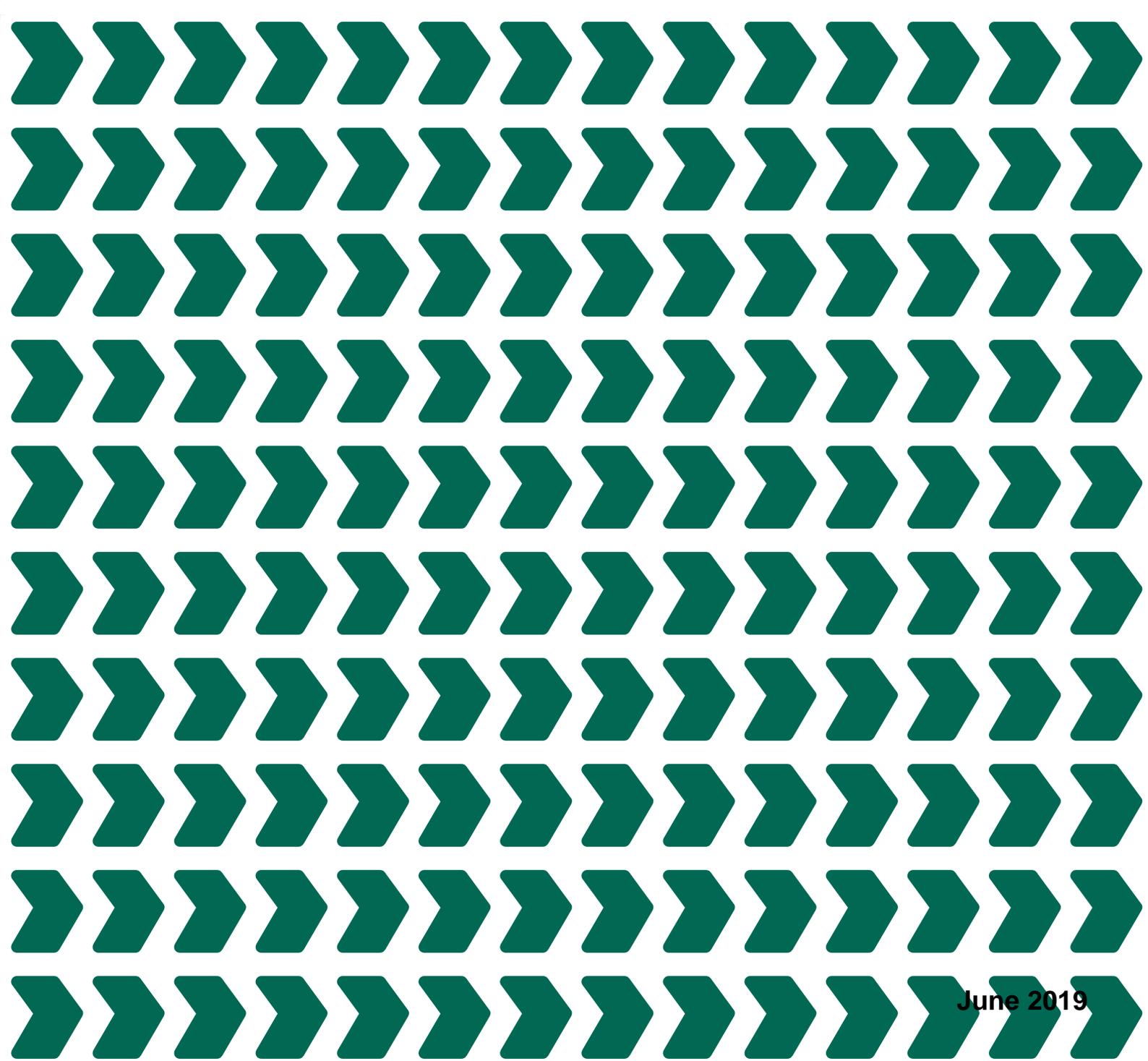




Department
for Transport

Banning Tyres Aged 10 Years and Older Consultation Document

Moving Britain Ahead



June 2019

The Department for Transport has actively considered the needs of blind and partially sighted people in accessing this document. The text will be made available in full on the Department's website. The text may be freely downloaded and translated by individuals or organisations for conversion into other accessible formats. If you have other needs in this regard please contact the Department.

Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR
Telephone 0300 330 3000
Website www.gov.uk/dft
General enquiries: <https://forms.dft.gov.uk>



© Crown copyright 2019

Copyright in the typographical arrangement rests with the Crown.

You may re-use this information (not including logos or third-party material) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/> or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

Contents

Foreword	4
Executive Summary	6
How to respond	7
Freedom of Information	7
1. The Proposals	9
Introduction	9
2. HGVs, Heavy Trailers, Buses, Coaches and Minibuses	10
Our Proposal	10
Rationale	10
Implementation	13
Exemptions	13
Date of Implementation	14
Enforcement	15
Impact Assessment	15
Environmental Impacts	16
3. Taxis and Private Hire Vehicles	17
What will happen next	18
Annex A: List of Consultation Questions	19
Annex B: Consultation principles	21

Foreword



The Department for Transport is committed to delivering road safety for all road users and one route to achieve this is by maintaining a robust legislative framework that ensures the continuous assessment of the roadworthiness of vehicles.

In recent years the safety of older tyres on heavy vehicles has become a matter of increasing concern. In September 2012, a catastrophic failure of a 19-year-old tyre, fitted to the steered axle of a large coach, led to the loss of three lives. The accident investigator concluded that the tyre failure was as a direct result of its age. Mrs Frances Molloy, whose son Michael was one of those killed, has campaigned unceasingly for a ban on the use of older tyres on buses and coaches.

In September 2017, a truck travelling on the M5 suffered a tyre blow-out, crossed the central reservation and collided with oncoming traffic. Five lives were lost in the incident. The Coroner concluded at the inquest, held in February 2019, that the crash was a result of the tyre failure, noting that the tyre was 18 years old and had suffered structural deterioration due to its age. In both collisions, the age of the tyres fitted to the steered axles was considered to have contributed to their failure.

Since 2013, the Department and the Driver and Vehicle Standards Agency has published roadworthiness guidance to advise against the use of tyres aged more than 10 years on buses, coaches and heavy good vehicles except on a rear axle as part of a twin wheel arrangement.

We have been monitoring compliance with the guidance on age: since June 2017 DVSA have inspected 139,320 buses and coaches and found 0.06% to breach the guidance.

The government commissioned research in 2018 with an aim to establish the effect age has on the integrity of road vehicle tyres. As part of this research, the UK's TRL Ltd has worked with a leading laboratory in the United States to carry out testing and analysis. Collectively, this research and the conclusions from the Coroners have provided us with evidence that age does affect tyre performance, but in order to

remove this threat to road safety we are applying the precautionary principle in this case, to introduce a legislative proposal to ban tyres 10 years or older.

In February, Jesse Norman announced the Government's intention to consult on our proposals to legislate against the use of tyres aged 10 years or older on heavy goods vehicles, buses, coaches and minibuses. He also announced that we would consider extending the same requirements to taxis and private hire vehicles, and we are seeking evidence to inform decisions for these vehicle categories.

I believe the changes we are consulting on will save lives and I hope you will respond with your views on this important issue.

Michael Ellis MP

Minister of State for Transport

Executive Summary

Following the Department's announcement in [February 2019](#) to consult on banning the use of tyres 10 years or older on certain vehicle types, the Department has now developed its proposals to implement this legislative change. We are seeking views on these proposals and have included a list of questions for consultees to answer.

The vehicles included in our plans are heavy goods vehicles, heavy trailers, buses, coaches and minibuses. We are also seeking views and evidence on whether to introduce a similar maximum age for tyres fitted to taxis and private hire vehicles.

