

Rehviringlus

NEWSLETTER

AUTUMN 2025



DEAR MTÜ REHVIRINGLUS CLIENT AND COOPERATION PARTNER,
You are reading our latest newsletter, which provides an overview of our activities and related developments.

The topics of our sixth newsletter are

- An overview of the statistics for the first half of 2025: what recovery methods were used this year, and how many used tyres were collected and sent for recovery in total.
- The European Commission's position on producer responsibility regarding tyre blocks.
- An overview of how the producer responsibility system for used tyres operates in the Republic of Latvia.
- A QR code that helps retailers get an overview of Rehvinglus collection points where tyres can be handed over free of charge.
- Media overview.

WHY DO WE PUBLISH THIS NEWSLETTER?

We believe it is not enough to simply send our clients certificates confirming recovery.

Rehviringlus aims to provide a broader overview of the current situation in the field of producer responsibility for used tyres, the bottlenecks in the system, and, as much as possible, the “bigger picture” available to us. We know what we are doing ourselves, but we do not necessarily have an overview of what others are doing.

Estonia's other producer responsibility organisation for used tyres is not making much effort in this regard, and the statements on the Estonian Tyre Recycling (ETR) website about their environmentally friendly and transparent tyre management are misleading.

Indeed, they are looking for opportunities for tyre recovery, but there is still a long way to go in meeting their obligations corresponding to their market share. As the CEO of Rehviringlus, I work daily to ensure that fairness is achieved — for the clients of both Rehviringlus and ETR.

In this newsletter, you will also find an overview of how four producer responsibility organisations operate in Latvia, although a specific aspect of Latvia is that they deal with several types of problem waste producer responsibility schemes. Latvia has concluded that auditing PROs makes sense. Even though we dream of less bureaucracy and reduced administrative burden, there is a need for more thorough control.

The money paid by importers must be used purposefully.

In July, an amendment to the Waste Act entered into force, according to which motor vehicle importers are also considered tyre producers.

We recommend that motor vehicle importers who have not yet joined do so today at

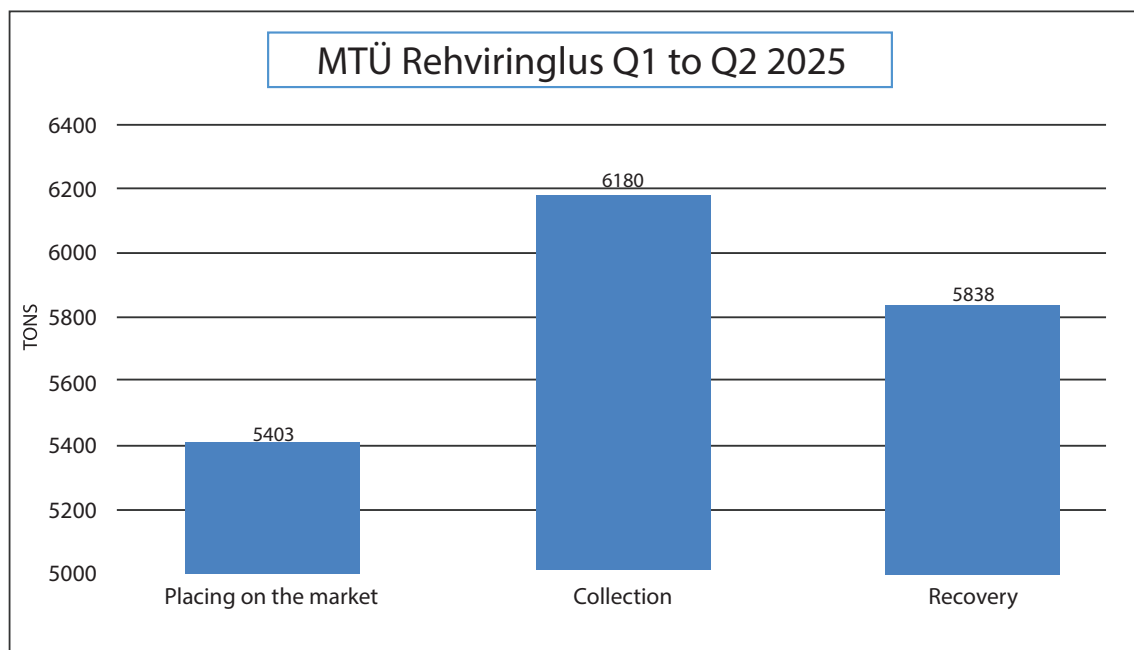
<https://www.rehviringlus.ee/joining> and sign a membership agreement to fulfil the producer responsibility obligations set out in the law.

