

Date

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Case officer

Omar Bagdadi

Road and Rail

Road Technology

Vehicle Rules

Impact assessment of new provisions on winter tyres for A-tractors

The Swedish Transport Agency's proposals:

That the Swedish Transport Agency shall adopt new provisions – on the requirements for winter tyres on A-tractors and trailers towed by them – in the Swedish Road Administration's Regulations (VVFS 2003:19) on cars converted to tractors and cars converted to class II motorized equipment.

A. General

1. What is the problem or the reason for the regulation?

On May 11th, the government notified to the EU Commission a draft amendment to Chapter 4, Section 18a of the Road Traffic Ordinance (1998:1276) concerning requirements for the use of winter tyres on tractors made from converted cars, also known as A-tractors¹. According to the government, the intention is for the amendment to be adopted before winter 2023.

The amendment to the Ordinance introduces a requirement for A-tractors to be using winter tyres when travelling by road during the period from 1 December to 31 March. The Swedish Road Administration's Regulations (VVFS 2003:19) on cars converted to tractors and cars converted to class II motorized equipment do not currently have any provisions on winter tyres, which means that summer tyres can still legally be used during the period from 1 December to 31 March.

2. What is to be achieved?

The draft regulation clarifies the requirements on winter tyres that are to be used in accordance with the forthcoming requirement in Chapter 4, Section 18a of the Road Traffic Ordinance.

The proposal means that the same rules on which tyres are considered winter tyres – that currently apply to cars and trailers towed by cars – would also apply to A-tractors and trailers towed by them.

¹ Cars converted to tractors according to the Swedish Road Administration's Regulations and general guidance (VVFS 2003:19) on cars converted to tractors and cars converted to class II motorized equipment

3. What are the alternative solutions?

3.1 Impact if nothing is done?

If nothing is done, there will be an absence of rules specifying which types of tyres are to be considered winter tyres for A-tractors. Consequently, all types of tyres, including summer tyres, could still be used during the period from 1 December to 31 March, despite the requirements for winter tyres on A-tractors as introduced in Chapter 4, Section 18a of the Road Traffic Ordinance. This would mean that the rule laid down in the Regulation cannot be applied.

3.2 Alternatives that do not involve regulation

There are no alternatives that do not involve regulation. Without the proposed tyre provisions in our regulations, the Road Traffic Ordinance requirement for winter tyres on A-tractors Regulation will be rendered ineffective.

3.3 Regulatory alternatives

We propose new provisions for winter tyres on A-tractors and trailers towed by them.

Alternative 1 (the Swedish Transport Agency's proposal)

This proposal means that the requirements for winter tyres on passenger cars, lorries, and trailers towed by them – as specified in the Swedish Transport Agency's Regulations and general guidance (TSFS 2009:19) on the use of tyres, etc. intended for cars and trailers towed by cars – will be introduced into the Swedish Road Administration's Regulations (VVFS 2003:19) on cars converted to tractors and cars converted to class II motorized equipment.

Alternative 2

An alternative to introducing rules on winter tyres in the Swedish Road Administration's Regulations (VVFS 2003:19) on cars converted to tractors and cars converted to class II motorized equipment would be to extend the scope of the Swedish Transport Agency's regulations and general guidelines (TSFS 2009:19) on the use of tyres, etc. intended for cars and trailers towed by cars, to also apply to A-tractors, with consequential amendments to VVFS 2003:19 in order to avoid regulatory duplication.

4. Who is affected?

It primarily affects owners and drivers of A-tractors. To a limited extent, it also affects police and inspection bodies in relation to roadworthiness tests and roadside inspections. Tyre manufacturers are also affected to the extent that there may be increased market demand for tyres.

5. What are the impacts of the regulation?

This impact assessment only covers the amendments proposed by the Swedish Transport Agency. The effects and impacts of the introduction of requirements for the use of winter tyres on A-tractors in the Road Traffic Ordinance are not addressed here, rather in connection with the amendment to the Ordinance itself.

5.1 Enterprises

(X) The regulation is not deemed to significantly impact the working conditions, competitiveness or other conditions of enterprises. All consequences for enterprises are therefore described under 5.1.

() The regulation is deemed to significantly impact the working conditions, competitiveness or other conditions of enterprises. Therefore, the impact assessment does not contain a description under 5.1, but all the consequences for enterprises are described in section C.

The proposal means that the provisions on winter tyres – that currently apply to all cars and trailers towed by cars – will also apply to A-tractors and trailers towed by them. The draft regulation is not expected to have any significant impact on enterprises.

5.2 Citizens

The proposal means that the provisions on winter tyres – that currently apply to all cars and trailers towed by cars – will also apply to A-tractors and trailers towed by them. For owners of A-tractors, the proposal means that a set of winter tyres needs to be purchased, if not already done.

