

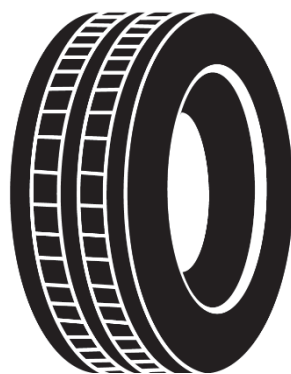
QUESTIONS & ANSWERS

April
2021
v.2

Accompanying

**Regulation (EU) 2020/740 on the labelling of
tyres with respect to fuel efficiency and other
parameters**

amending **Regulation (EU) 2017/1369** and,
repealing **Regulation (EC) No 1222/2009**



Questions and Answers

Last Update: May 2021

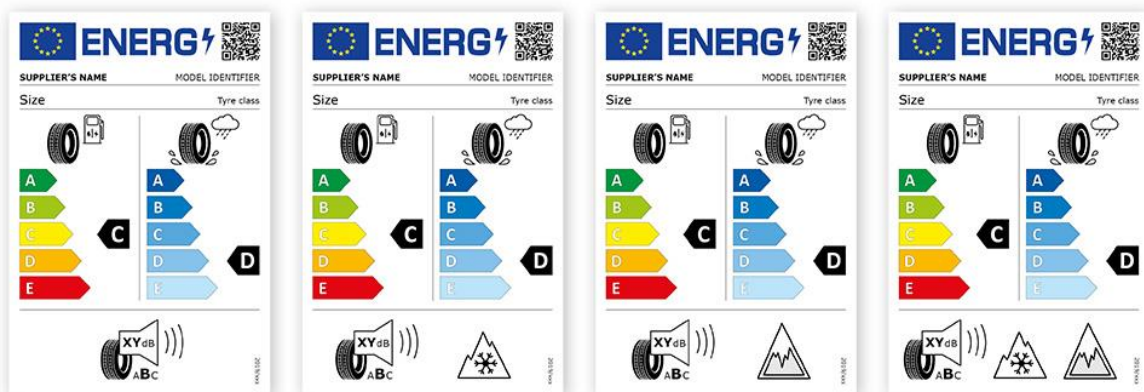
Introduction

Regulation (EU) 2020/740 entered into force on 25 June 2020. It repeals and replaces Regulation (EC) No 1222/2009, with start of application on 1 May 2021. It establishes a framework for the provision of harmonised information on tyre parameters through labelling to allow end-users to make an informed choice when purchasing tyres, for the purpose of increasing economic and environmental efficiency of road transport by promoting fuel-efficient, safe tyres with low noise levels.

While the content and format of the tyre label are laid down in Annex II, Annex I provides for the testing, grading and measurement of the following parameters:

- (A) Fuel efficiency classes and rolling resistance coefficient,
- (B) Wet grip classes,
- (C) External rolling noise classes and measured value,
- (D) Snow grip,
- (E) Ice grip.

The suppliers and distributors of vehicles and tyres are to provide end-users, before the sale, with the label for the tyres offered or fitted and any technical promotional material, and ensure the product information sheet, as set out in Annex IV, is available.



This document aims to help relevant stakeholders, including industry and public authorities, implement the Regulation. It responds to the most frequent questions from industry stakeholders. This document may be updated would additional clarifications be deemed necessary.

DISCLAIMER

This document is intended to be used only for facilitating the implementation of the Regulation. It is not intended to replace the Regulation or to provide "interpretation" beyond its intent. This document and the answers provided are not legally binding.

A finally binding legal interpretation of EU legislation may only be provided by the European Court of Justice. The guidelines are without prejudice to the position the Commission might take should an issue arise in a procedure before the European Court of Justice.