This consultation will be of interest if you, or your organisation, own or operate any of the vehicle types listed above, or are involved in the maintenance of these vehicle types, or the manufacture, provision and/or maintenance of tyres for these vehicle types. It will also be of interest to drivers and passengers of these vehicles and to the wider public.

We consider that amending the existing Road Vehicle (Construction and Use) Regulations 1986 (SI 1986/1078) (the "Construction and Use Regulations") and using the current, associated enforcement regimes is the most effective method to implement this change for HGVs, heavy trailers, buses, coaches and minibuses. Changes may also be made as appropriate to the Motor Vehicles (Tests) Regulations 1981 (SI 1981/1694) governing roadworthiness testing for light duty vehicles and large passenger carrying vehicles, and to the Goods Vehicles (Plating and Testing Regulations 1988 (SI 1988/1478) for HGVs and heavy trailers, (the "Tests Regulations") to ensure that annual roadworthiness testing contains a proactive check on the age of all tyres. This is therefore a statutory consultation pursuant to the duty to consult in section 195(2) of the Road Traffic Act 1988.

Many factors influence a tyre's integrity including its operational use, storage conditions and maintenance throughout its lifetime. Regulations already exist to ensure tyres meet specific standards including for tread depth and the absence of cuts and lumps that might indicate a structural failure. These proposals are intended to supplement existing Regulations on tyre maintenance and use by adding a further requirement on maximum tyre age. Subject to the outcome of the consultation this will make it an offence to use or operate a vehicle on a road in Great Britain where a tyre fitted to the vehicle exceeds an age of 10 years or where a re-treaded tyre fitted to a non-steered axle exceeds 10 years from its date of re-treading as specified on the tyre wall. It will also be an offence, subject to the outcome of the consultation to fit re-treaded tyres of any age to steered axles of HGVs, buses, coaches and minibuses. The proposals include measures requiring the date of manufacture marking to be visible for the purposes of inspection, and to be maintained and not tampered with.

How to respond

The consultation period began on 23rd June 2019 and will run until 1st September August 2019. Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document, it can be found at <https://www.gov.uk/dft#consultations> or you can contact us using the details below if you need alternative formats (Braille, audio CD, etc.).

Please send consultation responses by email to IVS.Consult@dft.gov.uk

Or by post:

International Vehicle Standards Division

Department for Transport

Great Minster House

33 Horseferry Road

London

SW1P 4DR

0300 330 3000

When responding, please state whether you are responding as an individual or representing the views of an organisation.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Data Protection

The Department for Transport (DfT) is carrying out this consultation to gather views on our proposed ban for older tyres. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation we're asking for your name, your organisation's name and your email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

DfT's privacy policy has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer. You can view it at <https://www.gov.uk/government/organisations/department-for-transport/about/personal-information-charter>.

Your information will be kept securely and destroyed within 12 months after this survey has been closed. Any information provided through the online questionnaire will be moved to DfT's secure internal systems within 2 months of the survey end date.

The Proposals

Introduction

Our intention is to introduce legislation making it an offence to use tyres 10 years or older on certain vehicles. This is to improve road safety for all users. Our current focus is on heavy goods vehicles and larger vehicles used to transport passengers. We are also considering if it is appropriate to extend this legislation to taxis and private hire vehicles, and how to enforce the requirements for these vehicles.

The vehicle types included in our proposals are heavy goods vehicles (category N2 (over 3.5 tonnes but not exceeding 12 tonnes) and N3 (over 12 tonnes), heavy trailers, including semi-trailers (category O3 (over 3.5 tonnes but not exceeding 10 tonnes) and O4 (over 10 tonnes)) and buses, coaches and minibuses (categories M2 and M3).

The full definition of these vehicle categories M, N, and O, which are based on EU Regulations is available at:

<https://www.vehicle-certification-agency.gov.uk/vehicletype/definition-of-vehicle-categories.asp>

We are also seeking views and evidence on extending the ban to taxis and private hire vehicles.

We are not including cars, motor caravans, trailers (3.5 tonnes and under) or caravans (3.5 tonnes and under) in these proposals.

