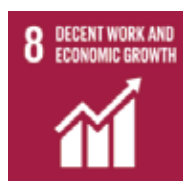


Rehviringlus

NEWSLETTER

SPRING 2025



DEAR CUSTOMERS AND PARTNERS OF MTÜ REHVIRINGLUS!

YOU ARE READING OUR FIFTH NEWSLETTER

- The long-awaited legislative amendments that extend producer responsibility to vehicle importers are about to come into effect.
- Car importers are joining the producer responsibility organisation (PRO).
- An overview of the 2024 statistics: which recovery methods were used this year, and how many waste tyres were collected and sent for recovery.
- Media overview.

With the amendment to the Waste Act, importers of category M1 passenger cars, category N1 vans and category L2e mopeds will become tyre manufacturers

The producer responsibility system for waste tyres has been part of Estonian legislation since 2006. In 2010, the legislation was amended regarding collection requirements, and an obligation to carry out information campaigns was introduced. In 2024, the Riigikogu amended the Waste Act, under which, as of 1 July 2025, importers of passenger cars must also have joined the PRO for waste tyres. From that date onwards, all importers of motor vehicles and their trailers must therefore have joined the producer responsibility organisation (PRO) for tyre producers.

The amendment also broadened the definition of a producer of tyres.

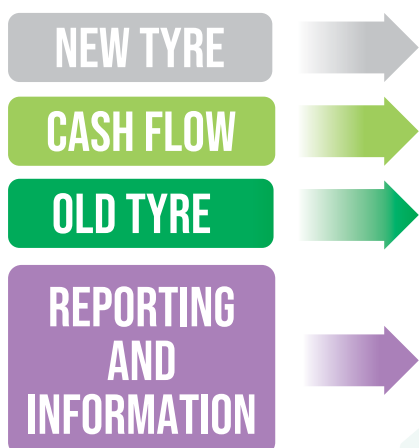
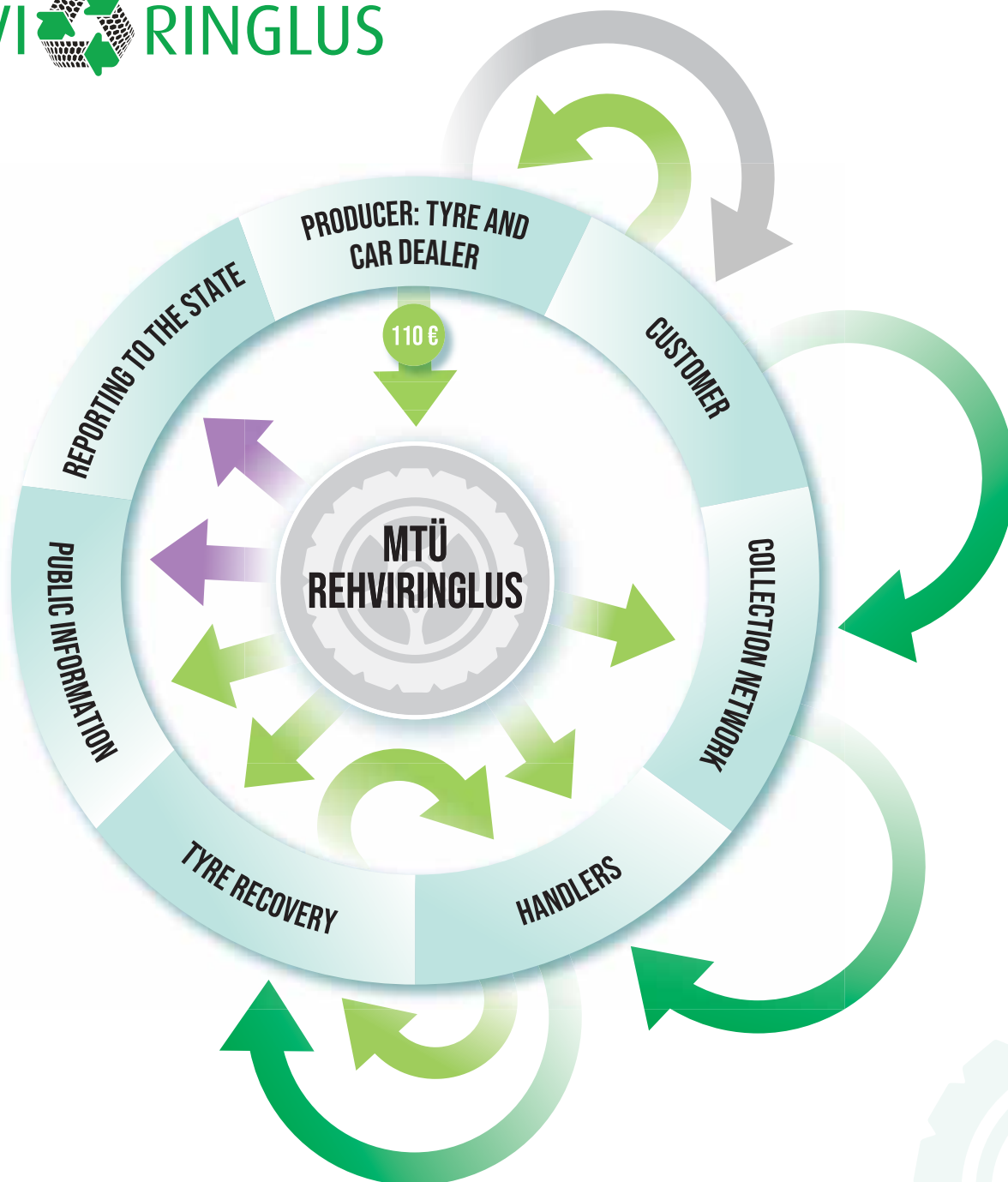
A producer of tyres according to the new version of the Waste Act is:

