



Immediate Release

Date: 15 August 2025

Tyre Recovery Association publishes ‘Road to Reform’ following Environment Agency’s review

Policy paper sets out five steps for enforcing responsible export of waste tyres

Friday 15 August – The Tyre Recovery Association (TRA) has today released a five-step action plan, titled ‘*Road to Reform*’ to provide a clear and systematic approach to remedying the shortcomings identified in the Environment Agency’s (EA) recent review of waste tyre exports. The TRA welcomed the report’s release last month, as a significant milestone and is committed to working with the government to deliver on these reforms and stop the illegal diversion of British waste tyres to damaging pyrolysis plants in countries like India.

Peter Taylor OBE, Secretary General of the Tyre Recovery Association, said:

“The EA’s report is a clear diagnosis of the sickness in the current regulatory framework and we welcome the recognition of the shortcomings in its ability to meaningfully enforce regulations. Our ‘*Road to Reform*’ paper provides a constructive and practical five-step action plan, using technology to strengthen existing powers and ensure the UK’s responsibility for waste tyres does not stop at our national borders.

“We need to see the EA respond to their review and the action promised by the Waste Minister, in spring, to ensure we both bring an end to irresponsible waste exports and sustain our own tyre reprocessing capabilities.

“The EA has the tools and the policy lead to make a real difference now. The technology exists and our industry stands ready to assist the British government in rolling out these measures to ensure compliance.”



The TRA's road to reform plan clearly sets out five steps for enforcing responsible export of waste tyres. It calls for 'Enhanced Verification' by leveraging contemporary technology to transform the Annex VII process. The five steps cover:-

- **Update Annex VII technology, introduce mandatory geotagged evidence:** Use contemporary technology to enhance the Annex VII verification process.
- **Digital Chain of Custody:** Implement some simple checks as a pre-cursor to Digital Waste Tracking, with a verifiable chain of custody for all waste tyre shipments.
- **Cross-Referencing, Compliance and Blacklisting:** Using their powers under Article 50 of UK Waste Shipments regulations the EA must outline the penalties for any party found to have submitted incomplete or fraudulent paperwork.
- **Federated Data and Transparency:** A simple central digital portal will provide the EA and its international partners with federated, live data feeds. This will improve transparency and allow regulators to monitor the movement of waste tyre shipments more effectively and at a lower cost.
- **Enforce Site-Specific Rules:** Actively enforce the existing policy that a pyrolysis plant cannot legally accept imported tyres. Enhanced verification is crucial to prove that tyres arrive at licensed and "environmentally sound managed" (ESM) recovery facility, rather than being diverted for illegal pyrolysis.

In parallel to these immediate steps for enhanced verification, the TRA continues to champion the ultimate solution for long-term stability and environmental assurance: the introduction of a "shred only" policy for waste tyre exports. This policy, already adopted by Australia, provides a simple and effective means of addressing environmental concerns and ensuring a sustainable UK domestic processing capability.

ENDS

For further information, please contact Giles Bancroft on 07876503182 or gbancroft@godolphincomms.co.uk.

NOTES TO EDITORS

- The BBC File on 4 documentary, "*The Tyre Scandal*" aired on Wednesday 26 March 2025 and investigated the export of used tyres from the UK for processing abroad.
- The Tyre Recovery Association continues to call on the Government to update two pieces of regulation:



- **Ending T8 exemptions** (announced some years ago, but no action has followed. Scottish authorities ended T8 exemption in 2018)
 - **Ending exports of whole end-of-life car tyres (ELTs)** (as Australia has demonstrated, a simple and effective means of addressing environmental concerns and ensuring domestic capability)”
- About the Tyre Recovery Association (TRA): The Tyre Recovery Association (TRA) is the representative body for the UK tyre recovery industry. Its members account for the majority of used tyres collected and processed in the UK. The TRA promotes the safe, sustainable and environmentally sound recovery and recycling of end-of-life tyres, advocating for responsible industry practices and robust regulatory frameworks.

Road to Reform - Five-Step Action Plan for enforcing responsible export of waste tyres

Recommendations for Enhanced Regulation and Enforcement of Waste Tyre Exports

Following the publication of the Environment Agency’s (EA) recent review of waste tyre exports, the Tyre Recovery Association (TRA) recognises this as a significant milestone on the road to reform. The report’s clear diagnosis of the shortcomings of the current regulatory framework are welcome and as is recognition of the status quo with regard to the EA’s ability to meaningfully enforce regulations. The TRA is committed to working with the Government and her agencies to deliver the “remedy” for this situation.

To this end, the TRA recommends a five-step action plan to drive the reforms that are necessary. The plan provides recommendations for strengthening existing powers and recommends for further enhancements to stop the illegal diversion of British waste tyres to environmentally damaging pyrolysis plants in countries like India. This plan prioritises using technology while pushing for more permanent policy enhancements.

Update Annex VII technology, introduce mandatory geotagged evidence: Use contemporary technology to enhance the Annex VII verification process, meeting the obligations of Article 49 of the UK Waste Shipment Regulations. An online end-to-end registry of UK waste generators, exporting to EMS validated recovery facilities, will give the EA oversight of the whole process. Submission of signed and countersigned Annex VIIs supported by geotagged photographs of the sealed container (container number and seal number) will provide unique and undeniable proof of origin and final recovery for that shipment.

Digital Chain of Custody: The EA has the opportunity to implement some simple checks as a pre-cursor to Digital Waste Tracking, with a verifiable chain of custody for all waste tyre shipments. The system should record where shipments originate (Annex VII Box 6. Waste Generator) and where they are officially meant to go (Annex VII Box 7. Recovery Facility) and can be integrated with third parties such as shipping line APIs for further scrutiny.



Cross-Referencing, Compliance and Blacklisting: Using their powers under Article 50 the EA must outline the penalties for any party found to have submitted incomplete or fraudulent paperwork. By introducing a mechanism to cross-reference the enhanced Annex VII paperwork and its supporting evidence to ensure it matches at both the export and import ends, the next step is to block any offender, who has sought to divert the cargo from its designated route, from further participation in the export of UK waste tyres using fines and prosecutions, with a maximum 5 year custodial sentence under the Environmental Protection Act 1990.

Federated Data and Transparency: A simple central digital portal will provide the EA and its international partners with federated, live data feeds. This will improve transparency and allow regulators to monitor the movement of waste tyre shipments more effectively and at a lower cost.

Enforce Site-Specific Rules: Actively enforce the existing policy that a pyrolysis plant cannot legally accept imported tyres. Enhanced verification is crucial to prove that tyres arrive at licensed and "environmentally sound managed" (ESM) recovery facility, rather than being diverted for illegal pyrolysis, under the Article 49 obligation. This will also save the EA significant inspection resources and reduce reliance on unsubstantiated ESM claims that have been proven (File on 4's *Tyre Scandal* and TRA evidence t