



Mr Phil Bailey
Department for Transport
1/32 Great Minster House
33 Horseferry Road
London SW1P 4DR

22 May 2014

Dear Mr Bailey,

Enforcement of Tyre Labelling Regulations

This is a joint response from RoSPA and PACTS to the DfT's consultation on the Enforcement of Vehicle Tyre Labelling Regulations. We thank the Department for the opportunity to comment on the proposals.

Tyres are fundamental to road safety, being the only point of contact between the vehicle and the road surface. Clearly, tyres that provide better stopping performance help to improve road safety and reduce the risk of collisions. We welcome the improvements to the tyre labelling regulations, which we believe will help consumers and vehicle owners to ensure that they use safer tyres.

Our preferred enforcement option is option 1c, "a risk-based enforcement approach and the use of both criminal law and civil sanctions". We believe that the wider range of civil sanctions will be more flexible and provide the tyre enforcement authority (the National Measurement Office) with more tools to ensure compliance. We also believe that it will help with the education and warning approach specified in the consultation paper, rather than only relying on criminal sanctions.

Of course, the real test of any enforcement regime is how it is implemented in practice. To be a credible deterrent it requires tyre retailers to understand that inspections and enforcement will take place. We are concerned that budget and staff cuts in the public sector may severely restrict the number of inspections and the level of enforcement, which in turn will reduce the credibility and deterrence of the enforcement regime.

We understand the desire to limit the burden on business and to comply with the Hampton principles, and we believe these are consistent with enforcement option 1c. We have no objections to the "simplification of existing tyre regulations" (as included in option 2) provided this does not water down the safety requirements for tyres.

Yours sincerely,

Kevin Clinton
Head of Road Safety
RoSPA

David Davies
Executive Director
PACTS