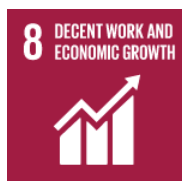


Rehviringlus

NEWSLETTER

AUTUMN 2024



DEAR CUSTOMERS AND PARTNERS OF MTÜ REHVIRINGLUS!

YOU ARE READING OUR FOURTH NEWSLETTER.

- The long-awaited legislative amendments to extend producer responsibility to passenger car importers are in the legislative proceeding of the Riigikogu.
- The first passenger car importers have joined the producer responsibility organisation (PRO).
- The statistics for the three quarters of 2024 will give you an overview of the recovery methods used this year, how many waste tyres were collected in general and how many were recovered.
- Tyre bales became a product.
- Carbon footprint of tyres used as fuel for a cement plant.
- Media overview.

WITH THE AMENDMENT TO THE WASTE ACT, IMPORTERS OF CATEGORY M1 PASSENGER CARS, CATEGORY N1 TRUCKS AND CATEGORY L2E MOPEDS WILL BECOME TYRE MANUFACTURERS.

Currently, the producer responsibility is applied to tyres of off-road vehicles defined in clause 36 of § 2 of the Road Traffic Act and to motor vehicles defined in clause 40 of § 2 of the Road Traffic Act, as well as to the tyres of their trailers, regardless of whether they are fitted to the vehicles or trailers, with the exception of tyres of category M1, N1 and L2e vehicles that are fitted to the vehicle when it is placed on the market.

For instance, if you currently import motorcycles, tractors or other agricultural and heavy machinery or their trailers, you should already have joined a producer responsibility organisation for waste tyres.

The Bill on Amendments to the Waste Act (430 SE), which concerns the economic activities of vehicle importers, is in the legislative proceeding of the Riigikogu. The Bill has passed the first reading and will likely be passed this year and enter into force from July 1, 2025.

Compared to the legislation currently in force, the definition of 'tyre manufacturer' will be broadened and amended to add that a tyre manufacturer is also a person who places tyres on the market in Estonia as a stand-alone product 'tyre' or in combination with a trailer, towed machinery, off-road vehicle or motor vehicle. The existing term only defines a tyre manufacturer as a person who places tyres on the market in Estonia as a stand-alone product 'tyre'. The entry into force of the amendment will require the tyre manufacturer to transfer the obligation of producer responsibility imposed by law to a producer responsibility organisation, as it would be unreasonable and unnecessarily costly to fulfil the producer responsibility obligation on its own.

The functions of a tyre manufacturer include:

- maintaining the collection network of waste tyres;
- 2) collecting waste tyres;
- 3) recovery of collected waste tyres;
- 4) carrying out information campaigns aimed at tyre users;
- 5) submitting data and communicating with the authorities.

If you join a producer responsibility organisation, in this case MTÜ Rehvinglus, the organisation will handle this on your behalf according to a price list based on tyre type, with different tariffs for waste tyres. For example, for manufacturers who have joined us, the tariff for passenger car, off-road vehicle and truck tyres is 110 euros per tonne.

Why choose MTÜ Rehvinglus?

- Rehvinglus is the only producer responsibility organisation for waste tyres in Estonia that has consistently fulfilled its obligations to manufacturers since its establishment in 2010.
- Rehvinglus uses seven different waste tyre recovery methods, selecting the most suitable handling method for each type of waste tyre.
- Rehvinglus has offered its customers a stable and affordable pricing policy.
- Rehvinglus communicates openly and regularly informs its customers.
- Rehvinglus is ready to co-operate with everyone who contributes to the recycling of waste tyres.
- Rehvinglus contributes to the carbon footprint calculations of its handling methods and takes climate aspects into consideration.

THE FIRST CAR IMPORTERS HAVE JOINED REHVIRINGLUS

NCG Import Baltics OÜ (importer of the Honda brand) is one of the companies that has joined the producer responsibility system in light of the new Waste Act.