HGVs, Heavy Trailers, Buses, Coaches and Minibuses

Our Proposal

The Construction and Use Regulations specify minimum requirements for the use of tyres on road vehicles in Great Britain. We propose to amend these regulations to include a maximum age for tyres fitted to certain vehicle types, building upon current guidance issued by the Department and the Driver and Vehicle Standards Agency.

There have been two significant road traffic collisions in recent years that led to the tragic deaths of eight people. In both of these collisions, HM Coroner has determined that a contributory factor was a defective tyre fitted to the steered axle of the vehicle. In both cases the age of the tyre was directly linked to its failure.

Following the first collision in 2012, the Department and its Agency issued guidance to vehicle operators setting basic good practice in relation to the use of tyres and only to use tyres over 10 years old when fitted to rear axles (i.e. non-steered) in a twin-wheel arrangement. This advice to operators was based on the precautionary principle of acting to protect people from potential danger.

We are proposing to ban the use of tyres aged 10 years and older on HGVs, heavy trailers, buses, coaches and minibuses, including tyres that have been re-treaded 10 or more years ago. Additionally, we propose to prohibit the use of re-treaded tyres of any age on the steered axles of these vehicle types, in line with the UK tyre industry best practice.

The age of tyres will be defined by the date of manufacture determined from the markings on the tyre sidewall, and the date of re-treading will be defined as the re-tread marking on the tyre sidewall. The dates are those required by UNECE international regulations on tyre construction (UNECE regulations [30](#) & [54](#), [108](#) & [109](#)). The dates provide a consistent record of the age of a tyre which can be observed during routine maintenance, inspection and/or testing, with the possible exception of tyres in a twin-wheel configuration. To address this, we are proposing to mandate the visibility of the date markings on tyres in all configurations, and to make it an offence to drive or operate a vehicle where the date markings are not visible and legible. This means in practice that tyres will need to be fitted to the wheel-rims with the date markings facing outwards.

Rationale

In advance of this consultation we have considered how best to implement an age-related ban for tyres for these vehicle types, balancing the road safety outcomes with

the potential costs and benefits to drivers, operators, UK industry and the environment. We have gathered data that suggests that the vast majority of tyres fitted to heavy duty vehicles are less than 10 years old. However, we want to understand whether there may be impacts associated with a ban on the use of tyres that are 10 years or older, for example on owners of certain vehicle types or for tyre retailers.

We have commissioned specific [research](#) to explore the link between age and tyre integrity. Although the research is not statistically conclusive, it suggests that corrosion is more likely to be found in older tyres and highlights the ability of moisture to penetrate through cuts in the tread area into the structure of the tyre. The research also implies a change in the hardness of the rubber, both in the tread area and the sidewall for older tyres. This hardness can lead to cracking. This research has supplemented our emerging evidence base on this subject and when combined with expert testimony, DVSA data and current roadworthiness guidance we have concluded that a ban on tyres of 10 years or older is a necessary measure to improve road safety. We have considered carefully whether to continue to allow the use of re-treaded tyres in any potential ban. Re-treaded tyres are a key element of the heavy-duty vehicle tyre market (around 30%), providing a cost-effective product to operators, a sustainable solution to recycling worn tyres and employment at UK manufacturing sites.

There are different re-treading processes but these in effect replace the tread on worn tyres by removing some of the existing tyre rubber compound, inspecting the tyre carcass and then adding a new layer of rubber and tread. All re-treaded tyres supplied in the UK must comply with UNECE Regulations 108 & 109 as required by the Motor Vehicle Tyres (Safety) Regulations 1994 (S.I. 1994/3117), and be tested according to the same load and speed criteria as those used for new tyres.

The date of manufacture is imprinted on all first life tyres as part of the manufacturing process and so it is straightforward to determine the age of a tyre (in accordance to UNECE Regulation 30 & 54). During the re-treading process a new date is imprinted on the tyre to signify when the re-treading was completed (in accordance to UNECE Regulation 108 & 109). However, there is currently no legal requirement for a re-treaded tyre to also display the date of its original manufacture.