a natural or legal person having a place of business in Estonia who, in the course of its commercial or professional activity, manufactures, sells or imports, irrespective of the selling technique used, including by means of distance contracts as defined in point (7) of Article 2 of Directive 2011/83/EU of the European Parliament and of the Council, tyres on the Estonian market, including together with a trailer defined in clause 9, with an off-road vehicle defined in clause 36, with a motor vehicle defined in clause 40, with towed equipment defined in clause 58 and with interchangeable towed equipment defined in clause 91 of § 2 of the Traffic Act;

a natural or legal person established in a Member State of the European Union or outside the European Union who, in the course of its commercial or professional activity, sells tyres directly to households or other users in Estonia by means of distance contracts as defined in point (7) of Article 2 of Directive 2011/83/EU of the European Parliament and of the Council, including together with a trailer defined in clause 9, with an off-road vehicle defined in clause 36, with a motor vehicle defined in clause 40, with towed equipment defined in clause 58 and with interchangeable towed equipment defined in clause 91 of § 2 of the Traffic Act.

We encourage all motor vehicle importers to join us at <https://www.rehviringlus.ee/joining> today and sign a membership contract, so that when the law enters into force, the terms and conditions are already negotiated, the principles and obligations of producer responsibility are clear and all other formalities are completed.



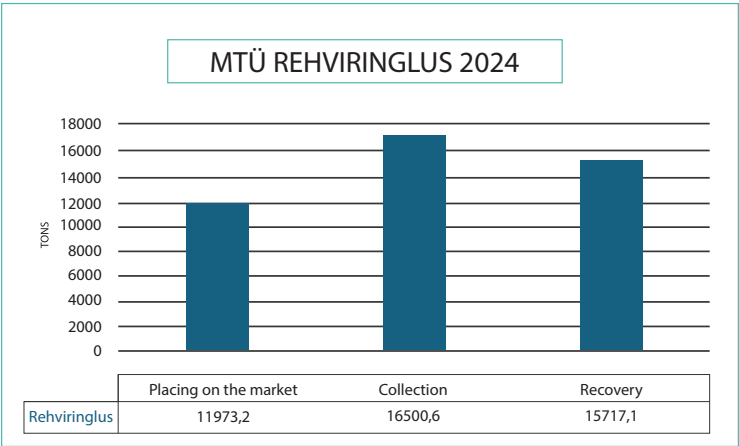


**THE OPERATING PRINCIPLE
OF PRODUCER
RESPONSIBILITY
ORGANISATION**

Car importers are joining the producer responsibility organisation (PRO)

Among importers of vehicles and trailers, Viking Motors AS, Veho Baltics OÜ, Iron Baltic OÜ, NCG Import Baltics OÜ, Jatiina OÜ, and Eurostauto OÜ have recently joined.