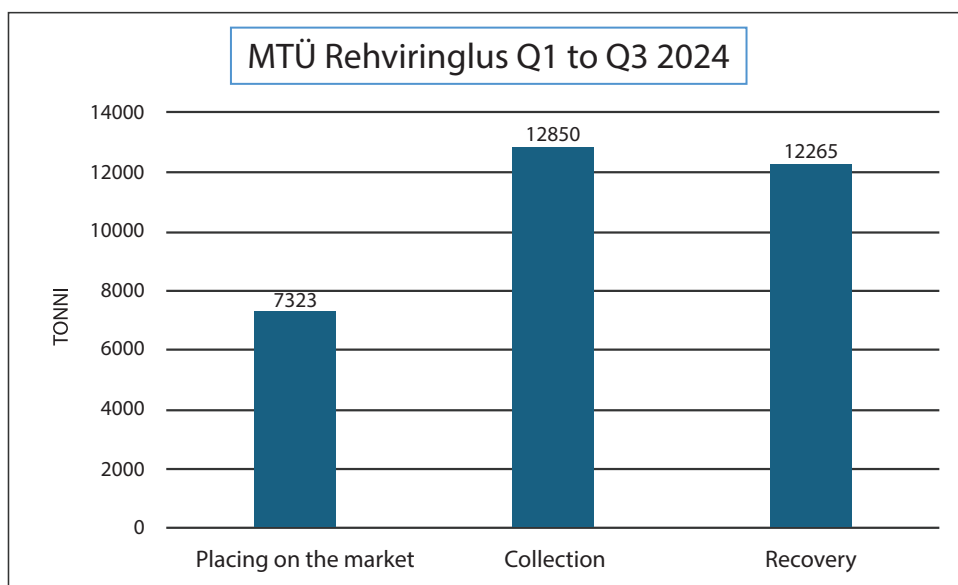
Previously, Al Mare Auto OÜ, Inchcape Motors Estonia OÜ and United Motors AS joined us, allowing them to hand over waste tyres generated in the course of their operations to the Rehvinglus collection network. Once the legislative amendment enters into force, they will also be able to easily begin declaring the tyres from the vehicles they have placed on the market.

WE ENCOURAGE ALL MOTOR VEHICLE IMPORTERS TO JOIN US AT

[HTTPS://WWW.REHVIRINGLUS.EE/JOINING](https://www.rehvinglus.ee/joining)

TODAY AND SIGN A MEMBERSHIP CONTACT, 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.

RECOVERY IN 2024



In the first three quarters of 2024, the companies that have joined Rehvinglus placed a total of 7,323 tonnes of tyres on the Estonian market.

However, we collected 12,850 tonnes of tyres. This significant gap between the placing of tyres on the market and their collection is primarily due to the fact that the general economic situation has caused a sharp decline in tyre sales. Despite this, tyres are still collected at the same level.

The remaining 'over-collection' comes from tyres of motor vehicles that enter our collection network. Freeriders – those who avoid joining the recovery system – also play a major role. Additionally, fraudulent declaration of quantities by joined companies is a possibility. In recent years, many historic tyres have been handed over as people clear out their farmyards and other areas where tyres have been stored for years. A large number of tyres have been brought in by farmers who used them to cover silage piles.

