

Rubber and Plastic Products

1. Introduction

Chapters 39 and 40 of the EC's Common Customs Tariff (CCT) detail imports of rubber and their derived products. Raw rubber and rubber products attract lower rates of duty. Raw rubber (either natural or synthetic) is allowed free entry into the EC while tyres and inner tubes are charged at 5.8%. Conveyor belts bear the highest duty in this product category of 10%. Plastic and its derived products attract duties of 7-12.5%. Plastic packaging is charged 8.4% while plastic in its primary form attracts 12.5% customs duties. All rubber and plastic products for civil aircraft are allowed free entry into the EC.

Although there is no EC legislation directly related to these chapters of the CCT, legislation applies to broad product categories, for example construction products or personal protective equipment which include rubber and plastic products.

2. Construction products

The EC has issued legislation setting down the following essential requirements for construction products:

- ◆ Chemical resistance and stability
- ◆ Safety in case of fire
- ◆ Hygiene, health and environment
- ◆ Safety in use
- ◆ Protection against noise
- ◆ Energy economy and heat retention.

Depending on the intended use of the product and subsequent technical requirements to be issued, all, some, one or none may be relevant. The European Standards bodies, CEN and CENELEC, have been given the mandate to produce suitable European standards for groups of construction products in line with this legislation.

At present 32 draft provisional mandates for product standards are under review. Plastic construction products such as doors, roofs, floors and drainage are included in this list of proposals. Products which meet the established requirements can qualify for the CE mark to be affixed to the product, label, packaging or accompanying commercial documents and can be sold anywhere within the EC.

For more information contact the CEN and CENELEC as detailed in Section 6.

Full details of the Construction Products Directive can be found in the EC's Official Journal OJ L040 of 11 February 1989 ref. 89/106/EEC.

3. Personal protective equipment

Rubber and plastic products sold as personal protective equipment (PPE) must conform with standards laid down by the EC. PPE standards concern various aspects according to the type of product, but all

products must provide the following information:

- ◆ Storage, use, cleaning, maintenance, servicing and disinfection
- ◆ Performance as recorded during technical tests designed to establish the level of protection provided
- ◆ Suitable accessories and the characteristics of appropriate spare parts
- ◆ The classes of protection appropriate to different levels of risk and the corresponding limits of use
- ◆ The obsolescence, deadline or period of obsolescence of PPE or certain of its components
- ◆ The type of packaging suitable for transport
- ◆ The significance of any marking.

Full details on both product standards and accompanying information are given in the EC Official Journal, OJ L399 of 30 December 1989, ref. 89/681/EC.

4. Packaging Products

The protection of the environment has become a major concern of the EC. Legislation on packaging and packaging waste is expected in the very near future. All packaging must comply with the following essential requirements:

- ◆ Minimise weight and volume compatible with safety and consumer requirements
- ◆ Be designed, produced and marketed so as to permit its re-use, recycling or recovery for energy etc., according to stated criteria, and so as to minimise its environmental impact on final disposal
- ◆ Minimise content of hazardous substances.

Packaging will have to be marked with EC symbols to indicate whether it is reusable or recyclable under rules to be implemented in each member state within 5 years of the EC legislation.

The EC will also establish a system of identification and classification of packaging materials used. Plastics shall use a number from 1 to 19, paper and cardboard from 20 to 39, metal from 40 to 49, wood from 50 to 59, textiles from 60 to 69, glass from 70 to 79. Identification may also be done by using abbreviations (e.g. HDPE: high density polyethylene).

The EC is also expected to issue European standards in packaging relating in particular to:

- ◆ Dimensions and shapes of packaging for agreed products in order to facilitate their re-use
- ◆ Product specifications for the use of recycled materials in the manufacturing of packaging and other products.
- ◆ Modular distribution packaging for transport.

Please refer to Part I, Chapter 2 for more details on packaging in the EC.