Most of the autumn tyre-changing season is behind us. Our task is to send all collected used tyres for recovery. And that is exactly what we are doing.



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

ACTIVITIES OF REHVIRINGLUS IN THE FIRST HALF OF 2025



WE COLLECT MORE THAN IS PLACED ON THE MARKET

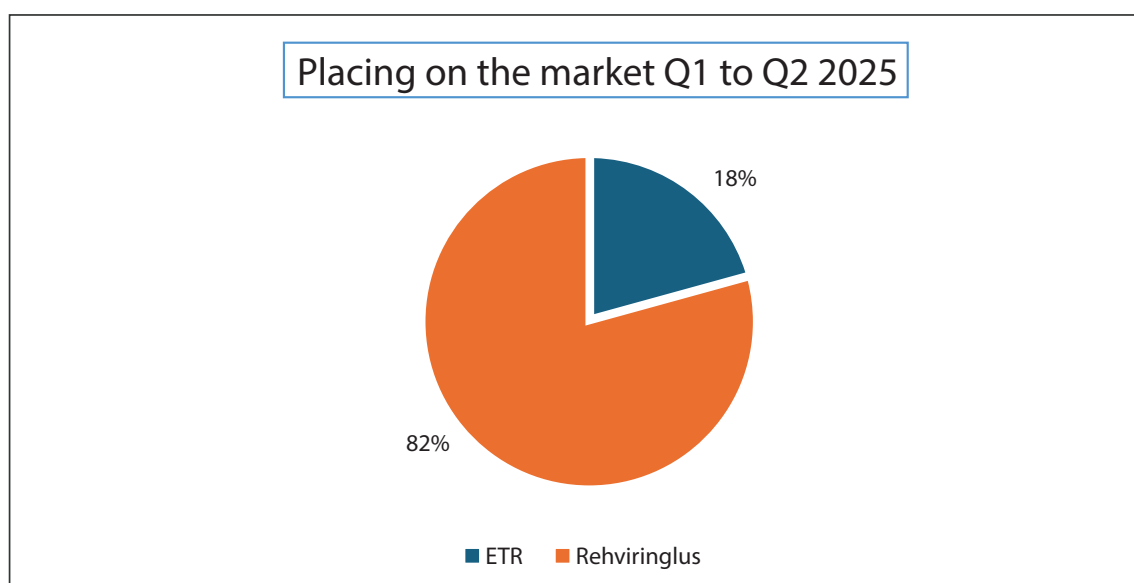
In the first half of 2025, the companies affiliated with Rehviringlus placed 5,403 tonnes of tyres on the Estonian market.

However, we collected significantly more than was placed on the market — 6,180 tonnes of tyres.

