



Newsletter

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Summer 2024

REFORMING RESPONSIBLE WASTE MANAGEMENT

Excerpts from The Tyre Recovery Association Manifesto for 2024

A Message to the new Government and to our Regulators

Supporting Tyre Recycling in the United Kingdom

A manifesto call for environmental reform of UK's waste tyre policies and a 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.

The TRA calls on our new Government and Environment Secretary to:

1. Properly police the export documentation and in particular the complete process of Annex VII.
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.

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.

To read our Manifesto in full go to: <https://tyrerecovery.org.uk/2024/06/17/reforming-responsible-waste-management-the-tyre-recovery-association-manifesto-for-2024/>

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 2024 TRA BRIEFING DAY

This year's TRA Briefing Day will be on Tuesday 24th September again at the Woodland Grange Hotel, Leamington Spa, CV32 6RN.

With a conference programme packed with essential insights:

- The latest data analysis of used tyre arisings in the UK, Europe and beyond.
- Introduction of Digital Waste Tracking from 2025.
- Tracking Technologies.
- Requirements for the registration of all Dealers/Brokers/Carriers of waste. Who it will affect/what retailers, carriers and reprocessors will need to do.
- The Export question.
- The VRA's new tyre training module.
- Tyre manufacturers, retreaders and TRA recyclers – working together.

Participation is free for TRA members, media representatives and our industry regulators. A charge of £60.00 plus VAT per person will apply to all other participants. A buffet lunch and refreshments are included.

For more information or to pre-register please contact the TRA offices at:

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STOP PRESS...

THE NEW EU RULES PROVOKE CONCERN FROM INDUSTRY – EA TO ASSESS

Disquiet expressed by TRA and fellow waste streams at meetings with the Environment Agency have led to the setting up of a joint EA/Industry Working Group to assess the UK risk level. Concerns were wide spread including the:

- Possibility of a “backdoor waste corridor” via the UK
- Exploitation of loopholes leading to increased fraud
- EU/UK regulatory “imbalance”



NOW GERMANY’S TYRE RECYCLERS CALL FOR ACTION ON EXPORTS

As reported by Tyre and Rubber Recycling magazine Germany’s tyre recyclers are not only expressing mounting concern over levels of waste tyre exports but demanding that the EU do even more to control these as well as actively promote recycling within the internal market. Unlike our own country’s authorities the EU seems to be in listening mode as new regulations aimed at exercising waste exports came into force on 11th April this year but AZuR, the Germany-led Alliance for the future of Tyres is demanding more. They are calling on others across Europe in advocating what they term “economically and ecologically superior” tyre recycling.

“One of the downsides of mobility is the around 3.5 million tons of old tyres that are generated in **Europe** every year. The equivalent of 560 more old tyres are added every minute. So, we are dealing with a huge market in which valuable raw materials are consumed. The goal of AZuR is to keep these raw materials in the recycling loop for as long as possible. For this to succeed, urgent action is required: companies and organisations must take responsibility.”

The TRA agrees.

EU TIGHTEN THE RULES ON WASTE SHIPMENTS

Intended to tighten regulations surrounding the exporting of waste materials including end-of-life tyres as well as ensuring good practice at destination, new rules were announced on 15th April this year. These new rules will progressively require non-compliant states who currently take in waste to demonstrate standards of equivalence and good practice matching EU norms.

Sadly, there are as yet no signs that the UK will move in lock-step to ensure that we do not become an even more attractive source of ELTs for dubious disposal practices overseas. By leaving the UK exposed in this way inaction by our regulators will only further undermine our domestic recovery infrastructure. This is a real and present danger which the TRA will be urging our new government to confront. Follow this link to learn more: <https://tyrerecovery.org.uk/2024/04/09/uk-set-to-be-environmental-sick-man-of-europe-if-british-politicians-dont-act/>

IS CIRCULARITY BUCKLING?

According to media reports the annual “Circularity Gap Report” actually recorded a downward trend last year. Why? The less than illuminating conclusion was a complex mix of geopolitical, economic, environmental and social factors. Regulatory “drivers” including targeted enforcement went unmentioned as did that other missing essential, shared responsibility, once a central plank of our government’s early enthusiasm for Producer Responsibility almost three decades ago.

Most of us would agree that the “sharing” has been just a bit one-sided. As a very recent leader in the Financial Times newspaper rightly concluded, government should be an enabler, not a controller. Only when that imbalance of effort is properly addressed may we then develop the stable and investment-friendly market conditions we all hope for.



DEFRA GET TOUGH

In a recent policy response, the Secretary of State for the Environment, Food and Rural Affairs (Defra) has re-iterated his intention to move Britain to a zero waste economy, support sustainable growth and reduce emissions and waste. That ambition also extends to ELT exports.

Newly-appointed Minister, Steve Reed, went on to confirm on a response to a FOI request by Tyre and Rubber Recycling magazine that:

The export of tyres to India for pyrolysis is illegal. Businesses involved in the export of waste are required to take all necessary steps to ensure that the waste they export is managed in an environmentally sound manner. Individuals and businesses found to be exporting waste in contravention of the requirements of the legislation can face a two-year jail term and an unlimited fine.



DARREN LINDSEY ON A LEARNING CURVE

Recently appointed as new Chief Executive of the British Tyre Manufacturers Association (BTMA), Darren, who has succeeded Graham Wilson who recently retired, has lost no time in familiarising himself on recycling issues.



Already, Darren has called on TRA members Conica and Black-Ram in what will be an ongoing “tour d’horizon” of UK tyre recycling.

Left photo: Darren Lindsey (second from left) at CONICA and (left) at Black-Ram.