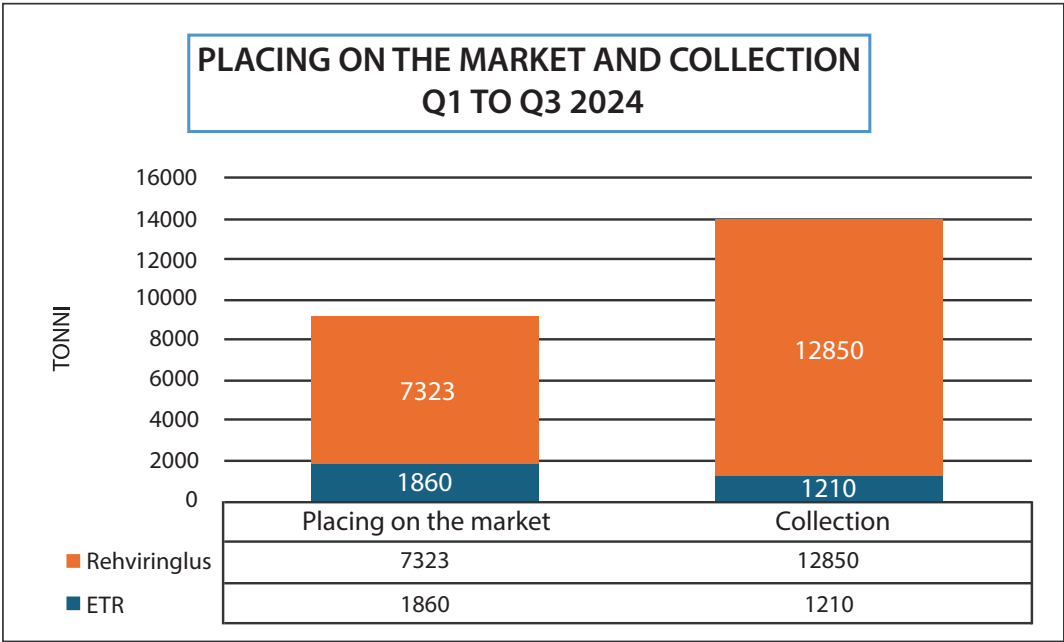
Our information campaigns and articles on tyre-related topics, where we consistently remind the public that tyre handover is free for the last user, have undoubtedly contributed to the increased collection of tyres. When comparing the ratio between tyres placed on the market and those collected, it is also important to consider tyre wear, as a tyre loses about 15–20% of its original weight over its lifetime. In addition to the above, as of the end of the third quarter, we have collected approximately 2,600 tonnes on behalf of Estonian Tire Recycling (ETR). Based on market distribution between two PROs, ETR should now catch up on its share. While ETR has collected fees from its members for placing tyres on the market, it has not collected enough tyres.

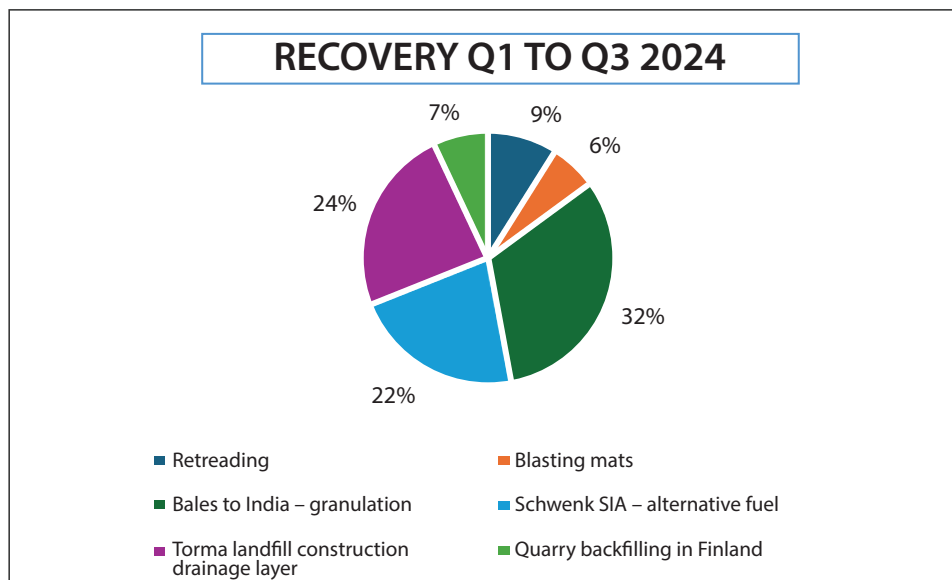
TWO YEARS AFTER ITS FOUNDING, ETR HAS STILL NOT BEGUN WASTE TYRE RECOVERY!

ACTIVITY OF WASTE TYRE PROS IN THE FIRST THREE QUARTERS OF 2024

The key indicators for the first three quarters of 2024, related to the activities of the two operating PROs, are presented in the table below.

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	196	6	110	110	7323	12850	12265
MTÜ Estonian Tire Recycling	18	1	120	75	1860	1210	-





TYRE RECOVERY HANDLING METHODS OF MTÜ REHVIRINGLUS, Q1 TO Q3 2024

MTÜ Rehviringlus uses six different recovery options in 2024. The data shown reflects the overall recovery of waste tyres in Estonia, as ETR has yet to start recovery.