Activities of Rehvinginglus in 2024



We collect more than is placed on the market

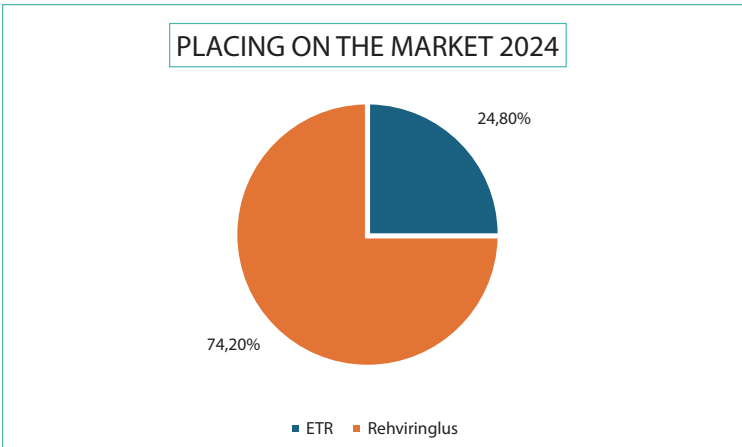
In 2024, the companies that have joined Rehvinginglus placed a total of 11,973 tonnes of tyres on the Estonian market. In 2023, this amount was 13,682 tonnes.

However, we collected significantly more than was placed on the market – 16,500 tonnes of tyres. The large gap between placing products on the market and collection is mainly because MTÜ Estonian Tyre Recycling (ETR) has not collected in proportion to its market share. The additional "overcollection" has come from tires removed from motor vehicles that enter our collection network.

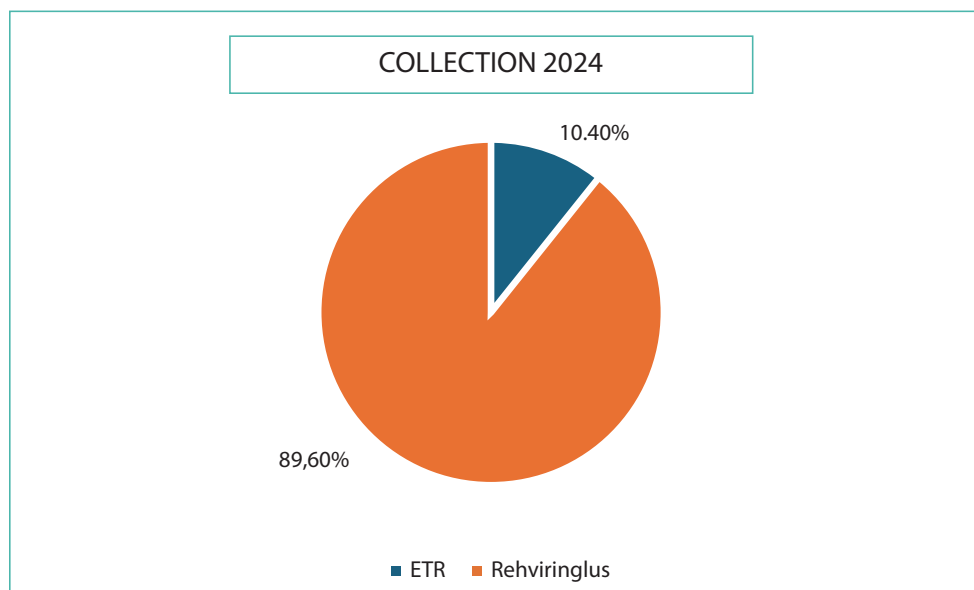
Starting from July 1st, an amendment to the Waste Act will come into force, under which car importers will also become tire importers. Therefore, by the end of this year, we will have a better understanding of whether the gap between placing products on the market and collection will decrease.

Another factor has been the general economic situation, which has significantly reduced tire sales.

Based on the market shares of the two PROs, Rehvinginglus collected 2,650 tonnes more tyres in 2024.



Based on the market distribution between the two PROs, ETR should now "catch up" on its share or compensate Rehvinglus for the costs incurred due to "over-collection." ETR has collected fees from its members for placing products on the market, it has not collected a enough tyres.



Two years after its establishment, ETR has not gained momentum in the recovery of waste tyres, and the companies that have joined ETR have not fulfilled their producer responsibility duties as tyre producers.

The companies that have joined ETR may not realise that their obligations as producers remain unfulfilled, as they have paid for the service. 241 tonnes of recovered waste tyres over two years is negligible compared to the quantities placed on the market and speaks for itself.

The collection of end-of-life tires in a volume significantly smaller than their market share, and the failure to direct these tires for recycling, indicates that the companies affiliated with ETR have not fulfilled the obligations arising from their producer responsibility as tire producers, even though they have paid for the fulfillment of these obligations through delegation.

