

## OUR 2024 BRIEFING DAY – NOTE THE DATE

Following our most successful ever Briefing Day in 2023 we will be returning to the same venue this year so make a diary date now, we will have a lot of new ground to cover:

**WHEN:** Tuesday 24th September 2024

**WHERE:** The Woodland Grange Hotel  
Leamington Spa



## THE 2024 ETRA CONFERENCE

The dates for this year's conference have been announced. The 2024 event will be held in Brussels as usual between **17th and 19th April 2024** so if you plan to be there then block-off these dates now.

More details can be found on the ETRA website: <https://etra.acm.org>

**The 29<sup>th</sup>  
European  
Conference  
on tyre recycling**



**Circular transition in  
Tyre Recycling**

Wednesday to Friday 17 – 19 April 2024  
LE LOUISE Hotel Brussels  
Place Louise, Brussels

## SPENIC-RECYCLING LAUNCHES NEW TYRE-BAY MANAGEMENT APPLICATIONS



'Spenic Tyre Bay' is to offer new specialised software solutions aimed at bulk tyre management with features like value optimisation, easy identification through bespoke tyre labelling as well as inventory organisation. Already working closely with the Vehicle Recycling Association (VCA) this new software product will not only cover on-site tyre inventories but also manage onward flows of end-of-life tyres which is where we in the TRA come in. Working with Spenic-Recycling we will link our members' collection and Responsible Recycler reprocessing services to easily identify local TRA partners.

## NEW AFFILIATE MEMBER

**RE-TYRE**

TRA welcomes 'Re-Tyre Limited' as an Affiliate Member

The Tyre Recovery Association (TRA) represents the UK's tyre recovery sector, which processes over 40 million used tyres every year. A key role is to represent and promote good practice within the tyre recovery sector and to provide an externally audited, legally compliant tyre collection and recovery service which provides protection and peace of mind for all those who generate waste tyres across the UK.

## THE TYRE RECOVERY ASSOCIATION



# Newsletter

[www.tyrerecovery.org.uk](http://www.tyrerecovery.org.uk)

Spring 2024

## A MESSAGE FROM BILL CLARKE, DME TYRES AND TRA PRESIDENT



Once again we find ourselves at the start of another year and yet again we wait for our legislators to deal with the pressing issue of T8 Exemptions and all the problems they attract. T8 Exemptions allow businesses to operate with far fewer controls than fully permitted sites do with much lower costs. How can this be justified given the level of site malpractice we so often read about?

In a recent question to the Environment Agency asking whether it had the same powers to inspect exempt sites as permitted ones it replied: "We do, but as the nature of the exemption means it is low risk, we carry out inspections on a risk basis....."!

I wonder if the Agency would like to tell us just how many instances of regulatory abuse are linked to exempt as opposed to fully-permitted sites? The answer must surely contradict the policy.

Amazingly, and despite all the obstacles thrown in the way of responsible operators like our own TRA members I am heartened to see just how many of us still hang in there as we endlessly wait for Westminster to pass the legislation to end Exemptions in their present form and so create a genuine level playing field. We face very uncertain times and unless that long-promised help with levelling-up is soon forthcoming responsible tyre recycling in Britain will collapse with a permanent loss of infrastructure and then total dependence on export. So much for our nations' "carbon-neutral" ambitions.

It should not be so, here in the UK we have large spare and fully licensed permitted capacity going unused and government action to protect it is needed now.

## INDIA'S TYRE MANUFACTURERS SUPPORT OUR CALL FOR BETTER EXPORT REGULATION

The TRA has welcomed the call by India's Automotive Tyre Manufacturers Association (ATMA) for the country's Ministry of the Environment, Forest and Climate Change to face up to the clear environmental abuses surrounding the way some end-of-life tyres are dealt with in the country. He went on...

