



Paul Hallett
Department of Trade and Industry
Sustainable Development Directorate
Bay 426
151 Buckingham Palace Road
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Dear Mr Hallett,

**SUBJECT: DISCUSSION PAPER ON A POSSIBLE PRODUCER
RESPONSIBILITY FOR USED TYRES**

Thank you for the opportunity to comment on these new ideas. The comments below come on behalf of the Local Authority Recycling Advisory Committee (LARAC) for whom I am Policy Officer. LARAC is an association representing 300+ local authorities who co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary Authorities.

As local authorities hold both the statutory position for the management of household waste and more importantly are viewed by the general public as 'managers of all waste', LARAC feels that it is important to express our initial views on the proposals for producer responsibility on used tyres.

Having had first hand experience of the effect of the producer responsibility obligations for packaging waste, LARAC would like to suggest some basic principles that are applied to the regulation of used tyres. These include:

- That the resources embedded within used tyres are utilised and maintained for all long as practicable. This could obviously include retreading, reuse, crumbing, recycling and energy from waste. However, LARAC would like the Government to ensure that any legislative scheme is sufficiently robust to ensure that reuse schemes are not used illegitimately to bypass producer responsibility obligations perhaps resulting in fly-tipping with increased cost burdens to local government.
- That any scheme is simple, transparent and easy to use for all relevant parts of industry and the general to understand. LARAC's experience of the producer obligations for packaging waste is that these overly complex

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regulations have been the source of confusion and an excuse for inaction within the industry.

- That any scheme should apply at the simplest and easiest place to administer within the tyre production lifecycle. Again experience of the packaging waste obligations suggests that keeping the number of companies obligation to a minimum makes for an easier scheme to administer. With respect to used tyres this would appear to imply placing the obligation upon vehicle and tyre manufacturers and importers.
- That any scheme must dovetail with other legislative proposals and statutes both at a national and European level. Principally these are the UK Abandoned Vehicles regulations and from the European level the emerging End of Life Vehicle regulations.
- That any proposed recovery targets should for the first few years of operation exceed 100% to ensure that existing stockpiles of used tyres are recovered and appropriately treated.
- That whatever the format for any scheme it should have no negative financial effects upon local government, nor distort the commercial market such that fly-tipping increases and/or local government is otherwise burdened with the social, economic and environmental consequences of dealing with used tyres.

LARAC hopes that these comments are helpful and looks forward to seeing the outcome of the consultation in due course and would welcome the opportunity to comment on more specific proposals when they emerge.

Yours Sincerely,

Andy Doran
Surrey County Council
Policy Officer, LARAC