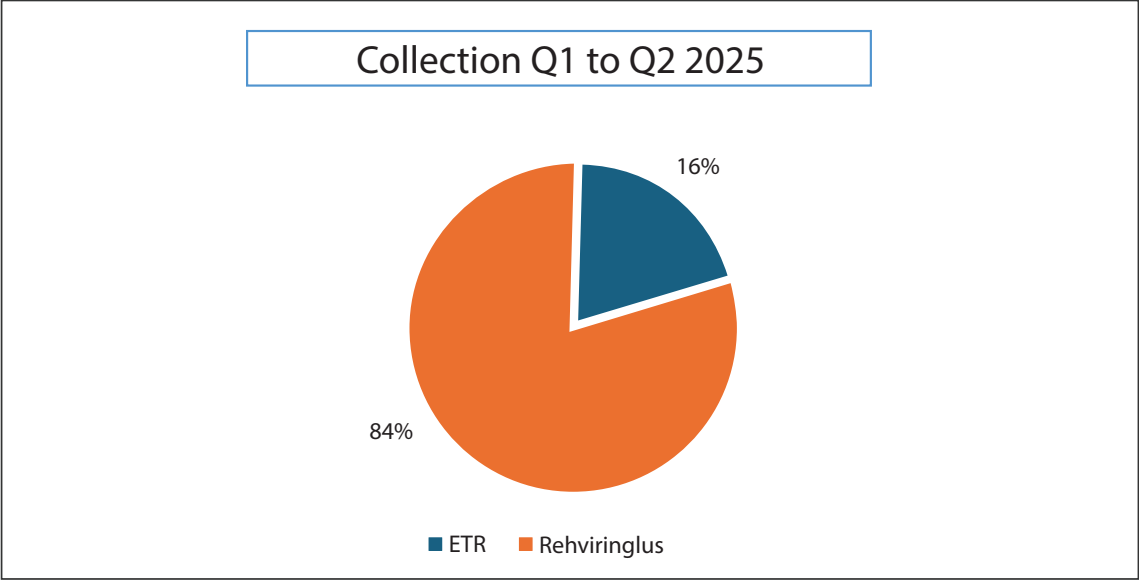
This large difference between market placement and collection is mainly due to the general economic situation, which has led to a significant decrease in tyre sales.

Tyres are still being brought to collection points in higher quantities. Rehviringlus has 111 collection points, which is 35 more than ETR. In reality, they collect tyres from only about one-third of their collection points. This is one of the reasons behind ETR's under-collection.

The remaining so-called "over-collection" comes from tyres removed from motor vehicles that end up in our collection network. As of 1 July, an amendment to the Waste Act entered into force, according to which car importers are also considered tyre producers. Therefore, by the end of this year, we will understand whether the difference between market placement and collection will decrease.



Based on the market distribution between the two PROs, the current collection situation between ETR and Rehvinglus has “settled” somewhat better. However, the issue of offsetting the previous over-collection from 2024 remains unresolved, when Rehvinglus collected 2,570 tonnes more tyres than its market share at the time allowed.