5. Automotive Parts

EC legislation with respect to motor vehicles has harmonised EC type approval procedures. Type approval means that a type of vehicle, system or component is approved and certified to meet technical requirements of performance and safety specified by the EC and is marketable throughout the Single European Market.

Tyres

EC legislation for motor vehicles includes the establishment of standards for car components including tyres. Tyres must undergo type approval and have a type approval certificate before being marketed in

the EC. Tyres for passenger vehicles must have a minimum tread depth of 1.6mm in the main groove of the tyre surface. Main grooves means that the broad grooves in the central part of the tread surface, which covers about 3/4 of the width of the tread surface. This particular legislation is expected to have a favourable effect on demand for replacement tyres.

Full information on type approval for tyres can be found in the EC's Official Journal OJ L 129 of 14 May 1992, ref. 92/2/1EEC.

Developments in the tyre market have been forced to keep pace with increasing demands made by vehicle manufacturers. One result is a sharp increase in range of sizes in the tyre market. There were 186 different car tyre sizes in 1986, but this number had risen to 306 by 1991. Higher speed rated tyres have become more popular in the Europe.

Recycling of tyres is now a big environmental issue and tyre manufacturers are compelled to find some solution for recovery of raw material or total destruction of worn or non-retreadable tyres. Legislation on this issue may be demanded in the future.

Other Rubber Components

Durability and precision in rubber components is demanded in the automotive industry. New and better designs for vehicles have meant longer lasting and more reliable component parts. V-belts used for driving shafts in engines, alternators, oil and water pumps and air conditioner compressors are expected to endure for over 160,000 km compared with the current average of 50,000 km. Developments in rubber technology involving the use of compound materials have brought new products which can stand temperatures of up to 140 °C. Rubber compounds have found new applications in automotive and other industries, so Commonwealth manufacturers will have to face a more technologically advanced market.

6. Further Information and Contact Points

TRADE ASSOCIATIONS	TRADE FAIRS & EXHIBITION
1. <i>Liaison Office of the Rubber Industries of the EC (BLIC)</i> Rue des Arts 3 Boite 12, B-1040, Brussels Belgium Tel: +32 2 218 4940 Fax: +32 2 218 6162 2. <i>International Federation of National Associations of Tyre Specialists and Retailers (BIPAVER)</i> P.O. Box 7190 CH-8023 Zurich Switzerland Tel: +41 136 13060 Fax: +41 136 28351 3. <i>European Association of Plastic Packaging Manufacturing</i> 6 rue Jardin F-75017 Paris France Tel: +33 1 46 22 33 66 Fax: +33 1 46 22 02 35 4. <i>European Plastic Convertors</i> 66 Avenue de Cortenberg B-1040 Brussels Belgium Tel: +32 2 732 4124 Fax: +32 2 732 4218	1. <i>EUROPLAST International Plastic and Rubber Exhibition</i> Location: Paris - Nord/Villepinte, France Contact: ADMS 1040 ave Albert Len 92563, Rueil Malmaison Paris, France Tel: +33 1 47 52 94 14 Fax: +33 1 47 52 94 35 Frequency: Every 4 years in June Next fair - 1994 2. <i>K International Trade Fair in Plastics and Rubber</i> Location: Messegelände, Dusseldorf, Germany Contact: "NOWEA" Postfach No. 320203 4000 Dusseldorf, 30 Germany Tel: +49 211 456001 Fax: +49 211 4560668 Frequency: Every 2 years in November Next fair - 1994 3. <i>REIFEN International Trade Fair for Retreading, New Tyres, Tyre Trade</i> Location: Messegelände Frankfurt, Germany Contact: Messe Essen GmbH Messehaus Ost Norbertasse D-4300 Essen 1 Germany Tel: +49 201 72440 Fax: +49 201 7244248 Frequency: Every 2 years in May Next fair - 1994

