

Tyre industry response to Panorama's questions

1. Is any profit made on the green fee/environmental charge levied by retailers?

Paying for the disposal of tyres is an additional cost for any tyre retail business which has to be taken into account to cover overheads for processing the scrap, many members also suffer from secondary tipping where unscrupulous dealers will dump their scrap on members premises which then becomes their responsibility for disposal.. Some retailers show the charge separately on their invoices and other do not, however, most retailers include the cost of disposal when quoting for supply. Each individual retailer will set the price for disposal at a level which will cover collection and the processing costs such as storage, handling administration etc.

2. Is the charge voluntary?

The charge is not voluntary but it is optional. In accepting to take on the customer's used tyres for disposal the retailer is assuming a Duty of Care to dispose of the tyres legally. This Duty has a cost. Most motorists accept that it is entirely reasonable for them to be charged a nominal amount to dispose of their tyres and our research shows that the vast majority of motorists accept the charge as part of the overall cost of changing their tyres. The consumer is at liberty to take his used tyres with him and not pay the charge but in this case the Duty of Care for legal disposal lies with the customer.

3. What is the advice to motorists who don't want to pay it? Will retailers still take the tyres?

See above. The cost of disposal would be part of the quote for the supply of tyres as is the fitment of the tyres. If the motorist decided not to pay the charge it would be a matter for the motorist and the retailer to resolve.

4. Should a system of producer responsibility be introduced in this country – with producers being made responsible for keeping a track of what happens to the tyres. This I understand was proposed by the government but dropped around 2008 is that right?

Over a decade ago there was a major debate between Government and the Industry about whether or not the tyre manufacturers should take the "producer responsibility" for the disposal of tyres. After detailed consideration of the possible solutions it was agreed that the process which currently exists worked well and should not be changed. This has the full backing of Government and has resulted in the UK having one of the best performances for tyre disposal in Europe.

5. Does the TDA welcome the proposed scrapping of the waste transfer note – did the TDA or other association bodies have an opinion on this when the recent consultation took place leading to the proposals that were published just a week or so ago.

Any move by Government to reduce the burden of unjustified red tape is welcomed. However, the authorities need to be vigilant in monitoring the collection and processing companies to ensure that tyres are disposed of in a responsible manner. At a recent waste tyres workshop organised by the Environment Agency it was agreed that the proposed scrapping of waste transfer notes would be a retrograde step in this respect.

6. What do you make of several estimates given to us by people in the tyre industry that up to around 50% of all used tyres in the UK are sent abroad for export.

Some tyres are exported both as waste derived fuel and for other reuse. However, figures from the Department for Business, which are derived from HMRC trade statistics, show that these exports represent only 4% of total used tyre arisings. The suggestion that somewhere in the region of 50% of all used tyres are being disposed of in this way is unfounded.

7. Is the tyre recycling system currently working in this country?

The UK tyre recycling system covers used tyre arisings from all car, van and truck tyre sales. This is not the case in most other European countries. When compared on this basis the performance of the UK used Tyre recovery Industry is held in high regard throughout Europe. Figures from the Department for Business show that 96% of all used tyre arisings are the subject of legal recovery or recycling operations. The relatively low level of illegal disposal is a testimony to the solutions which the industry has put in place to address what would otherwise be a major environmental problem.