Thirty-two percent of the collected waste tyres were sent to India in the form of tyre bales, where they were shredded and recycled as material. 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 treatment of leachate. Thus, 24% of the recovered tyres were used for the construction of a drainage layer at the Torma landfill in Jõgeva County. Twenty-two percent of the tyres were used as an alternative fuel in the cement industry, replacing fossil fuels. While retreading is the best recovery option, a large proportion of old tyres are in such a state that they can no longer be retreaded into new tyres. However, the 9% still represents a significant quantity of tyres that are given a new lifecycle. As some special service tyres are very bulky and difficult to handle, we sent 7% of the tyres to Finland for quarry backfilling. This method could conditionally also be called 'burying'. However, special service tyres are a good substitute for large amounts of soil that would otherwise need to be excavated. Lastly, 6% of the tyres were processed into construction mats, which are used in blasting operations, especially in Scandinavia.

THE ENVIRONMENTAL BOARD RECOGNISED TYRE BALES MADE FROM WASTE TYRES AS A PRODUCT

On 14 June 2024, the Environmental Board issued an amended environmental permit to Wastedirect OÜ, a handling partner of MTÜ Rehviringlus, allowing the company to produce selected waste tyre bales at its production unit in Ääsmäe for recycling purposes.

These can be used in the construction of roads and other infrastructure projects, such as shooting ranges and noise barriers.

The company submitted its first application in spring 2020 and was granted the right to produce and use the bales when applying for a new waste permit or registration in autumn of the same year.

The amended environmental permit allows for an annual production volume of 25,000 tonnes of tyre bales.

According to the Waste Act, waste ceases to be waste once it has undergone a recovery operation, including recycling, and the substance or object is commonly used for a specific purpose and has a market or demand. The substance or object must fulfil the technical requirements for the specific purpose and meet the legislation and product standards, and the use of the substance or object must not lead to adverse environmental or human health impacts.

In the opinion of the Consumer Protection and Technical Regulatory Authority, the product conformity has been verified. If recognition as a product leads to a clear increase in demand, the company can apply for an amendment to the waste permit and an increase in quantity. The environmental permit stipulates that the produced product must be marketed within three years.

Tyre bales have been a good recovery option for Rehvinglus as a producer responsibility organisation. Tyre bales have been successfully used in a wide range of conditions considering road type, loads and environmental conditions. Based on usage experiences in different countries, there are few restrictions on the use of tyre bales (or more broadly, waste tyres), provided their use is part of a project solution. For example, in the construction of the A421 dual motorway near Bedford, UK, tyre bales were used as part of the embankment on weak clay soil. In Estonia, tyre bales have been used in the reconstruction of the Läpi-Ojaküla road, which supports heavy equipment of the Defence Forces. Additionally, tyre bales have been used in the construction of various protective structures and shooting ranges.

The advantage of using tyre bales is their lightness, which is three times lighter than compacted sand, allowing for the construction of roads and other structures on soils with lower load-bearing capacity. Additionally, tyre bales have high water permeability, similar to gravel, which provides them with a significant advantage in road construction. Water quickly passes through the tyre bale in unpaved roads, both from the top and across, resulting in faster drying of the road and reducing the risk of the forest on one side drying out while the other side is flooded if the road culverts are clogged. It is important to note that thanks to the lightness and volume retention properties of tyre bales, the number of trucks needed to transport construction material to the site is reduced threefold in road construction compared to traditional construction materials. The amount of materials extracted from quarries used for the same road section is also reduced three times.

