



Reforming Responsible Waste Management

The Tyre Recovery Association Manifesto for 2024

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Supporting Tyre Recycling in the United Kingdom

A manifesto call for environmental reform of UK's waste tyre policies and an better approach to managing used tyres.

Summary

UK tyre recycling is essential to achieving a circular economy and sustainable economic growth. Responsible tyre recyclers enable the recovery of key manufacturing materials in which Britain is resource poor and otherwise would be virgin material. Tyre retreaders play a vital role in prolonging the life of tyres, extending usage time and thereby curtailing waste. Materials that can be extracted from used tyres include metals, carbon black and silica, reinforced fibres, textile reinforcements and chemical agents.

As we see society move towards a post-fossil fuel driven economy through energy and product innovation, such as Electric cars, the requirements and need to recycle key constituent materials derived from tyres becomes more imperative. Electric vehicles are heavier and we have in fact seen tyre sizes and weights increase on road vehicles. There is no evidence of an alternative or substitute for the rubber tyre on the vehicles on which we rely to drive our lives.

Recycled tyre materials (RTMs) can be used in a broad array of competitive materials, products and applications developed by a range of industries, from housing, leisure and sports to industrial and civil engineering purposes, such as the use of rubberised asphalt for road maintenance.

There are significant environmental benefits in terms of resource efficiency, energy and emissions' saving from RTMs. Each ton of tyres materially recycled saves the equivalent of +/- 20.5 barrels of petroleum when compared with processing virgin materials. Each kilo of tyres recycled into products and materials such as hoses, flooring or roofing products, road surfaces, etc. avoids the emission of 2.7 kilos of CO₂ which represent a net Co₂ saving of 270%, or about four times more than the saving generated via energy recovery in steel mills or cement kilns¹. At the minimum, effective tyre recycling is instrumental in the beneficial recovery of key materials which avoids the use of virgin resources that can be preserved or used elsewhere. Regulations must ensure they do not unintentionally encourage uncontrolled dumping of end-of-life tyres (ELTs).

¹ https://ec.europa.eu/environment/pdf/waste/study/final_report.pdf

Call for Action

Despite the clear benefits and significant opportunities for the UK to reduce its carbon footprint, addressing environmental damage and grow its circular economy, the UK needs much stronger policy support to empower the responsible operators, strengthen the domestic capability and cut the level of export.

British tyre recyclers deserve much more effective policy and regulatory support from the UK government and environmental authorities to:

1. Increase the use of recycled tyre materials and application through the implementation of revised Green Public Procurement incentives focussed on key industries including transport, automotive, mobility, construction, civil engineering, material development (including compounding) and manufacturing.
2. Introduce a new regulatory framework that removes incentives for irresponsible tyre exporters and rewards the responsible businesses.
3. Significantly reduce the export of end-of-life tyres (ELTs) and bring an end to environmental colonialism through the active management and processing of Annex VIIIs and all pertinent export documentation.
4. Boost recycling rates by improving the accuracy of annual data on arisings, and the inclusion of uncounted tyres i.e., agricultural and other off the road tyres (OTRs), which could expand the availability of tyres appropriate for material recycling.
5. Improve and expand coordination with foreign national authorities to limit and address the abuses now being well recorded in the use UK exports. Work with importing nations' administrative agencies and local tyre trade bodies.

This call is to focus the next government on the prominent and straightforward actions needed to boost tyre recycling in the UK and build a circular economy that reduces the UK's global environmental footprint.