If we were to propose legislation to ban all tyres 10 years or older, without any consideration of re-treaded tyres, we would effectively be prohibiting the use of re-treaded tyres of any age, since operators would not, under current regulations be able to guarantee that every element of a re-treaded tyre was below 10 years old. The key issue affecting re-treaded tyres is whether they provide the same level of safety as an original (first life) tyre. We do not have any evidence to confirm or dispute this but in the UK, we rely upon the legal obligation that only re-treaded tyres manufactured in accordance with UNECE Regulations 108 & 109 can be placed on the market.

Manufacturers have to ensure that the tyre carcass is suitable to be re-treaded and have various techniques to ensure this is the case before remanufacturing. The Department is not aware of any evidence to suggest that there are systematic weaknesses in the UNECE regulatory requirements. However, as both of the fatal collisions where HM Coroner referenced the age of the tyre as a contributing factor involved tyre failure on the steered axle of the vehicle, we are currently proposing restricting the use of re-treaded tyres of any age from the steered axles, subject to the outcome of this consultation.

The use of re-treaded tyres on axles other than those used to steer the vehicle provides the economic and operational flexibility to vehicle operators, and the environmental benefits of re-treaded tyres. Our current proposals are consistent with the best practice guidance from some members of the UK tyre industry (<https://trucks.michelin.co.uk/Advice/Legislation>) that re-treaded tyres should not be used on the front steered axles of a vehicle. These proposals are subject to the outcome of this consultation.

The other options we have considered are:

- To do nothing and maintain the current position, where no regulations limiting the age of tyres are introduced, and to ensure that existing DVSA guidance for commercial goods and passenger carrying vehicles continues to specify that tyre age is monitored and recorded and that tyres aged more than 10 years old should not be used except on a rear axle as part of a twin wheel arrangement.
- To ban the use of tyres which are 10 years or older, and re-treaded tyres of all ages on all axles of HGVs, heavy trailers, buses, coaches and minibuses. In this option we would effectively be prohibiting the use of re-treaded tyres of any age, since operators would not, under current regulations be able to guarantee that every element of a re-treaded tyre was below 10 years old. This is not the desired outcome of our policy.
- As our proposal, but to allow tyres 10 years and older on heavy trailers. This option would permit older tyres on trailers, which may lead to poorer road safety outcomes than our proposal.
- To only ban the use of tyres which are 10 years or older and re-treaded tyres of any age, on the steered axles. Tyres 10 years and older would be permitted on all other axles and on heavy trailers. Almost all the tyres on heavy vehicles and trailers would be permitted to be older than 10 years in this option, which may lead to poorer road safety outcomes than our proposal.

The costs and benefits of each option are detailed in an impact assessment published alongside this consultation.

Questions on our proposal:

Q1 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.

Q2 Do you agree with our proposal, subject to the outcome of the consultation, to prohibit the use of re-treaded 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.

Q3 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.

Implementation

We consider that amending the Construction and Use Regulations is the most appropriate route to implement this requirement. We propose to achieve this by adding a requirement for maximum tyre age, as listed above, potentially in Regulation 27 (Condition and Maintenance of Tyres), or in a new Regulation in Part C of Part II of the Construction and Use Regulations.

We also propose to amend the Regulations to mandate the visibility of markings on tyres, including in a twin-wheel arrangement, where tyre date markings will need to be displayed on the outer facing sidewalls of the arrangement. We also propose to make it an offence to drive or operate a vehicle when these date markings are not present or illegible.

We have identified an inconsistency in current Construction and Use Regulations that require a first life tyre to comply with UNECE Regulations 30 & 54 (for tyre date markings) when they are first fitted to the vehicle but there are no equivalent requirements for re-treaded tyres. We propose to amend the Construction and Use Regulations to mandate that re-treaded tyres comply with the equivalent UNECE tyre marking Regulations (108 & 109) when they are first fitted. As discussed above, all re-treaded tyres must meet the requirements of Regulations 108 & 109 when they are supplied to the market in the UK.

