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**Pirelli Tire Comments on California's Proposed Replacement
Tire Efficiency Program**

Additional submitted attachment is included below.



June 15, 2026

California Energy Commission
Docket Unit
Docket No. 26-TIRE-01
715 P Street
Sacramento, CA 95814

Re: Comments on the California Energy Commission's Proposed Tire Efficiency Regulation

Pirelli Tire LLC, which sells tires in California both manufactured in the United States and imported, appreciates the opportunity to comment on the California Energy Commission (CEC) proposed regulation to increase the efficiency of passenger car and light-truck replacement tires pursuant to Assembly Bill 844 (Nation, Chapter 645, Statutes of 2003).

Pirelli Tire LLC is part of the Pirelli Group, which leads the entire automotive industry in the S&P Global's 2025 Corporate Sustainability Assessment and is well on its way to decarbonizing its operations, and its tires, while making them more energy efficient.

Pirelli Group managers' incentive plans are linked to the volume of "eco-safety" tires placed on the market. We define "Eco-safety tires" as tires achieving an A or B rating in BOTH the rolling resistance and wet braking (safety) categories of the European label. We run our tires through this evaluation, regardless of whether they are sold in Europe and actually labelled this way. Our goal is for 50% of all the tire volume we sell worldwide to achieve this "eco-safety" status by 2030.

Pirelli is known for high-performance, high-end, safe tires, whether on the highest class of international motorsports or on a country outing in a wide range of high-end passenger vehicles and light trucks. We constantly raise our own bar on being able to offer high-performance, energy-efficient tires with low rolling resistance while also designing them to react to braking, especially on wet surfaces, with safety in mind. As you know, these two concepts are contradictory; a bald tire slides along the road with more energy efficiency but does not have the grip to brake quickly. So the "secret sauce" in high-end tire manufacturing is to maximize both qualities at the same time.

As a European-headquartered Group, we have seen firsthand the benefits of a consumer information program designed to not only provide more transparency to consumers on tire energy efficiency and safety, but also to move the entire industry forward, incentivizing innovation to meet a higher bar sooner.

We therefore agree with the CEC on the opportunity to provide such regulation, and have been strongly in favor of a national consumer information program to be adopted in the US as well.



We believe, however, that the CEC proposal is too drastic and would not achieve the positive results that were generated in Europe. Indeed, it could have unintended consequences unfavorable to consumers. It would likely cut out of the market a significant percentage of the tires available today, especially outside of the high end of the vehicle market, rather than nudging all tire manufacturers to improve rolling resistance of all tires on a realistic timeline. In addition, because of a lack of well-established wet grip testing methods for light truck tires, there is a risk of promoting dangerous tires that perform well in rolling resistance without adequate safety.

In Europe, similar objectives were pursued through a gradual, phased approach—both in regulation and labeling—implemented over many years, allowing industry and consumers to adapt while preserving safety and market balance. The European cutoffs are currently less aggressive than those in CEC’s proposal, precisely because they have kept a “balance of performances approach” that pushes manufacturers to make progress while considering consumer safety and accessibility to affordable tires. The CEC may benefit from considering a similarly progressive timeline to ensure effective, sustainable outcomes. In particular, the timing of Phase 2 should be reconsidered given that tire makers will struggle to achieve the targets since they are so much more aggressive than the European ones. Furthermore, the European approach has become a global reference, with ECE-R117 applied across over 50 countries and EU-style labeling replicated in several major markets, including Japan, Korea, and Brazil. Greater alignment would help ensure success of the California program.

More analysis is needed, before entering Phase 1, regarding effects on California consumers including tire availability and safety. For example, new tires on the market meeting the standards might not match the correct fitments for older vehicles. And given that few of the tires available today in California would pass the high standards of Phase 2, there should be a process to evaluate the effects of Phase 1, costs and benefits to consumers and the environment, and industry readiness for a further tightening of standards.

We look forward to actively engaging with CEC to achieve shared goals.

Sincerely,

Maureen S. Kline

Maureen Kline
Vice President, Public Affairs & Sustainability
Pirelli Tire LLC