*"ATMA has exposed the low standards of environmental practices which appear in some parts of the domestic industry. The evidence from them is clear, too many operators in the Indian onward market are not meeting the recognised environmental standards of their equivalence. It is time the UK government woke up and acknowledged that far from tackling this environmental assault they are enabling UK operators to facilitate environmental harm."*

*"It is time UK government does the right thing and help India stop these environmental abuses, as India's manufacturers demand of us."*

**Exactly what we in the TRA have been saying for far too long now.**

# MAJOR CHANGES ANNOUNCED TO THE WAY WE MONITOR AND REGULATE WASTE

Recent consultations on digital waste tracking and the registration of all those who generate and carry waste point way to future.

## WASTE TRACKING

Recent publication of the government’s response to DEFRA’s earlier consultation on digitalised waste tracking are far-reaching and when implemented will affect all those who handle waste – including tyres – across the entire UK.

The intention is to abolish the existing system of waste transfer and consignment notes with mandatory digital waste tracking. If and when implemented the effect on all of us who handle waste, and waste tyres in particular, will involve a whole new way of working as well as the manner in which we interface with our customers who will also have to adapt to new ways of working.

### Just a few key points:

- The intended “fate” of waste flows will have to be recorded, i.e. re-use, recycle, recovery, etc.
- Government is developing a web-based approach which after a transition period will be “real-time”.
- These regulations, once introduced, will be mandatory possibly from as early as April 2025.

### So what are we doing:

- Fellow tyre industry associations in conjunction with the TRA have already started to work together to address these challenges and to jointly engage with government to ensure that they, together with our regulators, understand all of our concerns as well as the specific challenges of an “itemised” waste stream like “end-of-life” tyres generating in excess of 45m pieces annually across our entire United Kingdom.

## BUT THERE IS MORE...

The Environment Agency which regulates waste handling across England will act to tighten key regulations governing both people and businesses involved in transporting and managing waste. Other devolved administration may follow suit.

What is proposed will be closely linked to Defra’s plans for waste tracking digitalisation. Critically, new concepts of such as “waste controllers”, “waste transporters” both with legal responsibilities will be introduced. “Brokers” or those who handle waste remotely are also to be included.



There will be significant changes to existing permitting regulations with three new permit types replacing existing forms of registration and probably subject to a 3-yearly renewal process.

Another key element will be an emphasis on “operator competence”, the demonstration of which will become mandatory.

Exporters of waste will also have a responsibility to demonstrate that they have full understanding and control over the “fate” of waste shipments for which they handle.

These are big challenges for all of us in the tyre industry so in the coming weeks and months the TRA will be working closely with fellow industry associations to fully understand and prepare for all these impending changes.

## TRA MEMBERS SHARE NEW VRA E-LEARNING PLATFORM

The Vehicle Recycling Association recently devised what is probably the best introduction to tyres ever produced for novices. Covering basic tyre knowledge, this should prove invaluable to our own members and to others inducting new employees to our industry and raise standards generally. Contents include:

- Know your tyres.
- Guidance on Part-Worn tyres.
- Tyre aging.
- Tyres and the Law.
- Tyres and the MOT.
- Tyre construction.
- Repairing tyres.
- Responsible recycling.

Contact the TRA office for more information.



## NOW THE EU MOVE TO STRENGTHEN WASTE SHIPMENT REGULATIONS

Revised regulations to strengthen waste export regulations, including tyres were passed by the European Parliament on 27th February 2024. A prime objective of the new rules will be to reduce reliance on third countries and faster greater domestic recycling. These amended EU rules impose much tougher standards on shipment.

- Waste must be managed in a manner that safeguards human health and the environment throughout the process.
- Waste will only be deemed to be soundly managed if it can be shown that the destination country’s standards of human health and environmental protection are similar to those of the EU.

Specifically, these new regulations will prohibit the export of non-hazardous waste such as end-of-life tyres from the EU to non-OECD such as India unless it can be established by their governments that environmentally sound legal and environmental strategies are in place to qualify for inclusion in the EU’s authorised list of receiving countries.