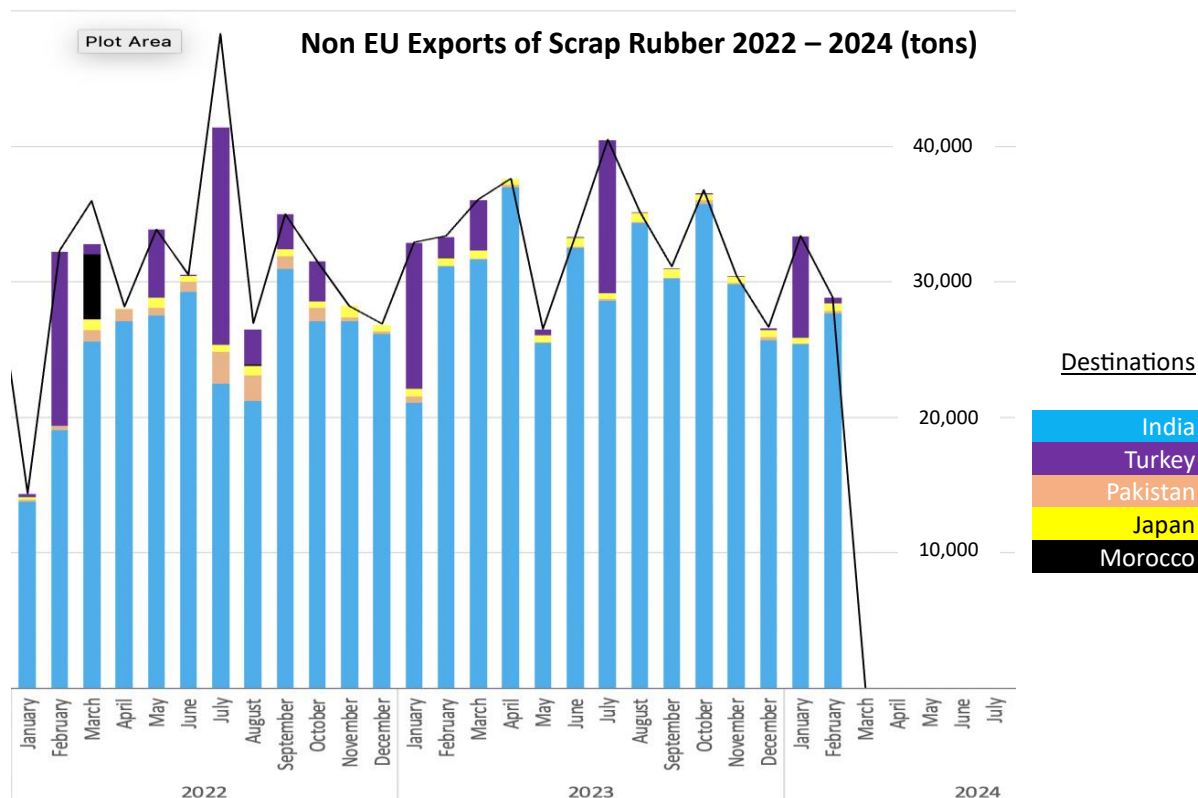
Boosting Tyre recycling (supply side)

Post-consumer tyres are valuable resources which are 100% recyclable. The UK however currently exports an estimated 50% of its ELTs mostly baled.

The ongoing T8 exemption regime is controversial because it provides a loophole for the irresponsible to exploit, encouraging baled ELTs to be exported (in the most part) to the Indian sub-continent. Here the tyres are too often disposed of through illegal and highly polluting activities, including back-street pyrolysis or worn tyres, unfit for use, illegally and unsafely fitted to vehicles.

Currently the UK has at least 150,000 tonnes of licenced idle domestic recycling capacity of its own, but the business case for maintaining this is being undermined by political lethargy. If the government acted, we could be at the front of the environmental pack - building the

circular economy we all want to see. But if the government does not act, we will see a decline in standards. The malady of inertia is settling in and leading us down a path to being the environmental sick man of Europe.



Sound and predictable regulatory frameworks promoting fair competition within end-of-life markets

The UK’s tyre recycling market remains largely driven by SMEs who have developed efficient collection and patented innovative process to use RTMs in multiple products and applications. Many of these products are new and would not previously have been associated with the traditional rubber industry.

To improve the use of recycled tyres and further develop the use of ELTs in new products, a sound and predictable regulatory framework is vital. The TRA calls for a sound interface between waste and chemicals, in particular, in the field of tyre recycling. The TRA also calls for producer responsibility schemes which do not distort but promote competition and are designed in full knowledge and awareness of the current international evidence.

Rubberised Asphalt

Increase use of rubberised asphalt in road construction. This established solution, long adopted elsewhere, incorporates recycled tyre powder or crumb into asphalt, creating more durable and sustainable roads better suited to variants in weather conditions. Rubberised asphalt significantly reduces the volume of ELTs to be exported, while reducing wear to on the road, thereby providing additional life to the on-vehicle tyre. Rubberised asphalt not only

improves road quality but also embodies the principles of a circular economy, turning waste into valuable resources. By embracing such technologies, the UK can enhance its infrastructure, create green jobs, and lead by example in sustainable practices

Update and enforce the regulations

T8 Exemptions

Following the example of Scotland, way back in 2017 Her Majesty's Government committed to ending the hapless T8 exemptions regime in England and Wales. Six years on and T8 exemptions continue here. Irresponsible operators abuse the T8, undermining those who invest in the advanced technology that drives the UK closer to the government's stated ambition of a circular economy.