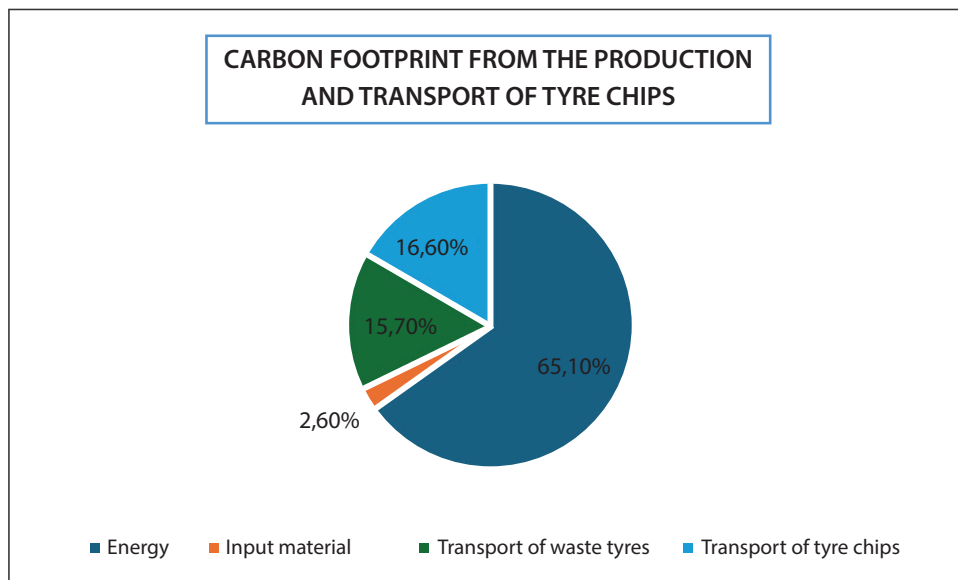
The footprint of tyre bale production is more than ten times smaller than that of tyre chip pyrolysis.



Läpi-Ojaküla road. Go ahead and drive! You can, even with the heavy machinery of the Estonian Defence Forces. Tyre bales were used in the construction of this road.

CLIMATE IMPACT OF TYRE CHIP PRODUCTION AND TRANSPORT

One of the recovery methods used by MTÜ Rehvinglus is the production of tyre chips from waste tyres, which are then transported to the Schwenk cement plant in Brocēn, Latvia, for use as alternative fuel. The climate impact of producing and transporting one tonne of tyre chips is 43.9 kg of CO₂ equivalent per tonne of tyre chips.



Energy consumption is linked to the use of diesel and electricity, with diesel accounting for 36% of the total impact and electricity 64%. For fuel, the indirect impacts associated with fuel (fuel procurement, processing, transport) are taken into account. For electricity, network losses are factored in. Transporting waste tyres to customers accounts for 16.6% of the carbon footprint, while 15.7% comes from transporting them from collection points to the shredder. The calculation was carried out by Sustinere OÜ

MEDIA COVERAGE

The previous newsletter was sent to readers on 11 April. Below are some of the key media reports from that time until the end of October.

April

Television programme Täistund on Kanal 2 on 16 April 2024 <https://duoplay.ee/8314/taistund?ep=48>
Raul Ranne's reporting on the recovery of tyres in Estonia.

<https://maaleht.delfi.ee/artikkel/120288518/einar-teesalu-ik-ka-veel-kohtab-metsa-all-vanarehve-ehkki-neid-saab-ara-anda-taiesti-tasuta>

An article by Einar Teesalu, Member of the Management Board of MTÜ Rehvinglus, which explains why it does not make sense to discard old tyres in the forest because when purchasing tyres from retailers or buying trucks, tractors or other heavy or specialised machinery, the price of tyres already includes a fee for subsequent handling.

May

<https://vikerraadio.err.ee/1609339277/keskpaevased-uudised>

News article by Jüri Nikolajev on how Enefit Power is ready to use 60,000 tonnes of tyre chips per year.

June

<https://arileht.delfi.ee/artikkel/120299878/suurettevot->

[ted-motlesid-valja-ari-eesti-puhastamiseks-vanadest-rehvidest-aga-rehve-katte-ei-saa](https://arileht.delfi.ee/artikkel/120299878/suurettevot-ted-motlesid-valja-ari-eesti-puhastamiseks-vanadest-rehvidest-aga-rehve-katte-ei-saa)

An article about how Ragn-Sells is establishing a line in Kunda that is capable of shredding nearly all old tyres generated in Estonia.

