

Brussels, 25 September 2026

Subject: Keep Euro 7 tyre abrasion and brake limits for heavy-duty vehicles on schedule to reduce microplastic emissions and protect public health and the environment

Dear Honourable Representative of the Irish Presidency of the Council of the EU,

We are writing to express our concern regarding recent proposals in the European Parliament and the Council, in the context of the Automotive Omnibus, to postpone the implementation of the Euro 7 framework for heavy-duty vehicles, brake dust and tyre abrasion. Some proposals call for a 2- to 5-year moratorium on the entire heavy-duty Euro 7 framework, while others seek to carve out and delay tyre wear and brake particle emissions specifically.

Such a delay would weaken one of the EU's most important laws to protect public health and address a major source of microplastic pollution and particulate air pollution, create regulatory uncertainty for manufacturers investing in cleaner technologies, send the wrong signal to innovators and undermine the credibility of the EU's pioneering environmental framework and its global leadership in this field.

Heavy duty vehicles represent a major source of both air pollution and microplastics. Tyre wear particles are the second largest source of microplastic pollution in Europe, with an estimated 360,000–540,000 tonnes released every year. They contaminate water, soils and the marine environment while also contributing to air pollution and associated health impacts. Tackling these emissions is therefore essential in light of the EU's objective of reducing microplastic releases by 30% by 2030 under the Zero Pollution Action Plan.

The Euro 7 Regulation, adopted in 2024, is the world's first comprehensive legal framework for regulating brake particles and tyre abrasion emissions. Its implementation relies in part on corresponding UN technical regulations developed under the United Nations Economic Commission for Europe (UNECE). With the adoption of the first UN Regulation on tyre abrasion limits for passenger car tyres (C1) in June 2026, the EU is now on track to become the first jurisdiction worldwide to introduce binding tyre abrasion limits. The adoption of abrasion standards for C1 will then be followed by similar standards adopted first for C2 and then C3 tyres.

Proposals to pre-emptively postpone the timeline for the adoption of C3 tyre abrasion standard would be a step back on the original legislative framework. The Euro 7 legislative timeline already anticipates that test methods and limits would be finalized progressively for each tyre category, accounting for technical complexity. It was deliberately designed to accommodate technical developments at UNECE by offering a phased implementation timeline, with C3 tyres already benefiting from the longest implementation period for any kind of tyre category.

The substantial governance work already completed for C1 abrasion on test methods, equivalence provisions and performance limits are expected to facilitate, not hinder the development of standards for C2 and C3 tyres. Reopening the agreed timeline pre-emptively would undermine regulatory certainty and disrupt the Euro 7 framework as well as undermining European manufacturers and suppliers who have invested in developing lower-emission technologies and products. Certain manufacturers have already indicated that the current timeline remains achievable, demonstrating that technical complexity is a challenge to be managed, not a

¹ Heavy-duty vehicles" in this context covers category N2 and N3; M2 and M3; and O3/O4.

reason to postpone implementation. Regulatory certainty is essential to encourage continued investment, reward innovation and maintain Europe's global leadership in lower emitting technologies, like tyre technology.

UNECE estimates that these first limits for C1 tyres alone could reduce overall tyre abrasion by more than 10% and replace around 30% of the highest-abrasion tyres currently sold in Europe and Japan. The health and environmental benefits of Euro 7 will ultimately depend on how quickly high-abrasion tyres leave the market, how effectively the rules are enforced and how progressively the limits are strengthened over time. Achieving these objectives requires adhering to the implementation timeline adopted by EU legislators across all pollutant categories. Although passenger cars account for the largest share of total emissions, heavy-duty vehicles such as buses and trucks generate substantially more microplastic pollution per kilometre. Delaying the requirements for heavy-duty vehicles would interrupt a regulatory pathway that is already underway and would lock in significant health and environmental risks.

For these reasons, we respectfully urge you to oppose any proposal to postpone or weaken the implementation of the Euro 7 heavy duty requirements - and to preserve the Regulation's current timetable.

Yours sincerely,

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