#	Article(s)	Question	Answer
1a	multiple	What does “placing on the market” of a tyre mean?	<p>Article 3(18) refers to the definition of the term in Article 3(2) of the Regulation (EU) 2019/1020 on market surveillance and compliance of products: ‘placing on the market’ means the first making available of a product on the Union market.’</p> <p>The operation is reserved either for a manufacturer, an authorized representative or an importer established in the Union, i.e. they are the only economic operators who place tyres on the Union market. When supplier provides a tyre to a distributor or an end-user for the first time, the operation is always considered in legal terms as ‘placing on the market’. Any subsequent operation, for instance, from a distributor to another distributor or from a distributor to an end-user is defined as ‘making available’ (see next question).</p> <p>It is important to underline that first making available is related to individual units of a specific tyre type¹ and is associated to registration in EPREL (i.e. from the start of application of a Regulation, the registration has to precede the “placing on the market” and the date indicated in the registrations for this has to be equal or later).</p>
1b	multiple	What does “making available on the market” of a tyre mean?	<p>According to Article 3(17) of the tyre labelling Regulation in conjunction with Article 3(1) of the Market Surveillance Regulation, ‘making available on the market’ means any supply of a product for distribution, consumption or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge’.</p> <p>A tyre type is "first placed on the market" only once by each supplier, but units or batches of tyres may be "made available" several times throughout the supply chain (first wholesaler, second wholesaler, etc., retailer) before it reaches the end- user (consumer or professional user) or is further mounted into another product.</p>

¹ Regulation 2017/1369 (setting a framework for energy labelling) refers to product model/model identifier whilst Regulation (EU) 2020/740 refers to tyre types/tyre types identifier. According to Regulation (EU) 2020/740:

- ‘tyre type’ means a version of a tyre for which the technical characteristics on the tyre label, the product information sheet and the tyre type identifier are the same for all units of that version;
- ‘tyre type identifier’ means a code, usually alphanumeric, which distinguishes a specific tyre type from other tyre types that have the same trade name or the same trademark as that of the supplier;

1c	multiple	<p>Should all suppliers register the product in EPREL if the same specific product (brand + tyre type) is imported in the EU by many economic operators,?</p> <p>Is the obligation the same if there is an EU authorised representative?</p>	<p>Each supplier is responsible for registering tyre types, units of which it places on the market.</p> <p>Each importer placing on the market tyres of a manufacturer located outside the EU/EEA, is considered as a supplier, independently of the fact that an authorised representative has been designated.</p> <p>The product registration works as follows:</p> <ul style="list-style-type: none"> (a) the first time a supplier makes available a unit of a tyre type on the Union market, it must have already registered all required information in EPREL, as stated in the applicable rules. This is the case even if units of the same tyre type have already been placed on the Union market by another economic operator. (b) If two separate suppliers place on the market units of the same tyre type, there should be two separate registrations in EPREL. The QR code on the label of each tyre unit unequivocally points to the registration and, thus, to the specific supplier. <p>In summary: a tyre can be placed on the EU market by any of the following categories of economic operators: EU/EEA manufacturers, authorized representatives and importers in the case of manufacturers not established in the EU/EEA. In case more than one economic actor acts as an importer, each of them is to fulfil the supplier's obligations in relation to those units of the tyre type they first place on the EU market.</p>
2	<p>4</p> <p>5</p>	<p>For tyres produced in the period between 25 June 2020 and 30 April 2021:</p> <ul style="list-style-type: none"> (a) Can tyres placed on the market within 30 April 2021 carry only the label as from Regulation (EC) No 1222/2009? and what from 1 December 2021? (b) Shall all tyres produced during that period and placed on the market after 1 May 2021 bear the new label from this date? 	<p>Article 4 establishes the obligation to accompany individual tyres (or batches) with a printed label, as from 1 May 2021. Article 5 provides for different registration provisions depending on the date of production/placing on the market.</p> <ul style="list-style-type: none"> (a) Yes, it is correct. C1 and C2 tyres produced in the period between 25 June 2020 and 30 April 2021 and placed on the market before 1 May 2021 will be bearing the old label as from Regulation (EC) 1222/2009. No label was required under Regulation (EC) 1222/2009 for C3 tyres. At the latest by 30 November 2021, units of C1 and C2 tyres produced within the mentioned period shall be registered in EPREL. (b) Units of C1 and C2 tyres produced in the period between 25 June 2020 and 30 April 2021 but placed on the EU market as from 1 December 2021 must be registered before placing them on the market. EPREL registration involves