THREE YEARS AFTER ITS ESTABLISHMENT, ETR HAS STILL NOT MANAGED TO GAIN REAL MOMENTUM IN USED TYRE RECOVERY

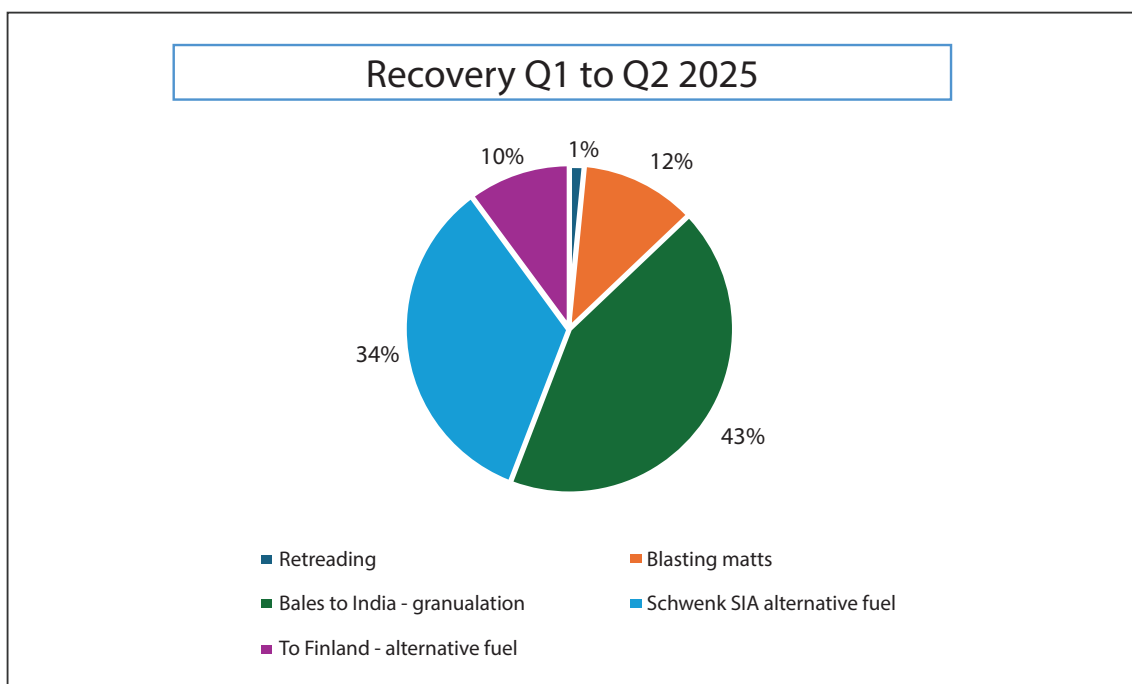
Companies affiliated with ETR may not realise that their duties as producers are only partially fulfilled, as they have paid for the service. Taking into account 2024 and the first half of 2025 together, as well as market shares, ETR has approximately 3,000 tonnes of tyres that have not been recovered. Collecting and recovering a significantly smaller quantity of used tyres than their market share requires shows that companies joined with ETR have not fulfilled the producer responsibility obligations associated with being a tyre producer, even though they have paid for the fulfilment of these obligations through delegation.

- The responsibilities of a tyre producer are
- Maintaining the collection network for used tyres;
 - Collecting used tyres;
 - Sending collected used tyres for recovery;
 - Carrying out awareness campaigns targeted at tyre users;
 - Submitting data and communicating with authorities.

KEY INDICATORS RELATED TO THE ACTIVITIES OF THE TWO OPERATING PROS IN THE FIRST HALF OF 2025

TVO	Joined companies	Number of handling methods	Price	Number of collection points in Estonia	Placing on the market / t	Collection / t	Recovery / t
MTÜ Rehvinglus	242	4	110	111	5403	6180	5838
MTÜ Estonian Tire Recycling	52	1	120	75	1183	1148	?

TYRE RECOVERY METHODS USED BY MTÜ REHVIRINGLUS IN THE FIRST HALF OF 2025



In the first half of 2025, MTÜ Rehviringlus used four different recovery methods.

Starting with the best possible recovery method — retreading — we inform you that a change has been made in the accounting principles. From now on, the retreading recovery data will include only those quantities of tyres that retreaders have collected from the Estonian market as used tyres (waste) and turned into new retreaded tyres. This same quantity is shown by Rehviringlus as both market placement and collection.

Tyres that customers bring directly to the retreader and receive back as restored are not considered waste management according to the position of the Environmental Board and the Ministry of Climate, but rather repair or refurbishment of a product (these tyres do not become waste). Therefore, these quantities are not reported by a PRO in its waste-related reporting.

Rehviringlus has accepted this position, collected corrected data from retreaders, and made corresponding adjustments to the data submitted to the problem product register for 2023 and 2024. As a result, retreaded tyres account for 1% of MTÜ Rehviringlus' recovery.

44% of the collected used tyres were sent to India, packaged as tyre blocks, where they were shredded and recycled as material.

34% of the tyres were used as an alternative fuel to fossil fuels in the cement industry.