- 1. European Commission**
200 Rue de la Loi
1049 Brussels
Belgium
Tel: +32 2 299 1111
- 2. European Standardisation Committee (CEN)**
Rue de Stassart 36
B-1050 Brussels
Belgium
Tel: 32 2 519 6811
Fax: 32 2 519 6819
- 3. European Committee for
Electrotechnical Standardisation (CENELEC)**
Rue de Stassart 35
B-1050 Brussels
Belgium
Tel: +32 2 519 6871
Fax: +32 2 519 6919
- 4. International Tyre Association**
328 Hall Road
Hebron CT 06248
U.S.A.
Tel: +1 203 2284739
Fax: +1 203 2289772
- 5. Plastic and Rubber Institute**
11 Hobart Place
London. SW1W 0HL
United Kingdom
Tel: +44 71 245 9555
Fax: +44 71 823 1379

Product Coverage

CCT NUMBER	PRODUCT DESCRIPTION
401110	New pneumatic tyres for motor cars
401120	New pneumatic tyres for buses and lorries
401140	New pneumatic tyres for motor cycles
401150	New pneumatic tyres for bicycles
401191	Tyres with "herring-bone" or similar treads
401210	Re-treaded tyres not for civil aircraft

Customs Duties

CCT NUMBER	FULL	ACP	GSP	LDDC
401110	5.8%	0%	0%	0%
401120	5.8%	0%	0%	0%
401140	5.8%	0%	0%*	0%
401150	5.8%	0%	0%*	0%
401191	5.8%	0%	0%	0%
401210	5.8%	0%	0%*	0%
401220	5.8%	0%	0%	0%

* Imports of certain types of tyres from GSP countries enter the EC free of customs duties within the limit of a ceiling. Imports beyond the ceiling may be subject to the full rate of duty

Product and Standards

The success of the modern steel belted radial car tyre has increased product life to between 37,000 and 50,000 miles compared to the 20,000 miles of the old cross-ply tyre. Radial tyres now account for 99% of tyre production for cars and vans in Europe. The most important characteristics of car tyres are listed below:

- a) Speed rating; car tyres are designed for safety up to a set speed and given a speed rating. There are lower speed rated tyres and higher speed tyres for up to 240 m.p.h.
- b) Car tyres vary in their ability to handle different road and weather conditions. There is usually a trade-off between a tyre's road grip and its durability. Moreover a tyre which has a good wet road grip may not perform so well under other road conditions.

- c) Durability; the length of life of a tyre will partly depend on its speed rating and road grip characteristics.
- d) Other aspects of tyre performance, such as comfort of ride, noise and vibration.
- e) Standard or low profile tyres; a recent trend has been in the demand for low profile tyres designed for high-performance cars. Low profile tyres are low, squat type of tyres with a greater surface area of rubber in contact with the road for better road-holding performance.

The most important characteristics of truck tyres are safety, economy and re-treadability. Recent developments in truck tyres have been the development of low rolling resistance tyres (increased fuel economy), an increase in the number of lightweight and low profile tyres (to improve braking efficiency) and tyres which generate less noise.

Europe is also showing environmental concern and this has been reflected in the tyre industry. Replacement tyres are expected to have lower rolling resistance and lower CO₂ emission. Re-tread tyres play a much larger role now particularly in the bus and truck market as manufacturers are concerned about the environmental impact of disposing of old tyres. EC has set a minimum tread depth of 1.6mm for tyres for passenger vehicles. Road worthiness checks in all EC countries have become mandatory and more frequent which increases the demand for replacement tyres.

Tyres must be submitted for type approval before they can be marketed in the EC.

Marketing and Distribution

Multi-national companies dominate not only the EC but also the world tyre market. It is estimated that 77% of world tyre sales is controlled by 13 companies. In all EC countries the multi-nationals of Michelin, Goodyear, Firestone, Continental, Pirelli, Dunlop and Goodrich have a good stronghold, although parallel imports from non-multi-nationals have held their own in the lower end of the market.