			generation of an associated QR code pointing to it on the new label, at the latest by 30 November 2021.
3	5	Tyres are usually labelled at the moment of their production. Should suppliers (retrospectively) register in EPREL tyres produced in the period between 25 June 2020 and 30 April 2021 and placed on the market before 1 May 2021, even if they will never be placed on the market after that date (thus never bearing the new label)?	<p>No. No retrospective registration is required for tyre types whose units will not be placed on the EU market after 1 May 2021.</p> <p>On this, recital 37 of Regulation (EU) 2020/740 clarifies that no re-labelling of individual tyres is required for those already placed on the market before 1 May 2021 (date of application of Regulation (EU) 2020/740).</p>
4	3 (14) 3 (15) 5	<p>If the official ‘Supplier Administrator’ of EPREL is located in an EU country, can the ‘Suppliers user’ of EPREL be located in non-EU Countries?</p> <p>More in general, can a tyre manufacturer not established in the EU access the registrations concerning its tyres which have been entered into EPREL by an importer or authorised representative established in the EU?</p>	<p>The supplier formally registering the product and necessarily established in the Union (or EEA) is solely responsible for the data entered in the database and remains liable, whoever and wherever the data has been input.</p> <p>Agreements between the importer or authorised representative and the manufacturer established outside the EU are not regulated in the context of the tyre labelling Regulation (EU) 2020/740 (nor of the framework labelling Regulation (EU) 2017/1369).</p> <p>No operator established outside the EU/EEA shall be regarded as a supplier under Regulation (EU) 2020/740.</p>
5	4.1	<p>Is the “printed tyre label” as of Article 4.1 (b) intended as necessarily printed on paper or can it also be “printed on a display” or be a “printable” information transmitted in a digital file?</p> <p>For the provision of tyre labels in electronic form, is a delegated act foreseen?</p>	<p>Individual units of tyres made available on the Union market have to bear a sticker, or be accompanied by a printed label in the case of batches of identical tyres.</p> <p>The Regulation refers to an electronic version of the label as a “label in electronic form” and not as “printed on a display” (see definition of ‘tyre label’ in Article 3(5)).</p> <p>The format of tyre labels (both in printed and electronic form) is set out in Annex II.</p> <p>Article 13(1)(a) empowers the Commission to adopt delegated acts in order to amend Annex II with regard to the content and format of the tyre label.</p>

6	4.1 5.1 6.1	Is the QR code giving access to the product information sheet (PIS) and the label in a visible form?	Yes. The QR code leads to the label and the product information sheet as stored in EPREL: they appear on the display of a QR reader, such as a smartphone or a tablet.
7	4.1 5.1 6.1	<p>How is the supplier giving the information to the distribution chain?</p> <p>Is the provision of the QR code enough?</p> <p>Is it a tyre manufacturers' obligation to provide the PIS or is it sufficient that the distributor goes to EPREL and downloads the PIS to fulfill its obligations?</p>	<p>Article 4 states all obligations of tyre suppliers regarding the provision of labels and product information sheets (PIS).</p> <p>For some specific elements of the distribution chain, provision of a QR code or of the equivalent humanly readable URL may be useful. However no requirement or provision is explicitly mentioned in the legislation.</p> <p>Once the tyre type is registered in EPREL and the “date of placing on the market” occurred/passed, anyone can automatically download a PIS from the public part of the database and in any official language of the EU.</p> <p>The tyre suppliers' obligation is to accompany individual tyres by a printed label and by a PIS. Making accessible the PIS seems enough. However the specific case in which tyres are sold or offered by distance, the supplier has to provide the end-user with a printed format if requested.</p> <p>Article 6 states that at the point of sale, distributors have to make the product information sheet available, including, upon request, in printed form. Consequently, the distributor should be able to provide the PIS in a printed form if requested.</p>
8		Regulation (EU) 2020/740 does not require that label values are printed on the invoice anymore: what information (in which form) could be supplied to the end-user (e.g. on the invoice) in order to allow him/her access to the label/PIS information of the product(s) he bought? Is it required/useful to print the corresponding QR-Code or the URL leading	<p>The tyre label is intended as an aid to support the user in an informed purchase decision. It is crucial, therefore, that the user can see the label (and, if desired, the product information sheet) “before” taking the purchase decision. No obligation of displaying the label has been set for any document produced “after” the payment or similar commitment by the customer.</p> <p>It is obviously permitted to document the choice of the customer, once done, and for this a QR code or the human-readable equivalent URL could be printed in the invoice or</p>