In addition to the usual Latvian market, 10% of the tyres were sent to Finland for use as alternative fuel.

12% of the tyres were used to produce blasting matts, which are used in blasting operations in Finland.

EUROPEAN COMMISSION CONFIRMS: PRODUCER RESPONSIBILITY ENDS WHEN TYRE BLOCKS ARE MANUFACTURED FROM USED TYRES

The European Commission's response is clear and unambiguous: the producer responsibility related to the new product becoming waste can lie only with the producer of that new product, not with the producer of the original product that served as its raw material.

Therefore, the claim that producer responsibility for tyres does not end when tyre blocks are manufactured from them is not true.

Rehviringlus uses several methods for recycling used tyres, including handing them over for the production of tyre blocks. In 2024, the Environmental Board approved the production of tyre blocks from used tyres as construction products and recognised these tyre blocks as products. As a result, used tyres cease to be waste during the production of these blocks, in accordance with Article 6(1) of the Waste Framework Directive and §21 of the Waste Act.

According to the guidance prepared by the European Commission on interpreting the Waste Framework Directive, ceasing to be waste also means completing the recycling process. When a substance or material ceases to be waste, it exits the scope of the waste regulatory framework.

Therefore, there should be no question as to whether producer responsibility for used tyres as waste ends with the production of tyre blocks, or whether it merely “pauses” and “resumes” at the moment when the tyre blocks might again become waste at some point in the future. Yet such a question has been raised publicly.

Why?

In 2022, Estonian Tire Recycling MTÜ (ETR) joined the list of producer responsibility organisations for tyres. A smear campaign started in the media centred around the claim that using tyre blocks in construction is “horrificing” and environmentally harmful, seeking to create the impression that using used tyres in tyre blocks does not release tyre importers from producer responsibility.

In the autumn of 2024, a person associated with ETR — their processing partner Ragn-Sells AS (hereinafter RS) — submitted a proposal to the Estonian Parliament during the legislative procedure for the Waste Act Amendment Bill (430 SE), suggesting that the law should be amended so that the production of tyre blocks would no longer terminate producer responsibility.

Although RS's proposal did not receive the support of the Parliament, it was endorsed by the Ministry of Climate, which stated that the law did not need to be amended because “interpretation” was sufficient. The core of this “interpretation” was the position that if the initial properties of waste do not significantly change as a result of recycling (including cases where a new product is created), then despite ceasing to be waste, the producer's obligations nevertheless do not end.

Through a request for clarification, Rehviringlus sought answers from the Ministry as to where this interpretation came from and how it aligns with the concept of “end-of-waste” as an autonomous notion of EU law, which cannot have “local peculiarities.” The Ministry of Climate did not provide substantive answers to these questions.

As a result, Rehviringlus turned to the European Commission, requesting clarification on whether producer responsibility ends definitively when waste ceases to be waste under Article 6(1) of the Waste Framework Directive, or whether it could “pause” and later “resume” when the new product created after ceasing to be waste itself becomes waste.

The European Commission's response is therefore clear and unambiguous: producer responsibility related to the new product becoming waste can lie only with the producer of that new product, not with the producer of the original product used as input material.

The claim that producer responsibility for tyres does not end when tyre blocks are produced from them is not true. The differing positions of the Ministry of Climate and ETR are not based on the law and contradict both EU law and the European Commission's interpretation.

OVERVIEW OF THE LATVIAN PRODUCER RESPONSIBILITY SYSTEM FOR USED TYRES

Although the legal framework for handling used tyres in Latvia and Estonia is similar, the practical operational framework differs in several ways.

Market Volume and Benefits of Membership

In 2024, a total of 17,700 tonnes of tyres were placed on the Latvian market, a quantity comparable to Estonia's (15,918 tonnes). In Latvia, joining a producer responsibility organisation (PRO) for used tyres provides a significant tax advantage for tyre importers — without PRO membership, importers must pay €660 per tonne of tyres placed on the market, while membership reduces this payment to about one-quarter of the original amount. This shows that the state controls imports rather than leaving this responsibility to PROs, who lack the necessary tools for such oversight.

