. The government must ensure that Police Services and the DfT are adequately resourced with sufficient Officers to enforce the Law.

Question 8

What views do you have on the analysis of the costs and benefits outlined in the consultation stage impact assessment?

CWU Answer:

The CWU strongly believes that the case is made out and Road Safety must come way before costs which in any case we don't believe will impact on many fleet operators who change tyres on their vehicles long before the 10 years maximum proposed due to the annual mileage covered, through normal wear and tear.

Question 9

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

CWU Answer

None.

Question 10

Do you think this ban on the use of tyres 10 years or older should be extended to taxis and Private Hire Vehicles?

CWU Answer

CWU would agree that any vehicle that is used to transport passengers for a fee should be governed by legislation on tyre age.

Question 11

Do you consider that tyre age should be part of the licensing test requirement for taxis and PHVs? If not, please suggest alternative methods for implementing any ban.

CWU Answer:

CWU Would agree that tyre age should be part of the licensing test requirement for taxis and PHVs.

Question 12

What else do you think we should be aware of in relation to an age-related ban for tyres for taxis and PHVs?

CWU Answer:

None.

Question 13

Do you have any other observations or comments about aged tyres?

CWU Answer:

None.

CWU welcomes the Department for Transport's positive proposals and CWU has no objection to our response being reproduced or attributed.

End.

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