There appears to be a distinct division in marketing of tyres in the EC. The more affluent countries of the EC such as the United Kingdom, France, Germany, Belgium and The Netherlands have a more highly developed retail organisation. Developments such as hypermarkets and quick-fit operators are beginning to replace the traditional tyre outlets of garages and petrol stations. In these countries also the multi-national companies seem to dominate operating their own tyre specialist outlets. In other countries of the EC the market is more fragmented with a variety of dealers and importers. Lower priced, lower quality tyres could have a better chance as the economies in the less affluent regions support fewer new car registrations and demand for higher quality tyres is not as strong as in other more developed regions of the EC. This however is expected to change as strict adherence to road test requirements is enforced in all EC countries. Demand for better quality products will become the norm throughout the EC.

Documentation

Aside from normal shipping and import documents, Certificate of Origin - Form A for GSP and LDDC countries, EUR 1 for ACP countries - must accompany consignments to benefit from reduced tariff or tariff free entry into the EC.

Tyres must be submitted for type approval and manufacturer given a type approval certificate.

Application for approval can be obtained from designated agencies in the EC such as:

UNITED KINGDOM: Vehicle Certification Agency
 1 Eastgate Office Centre
 Bristol. BS5 6XX
 United Kingdom
 Tel: +44 272 515131
 Fax: +44 272 523103

GERMANY: Motor Vehicle Office
Kraftfahrt-Bundesamt (KBA)
Postfach 2063
Fordestrasse 16
2390 Flensburg-Murwik
Germany

FRANCE: Ministere de l'Equipement du
Logement de l'Amenagement du
Territoire et des Trasports
L'Arch de la Defence
92055 Paris
Cedex 04
France

Type approval is indicated by a type approval number marked on the product or packaging and requires no further documentation to enter the EC.

Other Information

Publications

"International Rubber Digest"
Secretariat of the International Rubber Study Group
8th Floor, York House
Empire Way, Wembley. HA9 0PA
United Kingdom
Tel: +44 81 903 7727
Fax: +44 81 903 2848

(information on prices, supply, demand, summarised rubber reports world-wide)

"European Rubber Journal"
Crain Communications Inc.
Cowcross Court
75-77 Cowcross Street
London. EC1M 6BP
United Kingdom
Tel: +44 71 608 1116
Fax: +44 71 608 1173

Associations:

Liaison Office of the Rubber Industries of the EC (BLIC)
Rue des Arts 2
Boite 12,
B-1040 Brussels
Belgium
Tel: +32 2 218 4940
Fax: +32 2 218 6162

European Tyre and Rim Technical Organisation
Avenue Brugman 32
B-1060, Brussels
Belgium
Tel: +32 2 344 4059
Fax: +32 2 344 1234

Trade Fairs:

REIFEN
International Trade Fair for Retreading, New Tyres, Tyre Trade
Location: Messegelände
Frankfurt, Germany
Contact: Messe Essen GmbH
Messehaus Ost
Norbentasse
D-4300 Essen, Germany
Tel: +49 201 72440
Fax: +49 201 7244248
Frequency: Every 2 years in May
Next fair - 1994

ACP Commonwealth Countries

ACP Commonwealth Countries

Entry Conditions:

Tariff free quota free entry into the EC.

Rules of Origin:

General rules of origin apply to rubber and its derived products. Special rules however apply to the following:

- ◆ laminated slabs of crepe rubber for shoes
- ◆ compounded rubber, unvulcanised
- ◆ tyres, inter-changeable tyre treads and tyre flaps of rubber
- ◆ articles of hard rubber.

Documentation:

Certificate of Origin (EUR 1) must accompany products if the exporter is to benefit from tariff free entry into the EC. These forms can be obtained from the exporting country's national Customs and Excise office or Ministry of Trade.