The average fee for handling used tyres is €150–€160 per tonne (plus VAT), depending on the collection method, quantity, and regional competition.

The Latvian PROs dealing with used tyres are: SIA Zaļais Centrs, SIA Zaļā josta, AS AJ Power Recycling, SIA Latvijas Zaļais Punkts.

The similar names come from the Latvian word *zaļš*, meaning “green.”

A specific feature in Latvia is that PROs may also manage other waste streams, such as battery collection. Vertical integration is also accepted.

Obligations and Reporting

Each PRO must collect 80% of the mass of tyres placed on the market, according to its market share, and must ensure that all collected tyres are sent for recovery or recycling. This approach is based on understanding that tyres lose mass during use.

Reports on compliance must be submitted twice a year:

First-half report: by 31 August;

Audited annual report: by 30 April of the following year.

Upcoming Legislative Developments

Latvia is planning the following changes:

Mandatory PRO membership for vehicle importers;

Mandatory annual external audit for PROs;

Creation of a unified data platform enabling cross-checks between PROs, customs authorities, and the tax authority;

Requiring tyre sellers to accept used tyres at points of sale.

Main Challenges

Problem areas remain online commerce and vehicles imported by private individuals.

Tyre Recovery Methods

Material recycling: 40–50% — mostly granulation and the use of rubber granules domestically or export to Lithuania and Poland.

Energy recovery: 35–40% — tyres are shredded and used as alternative fuel at the SCHWENK Latvija cement plant

Tyre retreading: approx. 5% — retreading of tyres.

Export for processing: 10–15% — unshredded tyres are sent to Lithuania, Poland, and Germany.

What Estonia Could Learn

Rehviringlus has long advocated for reporting to the PROTO system twice a year. This is important for PROs operating in multiple markets to enable quicker mutual balancing of obligations.

Mandatory annual external audits for PROs would also be relevant in Estonia. This would provide assurance between PROs regarding each other's activities, as well as guarantee for PRO clients that they have joined an organisation that fully complies with producer responsibility obligations.

FIND ALL REHVIRINGLUS COLLECTION POINTS EASILY VIA QR CODE

The QR code is a convenient solution that helps tyre retailers inform their customers about Rehvinglus collection points where used tyres can be handed over free of charge.

Previously, tyre retailers used information boards with long, small-font lists of collection points. It was difficult to help customers find a suitable or nearby location from those lists. Since we now have 111 collection points, that solution no longer worked. We decided to use a modern method — a QR code. Additionally, the code includes our website address in case a customer's phone cannot read QR codes.

Tyre retailers can order an information board or a printed QR code label from us, or download it themselves from our website.



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www.rehviringlus.ee

MEDIA COVERAGE

<https://arvamus.postimees.ee/8250436/andres-metsoja-vanarehvide-taaskasutusega-on-eestis-endiselt-probleeme-aga-uks-voit-juba-paistab>

On 16 May, an article by Andres Metsoja, Vice-Chair of the Parliament's Environment Committee, was published in Postimees about the upcoming legislative amendment and the situation in used tyre recycling.

<https://epl.delfi.ee/artikkel/120386675/einar-teesa-lu-lopuks-ometi-peavad-automuujad-hakkama-vastutama-rehvide-eest>

On 25 June, Einar Teesalu's article appeared in EPL on the need for car dealers to join a used tyre PRO.

<https://www.err.ee/1609773153/prokuratuur-ei-algata-enefiti-rehvihakke-asjas-kriminaalmenetlust>

On 18 August ERR.

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>

If you have any questions or proposals on how to improve the work of Rehvinglus,
please get in touch with
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Share your good ideas and observations with us!