Waste Shipment regulations

Update to UK's Waste Shipment Regulation, the current alignment between the EU and UK waste regulations is about to change. February's update to EU's Waste Shipment Regulation, with end-of-life waste tyres one of the items specifically referenced, marks the beginning of significant divergence.

At the end of 2023 India's Automotive Tyre Manufacturers' Association (ATMA) released a report which stated that India imported approximately 800,000 tonnes of end-of-life tyres between April and November 2023. The UK and EU member nations being the primary contributors. This troubling statistic underscores the anticipated consequences to the UK now the European Union is taking action to update waste regulations, including on end-of-life tyres among other waste materials. With UK waste management policies noticeably out of sync with those of the EU, it is now just a matter of time before the UK becomes the 'environmental sick man of Europe'.

Fair competition and improved transparency in end-of-life tyre markets

Extended producer responsibility (EPR) schemes vary widely with different national models which do not currently collect and report on all tyres on the market with any consistency.

The TRA advocates in favour of the minimum requirements of UK regulations being enforced and for the minimum requirement set at our national level to be better harmonised with EPR and other systems in the EU at the very least. Tyre recycling regulations must focus on measures aimed at improving transparency and fair competition to avoid the creation of monopolies and mitigate the impacts of existing ones, since undue market power is particularly detrimental to SMEs and disrupts our markets. The TRA also strongly supports non-discriminatory access to ELTs and fair distribution of revenues for recyclers so promoting long-term investment.

Sound definition of tyre recycling

The mechanical processing of tyres is a recycling treatment and must continue to be legally defined as such, as long as the output of the process results in the transformation into a marketable product or materials. Preliminary steps in the process which do not result in such transformation could be considered as recycling pre-treatment or interim step in the recycling process. For this reason, the clear definition of end-of-waste criteria for tyres must remain a priority and far as possible be aligned with definitions in other countries.

Pulling demand and end-users for RTMs

Recycled tyres can be used in a wide variety of products and applications. From use in construction or civil engineering applications to RTMs which can be used in multiple ways including replacing virgin materials, moulded products, in combination with other materials, for transport, construction, manufactured products, mobility and leisure to show very wide-ranging current and future potential of recycled tyres.

The industry needs incentives to pull the demand and end-uses for RTMs. With these incentives we can achieve:

- Long-term certainty for operators which is a key pre-requisite to attracting in new investments in tyre recycling development activities for processes, materials, products and applications;
- Reward responsible operators and the tyre recycler's environmental benefits that the market fails to internalise in prices.

The TRA calls on the next British Government and future Environment Secretary to:-

- 1. Properly police the export documentation and in particular the complete process of Annex VIIIs.**
- 2. Incentivise public procurement, in particular local authority procurement protocols, to ensure public tender support the circular economy in general and, in particular, RTMs. Specifically advance the use of rubberised asphalt as a sustainable, economic long solution to Britain's pothole problem.**
- 3. Act on the commitment to end the T8 exemptions and close the loophole irresponsible operators exploit.**
- 4. Follow Australia's successful example and ban most whole tyre exports by changing export rules to 'shred only' to ensure used tyre exporters operate in a rule compliant environment and encourage exporters to deal with responsible, locally regulated importers.**
- 5. Update the UK's waste shipment regulations to bring them into line with the European Union's new rules to ensure the UK does not become a dumping ground and irresponsible practices are not further encouraged.**

Conclusion

United Kingdom has the opportunity to lead the world in truly developing a circular economy, delivering on the rhetoric championed by our political leaders and set a course forward for the world to follow. The TRA wants its members to be allowed to operate in a responsive regulatory framework. One that gives confidence to investment in new technology that won't be undercut by those flexing the rules to their limit. TRA members must not be left under economic pressure to pick up European Union operators' environmental mess. Failure to do the right thing risks relegating the UK to the unfortunate status of the environmental sick man of Europe, a title that no nation should aspire to hold.

The UK tyre recycling industry represented by the TRA looks forward to continuing to work with DEFRA, the Environment Agency and the parliamentary committees scrutinising government progress in order to further contribute to the goal of a Circular Economy, increasing producer responsibilities and reducing the export of CO2 emissions.