GSP Commonwealth Countries

GSP Commonwealth Countries

Entry Conditions:

The following products are allowed entry into the EC free of Customs duties within the limits of a ceiling:

- ◆ polyethylene having specific gravity of 0.94 or more
- ◆ polymers of styrene, in primary forms
- ◆ polymers of styrene in waste, paving or scrap
- ◆ other plates, sheets, film, foil and strips of plastic
- ◆ polymers of vinyl chloride
- ◆ tubes, pipes and hoses of plastic
- ◆ articles of clothing including gloves
- ◆ tyres and inner tubes of rubber

Imports beyond the ceiling may be subject to the full rate of duty.

Rules of Origin:

General rules of origin apply to rubber and its derived products. Special rules apply to the following:

- ◆ laminated slabs of crepe rubber for shoes
- ◆ compounded rubber, unvulcanised
- ◆ tyres, inter-changeable tyre treads and tyre flaps of rubber
- ◆ articles of hard rubber

Special rules of origin apply to all plastic products in primary form or as a finished product. In the case of articles of plastic (i.e. packaging, tableware, buildersware, etc.), the value of the material or component not from the GSP country used in the manufacture of these goods must not be more than 50% of the value of the final product.

Documentation:

Certificate of Origin (Form A) must accompany products if the exporter is to benefit from tariff free entry into the EC. These forms can be obtained from the exporting country's national Customs and Excise office or Ministry of Trade.

LDDC Commonwealth Countries

LDDC Commonwealth Countries

Entry Conditions:

Tariff free and quota free entry into the EC.

Rules of Origin:

General rules of origin apply to rubber and its derived products. Special rules apply to the following:

- ◆ laminated slabs of crepe rubber for shoes
- ◆ compounded rubber, unvulcanised
- ◆ tyres, inter-changeable tyre treads and tyre flaps of rubber
- ◆ articles of hard rubber

Special rules of origin apply to all plastic products in primary form or as a finished product. In the case of articles of plastic (i.e. packaging, tableware, buildersware, etc.), the value of the material or component not from the LDDC country used in the manufacture of these goods must not be more than 50% of the value of the final product.

Documentation:

Certificate of Origin (Form A) must accompany products if the exporter is to benefit from tariff free entry into the EC. These forms can be obtained from the exporting country's national Customs and Excise office or Ministry of Trade.

Figure 5.1

MODEL
(maximum format: A 4 (210 x 297 mm))

EEC COMPONENT TYPE-APPROVAL CERTIFICATE
(tyre)

STAMP
OF ADMINISTRATION

Communication concerning the:

- type-approval (1)
- extension of type-approval (1)
- refusal of type-approval (1)

of a component with regard to Directive 92/23/EEC relating to tyres.

EEC component type-approval No: Extension No:

SECTION I

0. General

- 0.1. Make (trade name of manufacturer):
.....
- 0.2. Commercial description(s):
.....
- 0.3. Means of identification marked on the component (tyre)(a):
.....
- 0.4. List of applicable annexes:
- 0.5. Name and address of applicant:
- 0.6. Address(es) of manufacturing plant(s):
.....

(1) Delete where inapplicable.

(a) The means of identification of type, if used, must appear only on those tyres covered by the individual approval.

If the means of identification of type contains characters not relevant to describe the tyre types covered by this component type-approval certificate (e.g. a date code) such characters must be represented in the documentation by the symbol: '?' (e.g.)
ABC ?? 123 ??)

- the size designation,
- the category of use,
- the load capacity index,
- the speed category,
- whether or not the tyre may be used tubeless,
- whether or not the tyre is 'reinforced' or 'T-type temporary use spare tyre' in the case of passenger car tyres,
- whether or not the tyre is 'regroovable' in the case of commercial vehicle tyres,
- additional load capacity index/indices and speed category symbol.

SECTION II

1. Additional information
- 1.1. The list of rims on which the tyres may be fitted:
2. Technical service responsible for carrying out the tests:
3. Date of test report:
4. Number of test report:
5. Grounds for extending component type-approval (where appropriate):
.....
6. Comments (if any):
7. Place:
8. Date:
9. Signature:
10. A list of documents making up the component type-approval file lodged with the authority that has granted the approval and which may be obtained on request, is attached.