		to the EPREL database to meet the obligations of the regulation? Or, as alternative, is it possible to add parts of the technical promotional material information (Annex IV) on the invoice (e.g. “A, B, B, xx dB, 3PMSF and ice pictogram”)?	analogous post-sales document.
9	4.1 6.1	Since the QR code is available with each tyre unit or batch, can “accompanied” be understood as fulfilling the obligations regarding the PIS?	<p>Yes, under some conditions</p> <p>The word “accompanied” is used in the Regulation (EU) 2020/740 in Article 4: “Suppliers shall ensure that [...] tyres [...] are accompanied free of charge”:</p> <ul style="list-style-type: none"> • by a tyre label (in the form of a sticker for individual tyres or by a printed tyre label for a batch of identical tyres) and, • by a product information sheet (PIS). No clear indication is given as to the format of the PIS. <p>Article 3(8) defines the ‘product information sheet’ as a standard document containing the information set out in Annex III in printed or electronic form. If the product information sheet can be obtained in electronic form by scanning the QR code on the label (as printed on a physical support), this fulfils the obligation to accompany the tyres by the PIS unless the end customer requests a printed form.</p>
10	7	<p>Obligations on vehicle suppliers and vehicle distributors</p> <p>How should “intend to acquire a new vehicle” be interpreted?</p> <p>Do vehicle suppliers have to provide the required information only to those “going to order a vehicle”, thus signing a contract, or also to visitors of the vehicle store but not necessarily going to sign a purchase agreement?</p>	<p>The label, with the pPIS, has to help the end-user in making an informed purchase choice.</p> <p>The provision of the tyre label should not be intended as a mere document to attach at the time of signature, but as part of the technical promotional material provided to influence the purchase decision. This appears particularly relevant if the vehicle is proposed with different rims of different size and thus different tyres types that may have an influence on the energy consumption of the vehicle, whatever “fuel” it uses (including electricity).</p> <p>“Intend to acquire” suggests that the decision is close to be taken but not formalised yet, i.e. with the signature of a reservation, order or purchase contract. Therefore, at the very latest before such an irreversible action, vehicle suppliers and vehicle distributors have to provide this element of complementary information as, in principle, may it influence</p>

		How should “before the sale” be interpreted? Just right before the customer signs the order contract or should the information be displayed at the point of sale (both in brick&mortar garage and on line for on-line sales)?	<p>their purchase choice (e.g. on which rims and tyre combination).</p> <p>This has to be considered as applicable not only for a vehicle displayed in a store, but also for on-line sales.</p>
11	7	<p>Obligations on vehicle suppliers and vehicle distributors</p> <p>(a) Would an electronic format-only of the label and product information sheet be considered to be compliant?</p> <p>(b) If the information is provided as part of the documentation addressed to any customer (i.e. product brochures and flyers), can the obligation be considered fulfilled?</p>	<p>(a) That depends. Article 7 does not refer to any specific media support for the label, thus a label in electronic format appears to be acceptable if the remaining vehicle information is provided in the same way.</p> <p>(b) Yes. The obligation can be considered to be fulfilled if the information on the tyre label and in the relevant technical promotional material is part of the documentation provided to the end-user “intending to acquire” a new vehicle.</p>
12	7	For vehicle suppliers, would a print-out or an electronic format attached to the sales contract be fulfilling the “before the sale” requirements?	No, unless the customer can see the label “before the sale”, i.e. at the very latest before the sales contract is signed (if on paper) or the button to confirm the purchase is pressed (for on-line sales).
13	7	<p>Vehicle suppliers need time to update documents. For vehicle suppliers, which is the date of start of application? Is it 1 May 2021, irrespective of the date of placement on the market of the tyres and/or of the vehicle? Can vehicle manufacturers still propose the label as from Regulation (EC) No 1222/2009 until the tyre types already placed on the market before start of</p>	<p>Until the specific tyre type part of the OEM is registered in EPREL, the vehicle supplier cannot access the information related to the tyre type. Thus, the information can be updated only after the tyre supplier has registered the tyres in EPREL. Therefore, there is no alternative than showing the previous label.</p> <p>Moreover the new label classes do not change between the old and the new label (apart from a downscaling of of classes E and F to eliminate the empty D class), consequently the new label is not going to change the customer purchase choice.</p>