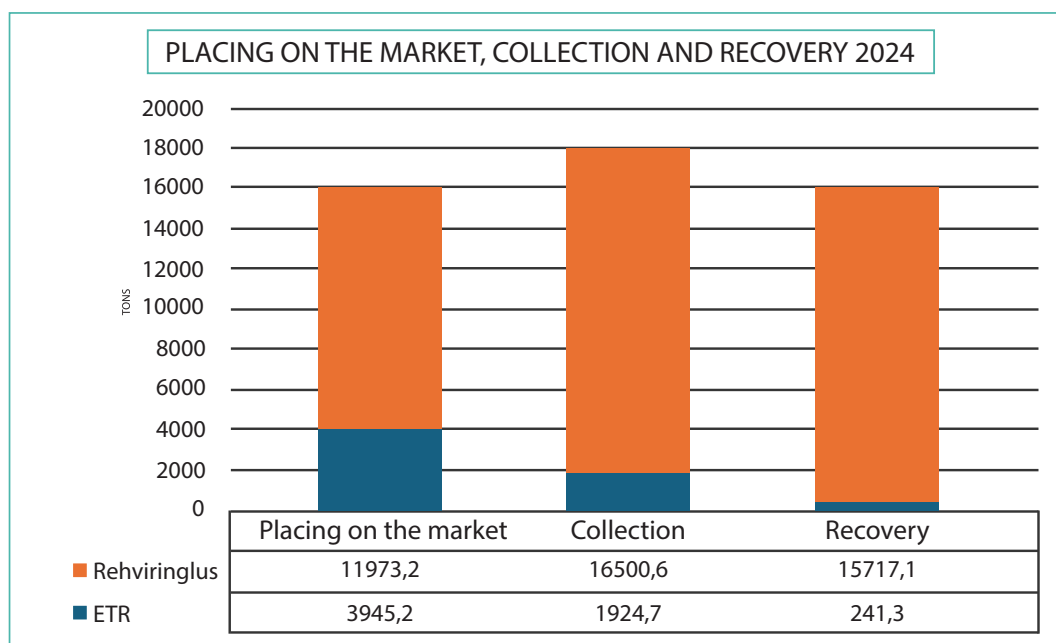
Principle of Extended Producer Responsibility:

The producer is obligated to ensure the management of waste generated from products placed on the market and to bear the associated costs.

The producer or producer association must provide the necessary financial or financial and organizational means to fulfill the obligations, covering the costs incurred from the separate collection, transportation, and treatment of waste generated from the products placed on the market by the producer.

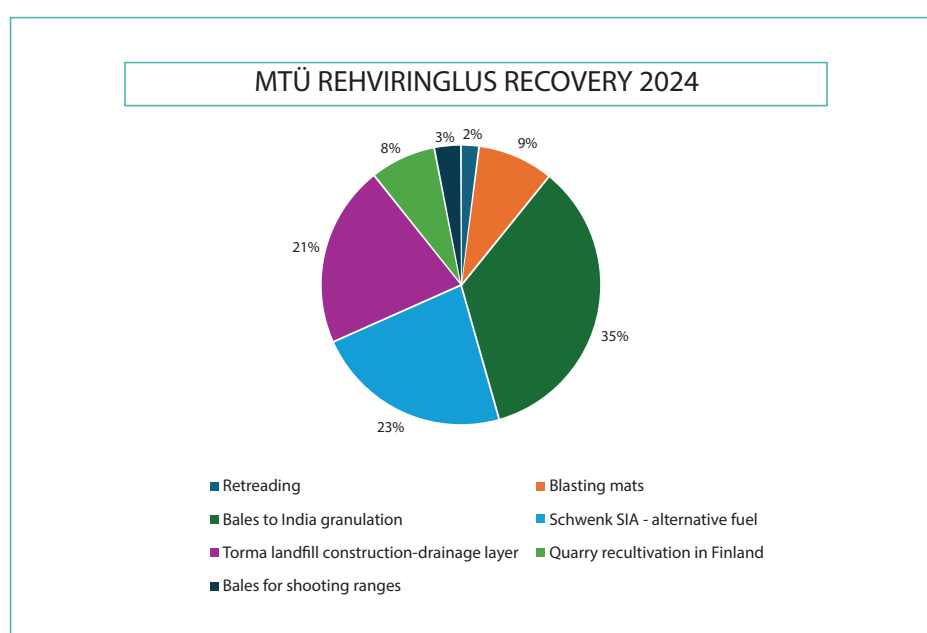
This also includes costs related to providing relevant information to waste holders, registering in the product register, and submitting data to the register.