<https://virumaateataja.postimees.ee/8041771/kai-rea->

[lo-ragn-sellsi-kunda-rehviakketehasest-meie-jaoks-on-harukordne-midagi-nii-uut-avada](https://virumaateataja.postimees.ee/8041771/kai-rea-lo-ragn-sellsi-kunda-rehviakketehasest-meie-jaoks-on-harukordne-midagi-nii-uut-avada)

An article about how Ragn-Sells plans to become the leading tyre chip producer in the region with their newly opened tyre shredder

<https://majandus.postimees.ee/8040941/ragn-sells-lahend->

[ab-uue-purustusliiniga-vanarehvide-probleemi](https://majandus.postimees.ee/8040941/ragn-sells-lahend-ab-uue-purustusliiniga-vanarehvide-probleemi)

An article about how the new tyre shredding production unit T2O was opened in the Kunda industrial park, which has the capacity to shred all of Estonia's waste tyres into tyre chips.

<https://www.laanevirumaauudised.ee/uudised/2024/06/14/kun->

[da-rehvipurustustehas-aitab-metsad-puhtamad-hoida](https://www.laanevirumaauudised.ee/uudised/2024/06/14/kun-da-rehvipurustustehas-aitab-metsad-puhtamad-hoida)

An article about the opening of the new tyre shredder in Kunda.

<https://www.err.ee/1609371941/enefit-power-on-endiselt-hadas-olitoostuses-rehviakke-kasutamisega>

A news article published by Rene Kunda a day after the opening of the Kunda tyre shredder about how Enefit Power cannot use tyre chips in oil production because the quality of the oil is inconsistent.

<https://www.laanevirumaauudised.ee/arvamus/2024/06/27/vede->

[levad-rehvid-vedelikuks-kah-voimalus](https://www.laanevirumaauudised.ee/arvamus/2024/06/27/vede-levad-rehvid-vedelikuks-kah-voimalus)

An article by Einar Teesalu, Member of the Management Board of MTÜ Rehvinglus, about how all waste tyres do not need to be shredded for recovery.

July

<https://arvamus.postimees.ee/8055072/einar-teesalu-pu->

[rustame-muudi-et-on-olemas-purustiga-lahendatav-vanarehvide-probleem](https://arvamus.postimees.ee/8055072/einar-teesalu-pu-rustame-muudi-et-on-olemas-purustiga-lahendatav-vanarehvide-probleem)

An article by Einar Teesalu, Member of the Management Board of MTÜ Rehvinglus, about how there is no waste tyre problem that can be solved with a shredder.

<https://virumaateataja.postimees.ee/8059625/rehvid-on-alati-kusagil>

An article by Einar Teesalu, Member of the Management Board of MTÜ Rehvinglus, about how the storage of waste tyres is a common practice before recovery.

<https://www.toostusuudised.ee/uudised/2024/07/15/keskkon->

[naamet-andis-loa-vanarehvidest-rehviplokkide-tootmiseks](https://www.toostusuudised.ee/uudised/2024/07/15/keskkon-naamet-andis-loa-vanarehvidest-rehviplokkide-tootmiseks)

A news article by Wastedirect OÜ about how the Environmental Board issued an amended environmental permit to Wastedirect OÜ on 14 June 2024, allowing the company to produce selected waste tyre bales for recycling purposes. These can be used in the construction of roads and other infrastructure projects, such as shooting ranges and noise barriers.

<https://www.ehitusuudised.ee/uudised/2024/07/15/vanarehvidest-tohib-nuud-toota-taristumaterjale>

Construction news portal Ehitusuudised reports on the approval of tyre bales for use as a product.

October

<https://www.riigikogu.ee/komisjonide-teated/keskkonnakomis->

[jon/keskkonnakomisjonis-olid-kone-all-jaatmeprobleemid/](https://www.riigikogu.ee/komisjonide-teated/keskkonnakomis-jon/keskkonnakomisjonis-olid-kone-all-jaatmeprobleemid/)

Press release of the Environment Committee of the Riigikogu concerning the engagement event on the procedure of the Act that amends the Waste Act in the Riigikogu. Under the new legislation, vehicle importers will also become tyre importers.

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>



*Board member of the Rehviringlus Einar Teesalu
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!