		application are finally registered (i.e. at the latest by 30 November 2021)?	
14	7	Are vehicle manufacturers deemed responsible for any inaccuracy of the tyre label as provided by the tyre supplier?	No. As from Article 4 point 6, suppliers shall ensure the accuracy of the tyre labels and product information sheets that they provide.
15	7	<p>What happens if a vehicle is imported fitted with tyres not already placed on the EU market?</p> <p>For tyres not placed on the EU market as replacement tyres and only delivered mounted on a new car imported in the EU, who should be responsible for registration of the tyre in the product registration system EPREL? And, in general, what are the obligations for imported vehicles in respect to tyres?</p>	<p>Vehicle manufacturers or vehicle importers placing on the EU market vehicles equipped with tyres not already placed on the market, act as importers of those tyres, with all related obligations.</p> <p>In other terms, the vehicle importer acts as tyre importer as well.</p>
16	7	<p>A vehicle supplier may not have certainty about which specific tyre type will be available before a certain time (e.g. because of tyre production scheduled in lots, or stocks depleted).</p> <p>In some cases, many months may elapse between the order and the factual production of the car, during which the availability of tyres may change.</p>	<p>The label description in Annex II includes ‘Trade name or trademark of the supplier’ as a mandatory element among other technical characteristics.</p> <p>The vehicle supplier shall inform the customer of the tyres types possibly equipping the car he/she is going to purchase. If multiple tyre types can be used, the information (i.e. the label and PIS) should be made available for each of them.</p> <p>The sales contract may regulate a situation where, for reasons unpredictable at the time of the signature, the car has to be finally delivered with a different tyre type.</p>

17	7	For vehicle manufacturers, does the obligation of providing the label and the PIS arise at the time of final delivery of the vehicle, i.e., have the labels of the tyres finally equipping the car to be delivered as part of the documentation provided to the end-user?	<p>No, there is no such obligation.</p> <p>The Regulation assumes that the label and the PIS must be an instrument of an informed purchase choice, thus providing information ‘before the sale’.</p>
18	7	When a vehicle is provided to the end-user, should the tyres bear the sticker on/in it? If not, why?	<p>No. There is no such obligation.</p> <p>The Regulation assumes that the label and PIS must be an instrument of an informed purchase choice.</p>
19	Annex VII	EPREL allows to enter the technical information on 6 different documents for providing the required information numbered (a) to (f), as from point 2 of Annex VII; however all the information may be easily provided in a single document. Can a single document be uploaded?	<p>Yes. All information can be provided in a single document.</p> <p>A specific and non-mandatory form for this purpose is available, thus helping to streamline this specific control by Market Surveillance Authorities:</p> <p>https://circabc.europa.eu/w/browse/4809c281-c325-43e1-b277-1c5393d2c47f</p>
20	Annex VII	<p>Is it possible to update the information entered into EPREL (Annex VII report) after the tyre has been first placed on the market?</p> <p>Which changes are possible?</p>	<p>Once the registration of a type tyre is completed and the date of placing on the market occurs, some changes are not possible anymore and some others remain possible with a reason for the change to be provided in a specific notes field (this can be done either with automatic transfer or by using the GUI). These changes are logged (author, date and time).</p> <p>For convenience, the accepted reasons are listed:</p> <p>Correct typo: supplier made a mistake when declaring a value and has to correct it.</p> <p>Change in standards: the testing standards can be amended and thus some values need to be modified.</p>

			<p>Label scale-range change, e.g. as result of amendment of the type approval legislation.</p> <p>Request to change declaration by market surveillance: If an MSA detects an error or mistake that does not need a new registration, it can ask the supplier to modify some values of a registered model.</p> <p>Correction without changes in declaration: during the lifecycle of a tyre type it might occur, that either the company itself produces more helpful information, or clarification, or that it turns out that for communication with MSA this correction would speed up their understanding (though strictly speaking not legally necessary). Additional information, that does not change in such a case the model, cannot lead to a compulsory change in model number (=no new registration).</p> <p>Request to change declaration by an external body: Certification Bodies very frequently detect errors in declared data, sometimes typing mistakes, many times performance data that, after testing in an independent laboratory, need correction (“re-rating”). Data linked to a product can represent up to dozens of values, and it can happen that one, a few, or more, need adjustment.</p> <p>More details can be found in the Wiki user user guidelines: https://webgate.ec.europa.eu/fpfis/wikis/display/EPREL/EPREL+Guidelines</p>
21	Multiple	<p>What is regarded as “technical promotional material”?</p>	<p>The definition of technical promotional material is given in Article 3(7) of the tyre labelling Regulation:</p> <p><i>“technical promotional material’ means documentation, in printed or electronic form, that is produced by a supplier to supplement advertising material with the information set out in Annex IV”</i></p> <p>Recital 24 provides more details:</p> <p><i>“Potential end-users should be provided with information explaining each component of the tyre label and its relevance. That information should be provided in all technical promotional material, for example on suppliers’ websites, but should not be required in visual advertisements. Technical promotional material should not be understood to include advertisements via billboards, newspapers, magazines or radio or television</i></p>