The cost of a set of winter tyres varies depending on the tyre size that fits the vehicle. The estimated cost for four new winter tyres is approximately SEK 3,000 to 4,000. Since an A-tractor is a converted car, winter tyres for cars also fit such vehicles. Thus, there is an extensive market for used winter tyres, which reduces the cost. However, there may be an additional cost of SEK 3,000 to 4,000 for four new rims. The rims are considered to be a non-recurring cost.

The winter tyres are expected to last longer than they do on passenger cars since A-tractors are generally not used as extensively as passenger cars. The Swedish Transport Agency estimates that new winter tyres may need to be purchased every 6–8 years.

5.3 The State, regional authorities or municipalities

The Swedish Police Authority will be affected by the regulatory amendment, however, they are well-versed in the current rules and regulations for winter tyres on cars. Since the proposal is for the same rules to also apply to A-tractors, the Swedish Transport Agency deems the regulatory amendment to not have any significant impact on these entities.

In general, the Swedish Transport Agency does not expect any significant impact on the State, regional authorities or municipalities.

5.4 Environment

Environmental impacts are expected to be marginal; partly because some A-tractors already have winter tyres, and partly because the speed and mileage of A-tractors is much lower than that of passenger cars. It is therefore deemed that tyre wear and road wear that give rise to particulate matter will be limited in extent.

5.5 Externalities

The main effect of the proposal is to increase road safety during winter months.

6. **What is the impact of the regulatory alternatives considered and why are the regulations considered to be the best alternative?**

By introducing rules for winter tyres – in the Swedish Road Administration's Regulations (VVFS 2003:19) on cars converted to tractors and cars converted to class II motorized equipment – all of the rules for A-tractors are collected into a single regulatory framework instead of being dividing up into several. The Swedish Transport Agency believes that doing so makes things easier for all parties, particularly for the drivers.

7. **On what authorisation is the Agency's right to make decisions based?**

The proposed amendment is notified by virtue of Chapter 8, Section 16 of the Vehicle Ordinance (2009:211) and Chapter 4, Section 18a of the Road Traffic Ordinance (1996:1278).

8. **Is the regulation consistent with or does it exceed the obligations arising from EU law or other international rules?**

The proposed regulation does not conflict with EU law or other international rules as technical requirements for winter tyres on A-tractors are not

harmonised within the EU. Nor is it contrary to the provisions of the UNECE Regulations or other international regulations.

A notification of technical rules will probably be needed in accordance with the Order (1994:2029) on technical regulations.

9. Does special consideration need to be given regarding the date of entry into force, and is there a need for special information initiatives?

The amendment to the regulations should enter into force at the same time as the proposed amendment to the Road Traffic Ordinance. The Swedish Transport Agency proposes that the regulations should enter into force no later than 1 December 2023.

B. Transport policy effectiveness

The overall goal of Swedish transport policy is to ensure a socio-economically efficient and long-term sustainable transport supply for citizens and businesses throughout the country. Under the overall goal, there are performance objectives and health, environment and safety (HES) objectives with a number of prioritised areas.

The performance objective is to create accessibility for people and goods. The design, functioning and use of the transport system shall help provide everyone with basic accessibility, with good quality and usability, as well as contribute to the development dynamic across the whole country. At the same time, the transport system must uphold the value of equality, meaning it must meet the transport needs of both men and women in equal measure.

The HES objective concerns health, environment and safety. The design, functioning and use of the transport system shall be adapted so that no one is killed or seriously injured. It shall also contribute to the overall generational goal for the environment and achieving the environmental quality goals, as well as contribute to increased health.

10. How does the regulation affect the performance objective?

The proposal is not considered to affect the performance objective.

11. How does the regulation affect the HES objective?

The proposal is expected to increase road safety when winter conditions prevail.

C. Enterprises

The regulation is not deemed to significantly impact the working conditions, competitiveness or other conditions of enterprises. See Section 5.1.

D. Summary of impacts

Affected party	Impacts that cannot be quantified		Quantified impact (SEK thousands)	Comments
	Advantages	Disadvantages		
Enterprises	-	-	-	-
Citizens	Safer vehicles in winter. Clearer rules regarding tyres on A-tractors	Initial cost of purchasing winter tyres	SEK 6,000 – 8,000	The market for used winter tyres reduces the costs.
The State etc.	Clearer rules regarding tyres on A-tractors			
Externalities	Increased road safety			
Total				

E. Consultation

There are no specific consultation requirements. As work on the amendments progresses, the Swedish Police Authority will be kept up-to-date on changes being made and will receive related documentation in connection with circulation for external comments.

If you have any questions regarding this impact assessment, or any opinions you would like to share, please contact us:

Omar Bagdadi, specialist
 Email: omar.bagdadi@transportstyrelsen.se
 Phone: 010-495 56 02

Hans Norén, specialist,
Email: hans.noren@transportstyrelsen.se
Phone: 010-495 57 73

Kerstin Grandelius, Team Leader
Email: kerstin.grandelius@transportstyrelsen.se
Phone: 010-495 55 90