The producer remains responsible for the products placed on the market until the waste generated from these products has been properly managed.



KEY FIGURES FOR 2024 RELATED TO ACTIVITIES OF THE TWO OPERATING PROS

TVO	JOINED COMPANIES	NUMBER OF HANDLING METHODS	PRICE	NUMBER OF COLLECTION POINTS IN ESTONIA	PLACING ON THE MARKET / T	COLLECTION / T	RECOVERY / T
MTÜ Rehviringlus	198	7	110	110	11973,2	16500,6	15717,1
MTÜ Estonian Tire Recycling	19	1	120	75	3945,2	1924,7	241,3



MTÜ Rehvinglus used seven different recovery options in 2024.

Starting with the best possible recovery method – retreading – we note that there has been a change in the accounting principles. From now on, the recovery data for retreading includes only those quantities of tyres that retreaders have collected as waste tyres from the Estonian market and used to produce new retreaded tyres. Rehvinglus records this same quantity as both placed on the market and collected.

Tyres that are brought directly by the customer to the retreader and returned after retreading are, according to the position of the Environmental Board and the Ministry of Climate, not considered waste management but rather product repair or maintenance (as these tyres do not become waste), and these quantities are not included in the PRO's waste reporting.

Rehvinglus has accepted this position and has collected corrected data from retreaders, based on which it has made the corresponding adjustments to the data submitted to the register of products of concern for 2023 and 2024. Thus, retreaded tyres account for 2% of the recovery achieved by the MTÜ Rehvinglus.

We sent 35% of the collected waste tyres, packed into tyre bales, to India, where they were shredded and recycled as material. 23% of the tyres were used as an alternative fuel in the cement industry, replacing fossil fuels. Landfills are facilities that have to be established with various environmental requirements in mind. One such requirement is the need for a drainage layer to enable the controlled management of leachate. Thus, 21% of the recovered tyres were used for the construction of a drainage layer at the Torma landfill in Jõgeva County. As some special service tyres are very bulky and difficult to handle, we sent 8% of the tyres to Finland for quarry backfilling. Special service tyres are a good substitute for large volumes of soil that would otherwise need to be extracted. 9% of the tyres were used to produce construction mats, which are primarily used in blasting operations in Scandinavia. 3% were used in shooting ranges as tyre bales for the construction of safety berms.

Media coverage

The previous newsletter was sent to readers on 21 November. Below are some of the key media reports published since then.

January 6 January on Delfi:

<https://epl.delfi.ee/artikkel/120348002/rehvingluse-juht-mootorsoidukimaks-pole-ainus-mis-tanavu-autoaris-muutub>

An article by Einar Teesalu, board member of MTÜ Rehvinglus, about how, starting from 1 July 2025, importers of passenger cars will be required to join the extended producer responsibility system.

February 1 February on Postimees Majandus:

<https://majandus.postimees.ee/8183710/luubi-all-eesti-energia-juhtide-bluff-olitoostus-hakkab-plasti-ja-vanu-rehve-tootlema>

An article by Postimees journalist Andrus Karnau about how the production of oil from tyre chips at Enefit Power remains highly uncertain. As a result, the producer responsibility organisation Estonian Tire Recycling currently has no recovery options.

6 February on the ERR portal:

<https://www.err.ee/1609596884/enefit-poweri-skepsis-vanarehvide-suhtes-tekitab-ragn-sellsile-kahtu>

An article by ERR journalist Jüri Nikolajev about how Enefit Power's decision not to use tyre chips has put Ragn-Sells in a difficult position.

17 February on the ERR portal:

<https://www.err.ee/1609607408/enefit-power-ja-ragn-sells-jatkavad-vaidlust-vanarehvide-kasutamises-olutootmises>

A follow-up article by an ERR journalist about how the dispute between Enefit Power and Ragn-Sells continues.

**IF YOU ARE INTERESTED IN LEARNING MORE ABOUT OUR RECOVERY ORGANISATION,
YOU CAN FIND MORE INFORMATION AT THE LINKS BELOW.**

https://www.rehviringlus.ee/_en

<https://www.rehviringlus.ee/joining>

<https://www.rehviringlus.ee/tariffs>

<https://www.rehviringlus.ee/joined-companies>



*Einar Teesalu, board member of MTÜ Rehviringlus
Photo: Tiit Mõtus*

**If you have any questions or proposals on how to improve the work of Rehviringlus,
please get in touch with Einar Teesalu +372 512 5833, info@rehviringlus.ee
Share your good ideas and observations with us!**