Changes may also be made to regulations governing roadworthiness testing, as might be appropriate, to ensure, for instance, that compliance with any new requirement is checked as part of annual tests of in-scope vehicles under the Tests Regulations.

As a proposed ban on tyre age would apply in GB only (under the Road Traffic Act), separate measures would be needed for Northern Ireland. The Department for Infrastructure (DfI) in Northern Ireland wish to ensure legislative alignment on this important safety matter and plan to consult on this separately, in due course.

Question on Implementation:

Q4 Do you think we have explained our proposals clearly, including how they might affect you? If not, what other information would you find useful?

Exemptions

We propose to include two types of exemptions in any legislation:

a) Existing exemptions for tyre roadworthiness

We intend that the existing exemptions listed in the current version of Regulation 27(4)(a) of the Construction and Use Regulations will apply to the requirement for tyre age, to remain consistent with current roadworthiness legislation:

(4) (a) Nothing in paragraph (1)(a) to (g) applies to—

- (i) an agricultural motor vehicle, not being a category T tractor, that is not driven at more than 20 mph;
- (ii) an agricultural trailer;
- (iii) an agricultural trailed appliance;
- (iv) a broken-down vehicle or a vehicle proceeding to a place where it is to be broken up, being drawn, in either case, by a motor vehicle at a speed not exceeding 20 mph; or
- (v) a category T tractor that is not driven at more than 40 km/h.

b) Exemptions for vehicles of historical interest

We consider that it is appropriate to provide an exemption to those vehicles in scope which meet the criteria for vehicles of historic interest, as defined at: <https://www.gov.uk/government/publications/historic-classic-vehicles-mot-exemption-criteria/historic-classic-vehicles-mot-exemption-criteria>, providing they are not used for commercial use. We believe that vehicles of historic interest (over 40 years old) which are in scope of this consultation, and which are also in commercial use, should be subject to the same requirements as ordinary vehicles under 40 years of age. We want to make this important additional requirement for vehicles of historic interest to ensure all vehicles that are used to carry paying passengers or goods are required to have tyres less than 10 years old, as for all other commercial vehicles.

We do not propose to include any further exemptions.

Question on Exemptions:

Q5 Do you agree with the proposed exemptions for: a) tyre roadworthiness? b) vehicles of historical interest? Please explain your response.

Date of Implementation

We propose an implementation period of 3 months from the date of any legislation taking effect before any ban comes into force to allow drivers, operators and businesses time to review their fleet, stock and change any tyres if required. Given that the rationale for this legislation is improving road safety we want to ensure that compliance with the requirement is achieved as quickly as possible. Our assessment is based on existing evidence that the proportion of affected vehicles will be low, that we are building on existing roadworthiness guidance and that tyres are a consumable item that can be readily changed within a short timeframe.

Question on Date of Implementation:

Q6 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.

Enforcement

Vehicle owners, operators and drivers are responsible for ensuring they only operate or drive safe vehicles that comply with the prevailing legal frameworks. We will raise awareness of the planned changes among the professional vehicle operating sector, the maintenance and tyre management community and the third sector.

We propose to enforce any changes to legislation for HGVs, heavy trailers, buses, coaches and minibuses via the Operator licensing regime, roadside checks and roadworthiness tests (annual test or MOT test, as appropriate). The police service would also continue to enforce the rules in the usual way.

Current penalties for non-compliance with existing tyre regulations are subject to Magistrate Court prosecution for the most serious cases (multiple/repeat offences), and through the Fixed Penalty Notice scheme. For Court prosecution the sanctions that can be imposed on owners, operators and drivers are fines, driving licence penalty points or, in severe cases, disqualification from driving. The maximum fine is Level 5 for offences for goods vehicles, minibuses or buses. This means in England and Wales the fines are unlimited, whereas in Scotland and Northern Ireland the fine is a maximum £5000. Cases of non-compliance involving drivers or operators subject to Operator licensing will also be reported to the Traffic Commissioners for possible disciplinary action.

