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**Minutes of the meeting of the BTMA retread committee held on  
 27<sup>th</sup> May 2022 by video-conference**

|                       |                             |             |                             |                 |                 |
|-----------------------|-----------------------------|-------------|-----------------------------|-----------------|-----------------|
| <b>Present:</b>       |                             |             |                             |                 |                 |
| Chris Baxter          | <i>Hankook Tyre UK Ltd</i>  | Dan Edwards | <i>Bulldog Remoulds Ltd</i> | Justin Holloway | <i>Bandvulc</i> |
| Azeem Khan            | <i>Michelin Tyre plc</i>    |             |                             |                 |                 |
| <b>Apologies:</b>     |                             |             |                             |                 |                 |
| Dave Johnson          | <i>Michelin Tyre plc</i>    |             |                             |                 |                 |
| <b>In attendance:</b> |                             |             |                             |                 |                 |
| Graham Willson        | <i>BTMA Chief Executive</i> |             |                             |                 |                 |

**1. Welcome and apologies for absence**

| <i>Discussion</i>   | <i>Decision</i> |
|---|-----------------|
| Graham welcomed participants to the call. Apologies were received as above. | Noted.          |

**2. Compliance statement**

| <i>Discussion</i>   | <i>Decision</i>  |
|---|--|
| Graham reminded members of their responsibilities under the BTMA Competition law compliance guidelines. | Members agreed to abide by the requirements of the guidelines. |

**3. Minutes of the meeting held 16<sup>th</sup> November 2021**

| <i>Discussion</i>   | <i>Decision</i>                         |
|---|---|
| The minutes of the meeting held 16 <sup>th</sup> November 2021 were reviewed. | The minutes were validated unanimously. |

**4. Matters arising not elsewhere on the agenda: none**

**5. Government engagement**

| <i>Discussion</i>   | <i>Decision</i> |
|---|-----------------|
| Graham reported and commented on submissions made to government regarding <b>forest risk products</b> due diligence (impacting the supply of products containing natural rubber), the future of <b>Climate Change Agreements</b> post-2025 and proposals for mandatory <b>Digital Waste Tracking</b> . He also reported actions taken in pursuit of a <b>tariff suspension</b> on casing imports. Despite escalation to Rees-Mogg, the issue remains unresolved. Graham reported the publication of a <a href="#">Standard Rules Permit</a> to replace the T8 exemption that covers small retreaders but highlighted the absence of plans to remove the exemption. According to a recent report on waste crime from the National Audit Office this may not be effective until 2024. He also highlighted the publication of a free <a href="#">BS ISO standard for energy management for SMEs</a> , potentially relevant to the future CCA scheme. | Noted.          |

## 6. Casing supply chain working party

| <i>Discussion</i>  | <i>Decision</i> |
|--|-----------------|
| Graham reported the successful functioning of the working party & thanked Az for chairing and Dan for acting as secretary. Several useful descriptive documents have been produced in anticipation of EPR discussions. | Noted.          |

## 7. Retread policy study

| <i>Discussion</i>   | <i>Decision</i> |
|---|-----------------|
| Graham reported the recent reception of the draft report from Eunomia. Headline findings include reassurance that the emerging UK model of EPR seems unlikely to undermine manufacturers existing casing 'take back' arrangements. However, EPR fee modulation is recognised to be a weak influence on buyer behaviour and that other measures will be necessary to incentivise increased retreading. | Noted.          |

## 8. British Standards update

| <i>Discussion</i>  | <i>Decision</i> |
|--|-----------------|
| Graham reported actions to rejuvenate the Tyres & Wheels BSI committee (AUE/4) integrating the scope of the dormant Tyre Repairs committee (AUE/3). He also reported the withdrawal of BS AU 144 Retreaded Tyres as this has been superseded by UNECE regs 108 and 109 since 2004. | Noted.          |

## 9. 2022 Activity plan

| <i>Discussion</i>   | <i>Decision</i>  |
|---|--|
| Delivery of the 2021 activity plan was reviewed. See annex. Members discussed opportunities to improve tyre stewardship in smaller fleets. The availability of relevant data was considered to be fundamental to the transition from reactive to pro-active tyre management. Technology is increasingly available but support is needed for the initial investment by small fleets. | Graham to pursue with the technical committee the possibility to emphasise in guidance the economic and environmental benefits of improved tyre stewardship. |

## 10. Any other urgent business

| <i>Discussion</i>  | <i>Decision</i>   |
|--|---|
| <p><b>Recent ECJ judgement re EU tariffs on Chinese imports</b></p> <p>Graham gave an overview of the present situation in the EU (and N Ireland, subject to mooted changes to the N Ireland Protocol). He reported that UK was no longer subject to ECJ and that he was still awaiting clarification from Dept for International Trade regarding the GB position.</p>   | Noted.  |
| <p><b>'Declassified' retreads:</b> Retreads that don't meet Reg 109 but that still are suitable for low-speed use, eg agricultural trailers. Current practice (remove e-mark, brand, etc leaving only size, speed and load rating) renders tyre illegal for sale for road use (the targeted outcome). However, DVSA have raised concern that such a tyre could subsequently enter road use where it would not fail at MOT or roadside inspection. DVSA have suggested branding the tyre 'Not for road use' but this marking could be buffed off. Members suggested buffing off the date code as this is now a legal requirement for road use. This would prevent recall, albeit unlikely in the circumstances. Members pointed out parallels with the part-worn tyre trade – product compliance is outside the manufacturer's control.</p> | <p>Current practice is legal.</p> <p>Issue has not been raised as a problem by DVSA at MOT or roadside inspections.</p> <p>Decision: reactive response if raised by DVSA. Could include e-mark in MOT test or buff off date mark.</p> |

### Date and venue of next meeting

19<sup>th</sup> July 10:30 – 12:30. Agreement to hold on Teams unless agenda requires 'workshop' discussion.

Chief Executive: G C Willson

Incorporated in London No 927539

**Annex: 2022 activity plan**



**BTMA retread committee work plan 2022**

27-May-22

| Subject   | Delivery |       |       |       | Comment   |
|---|----------|-------|-------|-------|---|
|   | Q1'21    | Q2'21 | Q3'21 | Q4'21 |   |
| <b>5-year retread strategy</b>  |          |       |       |       |   |
| Eunomia study - policy opportunities to support retreading<br>Define & pursue preferred regulation of retreading under EPR<br>Project for improved tyre stewardship in smaller fleets |          |       |       |       | Draft report received 20th May<br>Outline for packaging EPR is published<br>Deliverable? Partner? |
| <b>Communication</b>  |          |       |       |       |   |
| Leverage labelling for retreads - eg comms re CO2 savings<br>Leverage WPP, CoP26, etc in support of retreading<br>Consider participation at Trade events / retread industry event     |          |       |       |       | Awaiting publication<br>WPP publication delayed<br>Objective? Audience? Message?                  |
| <b>Reduce regulatory burden for retreaders</b>  |          |       |       |       |   |
| Avoid onerous environmental regulation for retreaders   |          |       |       |       | Awaiting exemptions announcement  |
| <b>Relief from Climate Change Levy for retreaders post March 2025</b>   |          |       |       |       |   |
| Pursue retreader eligibility once future criteria are known   |          |       |       |       | Risk that bar will be set too high  |
| <b>Collation &amp; presentation of UK retread data</b>  |          |       |       |       |   |
| Collate & aggregate annual data. Map progress against 5-yr plan   |          |       |       |       | Data collected  |