			<i>broadcasts”.</i>
22	6	There are storage situations along the distribution chain, where tyres will never be seen by the end-customer, especially in the case of truck tyres. Are these storage situations also understood to be points of sale where the tyre label needs to be displayed?	<p>Storage locations in the premises of the tyre manufacturer before any commercial transaction has taken place, are not covered by any obligation in respect to labelling.</p> <p>Storage areas in the premises of a distributor where tyres are neither displayed nor offered for sale to customers is not considered as a point of sale to which Article 6 applies.</p> <p>When tyres are stored in the premises of a distributor and not displayed and offered for sale to customers, no requirement for displaying the label or the PIS apply. However Article 6.4 is applicable <i>“Distributors shall ensure that where tyres offered for sale are not visible to the end-user at the time of sale, they provide the end-user with a copy of the tyre label before the sale”.</i></p>
23	Multiple	Are tyres inside a container just downloaded at the harbour or on a truck passing customs at an EU border already considered as “placed on the market” and thus covered by obligations as from Article 4?	<p>Not always. It depends on whether the individual tyres or batches have been subject to a commercial transaction, or not yet. According to the Blue Guide, the first making available of a product supposes an offer or an agreement (written or verbal) between two or more legal or natural persons for the transfer of ownership, possession or any other right concerning the product in question after the stage of manufacture has taken place. Being unloaded at a harbor or passing customs is in itself not sufficient to consider that a tyre has been placed on the market. However, in most cases, tyres unloaded at the harbor or passing the border are already subject to an agreement and can hence be considered as placed on the market, thus those tyres must bear an individual label sticker, or, for batches, “a printed label” must accompany them.</p>
24	Multiple	Is the transfer of a tyre from the company production line to its own stocks in EU before distribution (so no commercial activity is involved yet) to be considered as placing on the EU market, making available on the market?	<p>If the individual tyre or batches are stored in the manufacturers’ warehouse and have not been subject yet to any commercial transaction, this means that they have not been placed on the market. According to the Blue Guide, placing on the market is about first making available a product and it assumes that an offer or an agreement (written or verbal) had been concluded between two or more legal or natural persons for the transfer of ownership, possession or any other right concerning the product. However in most cases, tyres stored in a distributor’s warehouse may have been already subject to an agreement between two legal or natural persons and can hence be considered as “placed on the market”, or further made available in the supply chain e.g.: from a distributor to another distributor.</p>

			<p>Otherwise said, it is not a matter of physical transfer (plant/warehouse) but of written or verbal agreement between two or more legal or natural persons for a transfer of ownership that triggers the placing on the market / making available the product in question after the stage of manufacture has taken place.</p>
25	Annex I, part E	<p>For assessing ice grip performance, the Regulation does not indicate a specific standard. What are the testing standards to be used? Is a delegated act foreseen to indicate such a standard and how it should be used?</p> <p>At which moment can the ice grip pictogram of a tyre, which has been tested according to ISO 19447 and satisfies the relevant minimum ice grip index values, be part of the label?</p>	<p>Recital 14 clearly refers to ISO 19447 as the only standard for measuring the ice grip index.</p> <p>The ice pictogram can only be placed on the new label, which will appear for end-users only after 1 May 2021(date of application). A tyre may be tested at any time once the standard is published (and a facility becomes available to perform the necessary test according to what is indicated in the standard).</p>
26	Annex I, part E	<p>Can C2 or C3 tyres labels bear the ice pictogram?</p>	<p>No. At the date of writing this document, the standard ISO/DIS 19447 “Passenger car tyres — Method for measuring ice grip performance — Loaded new tyres” only covers the testing method for C1 tyres. Until this standard will be updated, to cover C2 or C3 tyres, no C2 or C3 tyre can be tested and, consequently, no C2 nor C3 tyre can bear the ice pictogram.</p> <p>Consequently, only C1 tyres with ice braking performance level above the threshold as from ISO 19447 can display the “ice pictogram” on the label.</p> <p>The subject matter of the Tyre Labelling Regulation (EU) 2020/740 in its Article 1, justified by Recital (9), is to provide harmonized information on tyre parameters to allow the end user to make an informed choice. It is also essential to prevent that testing results obtained by market surveillance authorities are different from the testing results declared by the suppliers.</p> <p>This is possible only with the use of a reliable, accurate and reproducible method, and at the condition that no alternate method providing different information is used.</p>