We propose to apply the full range of this enforcement regime and associated penalties for our proposed changes for tyre age, the visibility of tyre age markings and for driving/operating a vehicle where these markings have been tampered with.

Question on Enforcement:

Q7 Do you agree with our proposed approach to enforcement? If not, do you have any suggestions on how we could improve our approach to enforcement?

Impact Assessment

We have produced an impact assessment of the costs and benefits of our proposals which is published alongside this consultation. The impact assessment also includes a series of detailed analytical questions which will be explored through this consultation and further research.

Question on Impact Assessment:

Q8 What views do you have on the analysis of the costs and benefits outlined in the consultation stage impact assessment?

Environmental Impacts

We recognise the environmental challenges associated with tyre disposal and by permitting the use of re-treaded tyres on certain configurations in our proposal, we aim to support the re-use of tyre carcasses where possible and safe to do so, providing the re-treaded tyre meets international standards. We would welcome views on the potential environmental impact of any legislation that prevents the use of tyres 10 years and older on certain vehicles, balanced against the potential road safety benefits of our proposal.

Question on Environmental Impacts:

Q9 What are your views on the potential environmental impacts of our proposals?

Taxis and Private Hire Vehicles

We are also seeking views on extending these proposals to include taxis and Private Hire Vehicles (PHVs) to help inform any future policy decisions to improve the safety of these vehicles and the fare paying travelling public. Our expectation is that all vehicles that are used to transport passengers for a fee should be governed by legislation on tyre age.

We want to collect views and data to understand if there are any additional requirements to consider if extending a tyre age ban to taxis and PHVs. If we do decide to implement such a ban, we will share the details of any plans in a subsequent consultation.

Taxis and PHVs are required to meet existing roadworthiness standards, either via MOT or Local Authority testing (which must at least meet MOT requirements). These include checks on tyres for defects and wear, tougher checks may apply to older vehicles. We acknowledge that we do not currently have specific evidence of the age profile of these vehicles or what the impact of such a ban would be on these vehicle operators and drivers, or on the wider economy, the environment and society. We would welcome any observations, evidence and data to improve our understanding in this area.

Questions on Taxis and Private Hire Vehicles:

Q10 Do you think this ban on the use of tyres 10 years or older should be extended to taxis and Private Hire Vehicles?

Q11 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.

Q12 What else do you think we should be aware of in relation to an age-related ban for tyres for taxis and PHVs?

What will happen next

A summary of responses, including the next steps, will be published within three months of the consultation closing on www.gov.uk/dft#consultations
Paper copies will be available on request.

Annex A: List of Consultation Questions

The consultation questions, a response form and details of how to respond are available at www.gov.uk

The questions are also listed below for reference:

Q1 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.

Q2 Do you agree with our proposal, subject to the outcome of the consultation, to prohibit the use of re-treaded 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.

Q3 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.

Q4 Do you think we have explained our proposals clearly, including how they might affect you? If not, what other information would you find useful?

Q5 Do you agree with the proposed exemptions for:

- a) tyre roadworthiness?
- b) vehicles of historical interest?

Please explain your response.

Q6 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.

Q7 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?

Q8 What views do you have on the analysis of the costs and benefits outlined in the consultation stage impact assessment?

Q9 What are your views on the potential environmental impact of our proposals?

Q10 Do you think this ban on the use of tyres 10 years or older should be extended to taxis and Private Hire Vehicles?

Q11 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.

Q12 What else do you think we should be aware of in relation to an age-related ban for tyres for taxis and PHVs?

Q13 Do you have any other observations or comments about aged tyres?

Annex B: Consultation principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments about the consultation process please contact:

Consultation Co-ordinator
Department for Transport
Zone 1/29 Great Minster House
London SW1P 4DR
Email consultation@dft.gov.uk