27	2, 3	Is the mini-spare in the scope of this Regulation?	Article 2.(c) lists T-temporary-use spare tyres as out of scope of the Regulation. The definition in article 3.(3) refers to ‘T-type temporary-use spare tyre’ as a temporary-use spare tyre, regardless of its size.
28	6	Is it sufficient that the distributor/tyre dealer visualises and explains to the potential customer the corresponding tyre label (and PIS if required) on a computer/tablet screen before the sale (if the tyres are not visible to the end-user)?	<p>Yes. Article 6(4) reads “Distributors shall ensure that where tyres offered for sale are not visible to the end-user at the time of sale, they provide the end-user with a copy of the tyre label before the sale.” According to the definition in Article 3(5), a “tyre label’ means a graphic diagram, in printed or electronic form [...]”.</p> <p>So an electronic form would be accepted for tyres not visible in the shop.</p>
29		<p>Can the labels be printed in a reduced size on technical promotional material?</p> <p>In technical documentation, technical promotional material, quotations, sales contracts, invoices and other material, the labels of tyres, if printed with correct size (i.e. 75x100 mm), may take the largest part of the space.</p>	<p>Annex II of Regulation (EU) 2020/740 mandates a minimal label size of 75x100mm.</p> <p>Any technical promotional material shall display the tyre labels. No requirement on the size for the labels displayed electronically is specified. In particular, Article 4.2 and 6.7 read for tyres sold or offered for sale by distance selling “ The size of the tyre label shall be such that it is clearly visible and legible and shall be proportionate to the size specified in point 2.1 of Annex II.”</p> <p>Moreover, it is technically impossible to respect a size in millimetres or centimetres on an electronic screen because the size varies depending on the “resolution” of the screen.</p>
30	Annex I Part D	Tyre grading classes and snow grip qualification are determined by the tyre manufacturer using the methods of R117, or ISO 19447 for ice grip qualification. At the moment of attributing the grading class, the applicable versions of the R117 or ISO test procedure and test report are used and documented. Testing methods can change over time, with possible consequence on tyre grading. How can suppliers deal with these changes?	As with VECTO Regulation (EU) 2017/2400, conformity is assessed using the testing methods in force at the moment of the measurement and of the registration in EPREL. The precise version of the testing method and the date of testing have to be indicated in the technical documentation to be uploaded in EPREL as part of the section «Reference to harmonised standards».

The following table provides a summary of the obligations for labelling and for registration in EPREL in respect to the date of production and the date of placement on the market, for all possible scenarios.

Table 2

Tyre produced	Tyre placed on the market	Obligation for suppliers to accompany tyres with printed labels along the requirements under Annex I, to IV (Article 4.1 Regulation (EU) 2020/740)	Obligation to upload information in EPREL (Article 5.1. 5.2 & 5.3, Annex VII Regulation (EU) 2020/740)
Before 25 June 2020 (up to 2620)	Before 25 June 2020	No ²	On a voluntary basis
	Before 1 May 2021	No ²	On a voluntary basis
	After 1 May 2021	No	On a voluntary basis
Between 25 June 2020 and 30 April 2021 (2720 to 1721)	Before 1 May 2021	No ²	No
	After 1 May 2021	No until 30 November, Yes from 1 December	Yes, by 30 November 2021
From 1 May 2021 (from 1821)	After 1 May 2021	Yes	Yes, before placing on the market

² C1 and C2 tyres in this situation, anyhow, must bear the label as of Regulation (EC) No 1222/2009.