



Selected waste management indicators in the area of tyre take-back for 2023

Evaluation of annual reports for 2023

The issue of waste tyres has been addressed since 1 January 2021 by Act No. 542/2020 Coll., on end-of-life products (hereinafter referred to as the "ELP Act"), which, among other things, deals with the issue of tyre take-back in Sections 91 to 100. Since the ELV Act came into force, it has been firmly established that every manufacturer or importer fulfilling their obligations either individually or collectively must have one take-back point in every municipality with extended powers and in every district of statutory cities.

The take-back of tyres is not (with the exception of the general Article 8a of Directive 2008/98/EC on waste, as amended by subsequent directives) regulated in detail by EU legislation, as is the case, for example, with batteries or end-of-life vehicles (car wrecks). Under Regulation (EC) No 1013/2006 of the European Parliament and of the Council on shipments of waste, tyres are on the green list. For more information, visit <https://mzp.gov.cz/cz/agenda/odpadove-hospodarstvi-a-cirkularni-ekonomika/odpady/preshranicni-preprava-odpadu/preprava>.

The first and so far only company, ELT Management Company Czech Republic s.r.o. (hereinafter referred to as "ELTMA"), obtained authorisation to operate a collective system for fulfilling legal obligations in the field of tyres on 15 April 2016. From this date, manufacturers can fulfil their take-back obligations through the collective system. For the reporting year 2023, 246 manufacturers took advantage of this option.

The progress of tyre take-back was monitored on the basis of available data from 2009 to the reporting year 2023. The evaluated data show that the amount of tyre take-back has been increasing every year since 2014. In the reporting year 2023, the take-back rate was 83.7%, an increase of 0.1% compared to 2022. It can be concluded that the Czech Republic as a whole meets the take-back rate set by law and that there are only a few companies that do not meet this rate, some of them unfortunately repeatedly. An amendment to the Waste Act in 2018 increased the mandatory take-back rate for tyres from 35% to 65%, and the Act on Waste Management increased the take-back rate for tyres for 2021 to 70%. From 2022, the mandatory take-back rate for tyres is set at 80%.

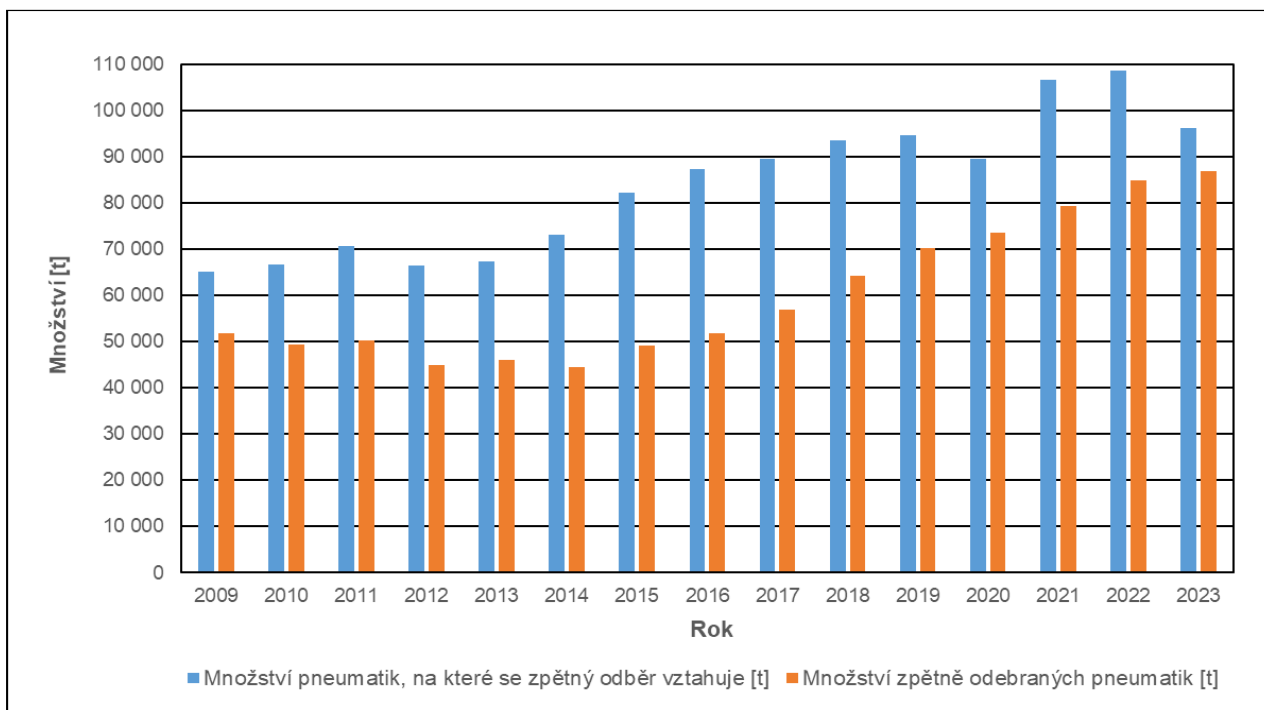
The main source of data are the annual reports of obligated persons, i.e. producers under the Waste Management Act, which are sent to the Ministry of the Environment (hereinafter referred to as "MoE") by 31 March of the following calendar year in accordance with Section 28(1) of the VUŽ Act and the collective system report submitted by 30 June of the following calendar year in accordance with Section 46(5) of the VUŽ Act. Persons placing tyres on the market have been required to prepare an annual report on the fulfilment of their take-back obligations since 2002.

The number of tyres subject to take-back obligations rose slightly in 2010 and 2011 after a sharp decline in 2009 (probably due to the economic recession). After another decline in 2012, there has been another increase in the number of tyres covered by take-back obligations, mainly due to an increase in the number of obligated entities submitting annual reports. (see Chart 1). The increase in the number of obligated entities was probably caused by better enforcement of the obligations applicable to obligated entities in connection with new legislation, effective from 1

January 2014. From the 2015 reporting year, the number of tyres placed on the market increased significantly, and this increase continued into the 2019 reporting year. However, in the 2020 reporting year, there was a 5.54% decrease in the number of tyres placed on the market. We assume that this decrease was due to the economic impact of government measures related to the COVID-19 pandemic. A lockdown was declared, i.e. a state in which shops, businesses and other facilities were closed to consumers. As a result, normal purchases did not take place. In 2021, there was a significant increase in the number of tyres placed on the market, most likely due to the easing of market restrictions (in connection with the Covid-19 pandemic), when shops, businesses and other facilities reopened. As a result, manufacturers resumed the production and marketing of tyres. The economic situation of manufacturers and retailers also improved as people began to buy tyres again. In the last year assessed, 2023, the amount of tyres taken back continued to increase; the amount of tyres covered by take-back decreased.

In 2023, annual reports were submitted by 111 individual performers and one annual report by the operator of the ELTMA collective system – this report for 2023 included reports for 246 obligated persons who fulfilled their obligations through this collective system. There was again an increase in the number of persons preferring collective compliance compared to previous years.

Graph 1: Development of the quantity of tyres placed on the market and taken back in tonnes in the monitored period 2009-2023 (as of 2 December 2024)



Source: CENIA

In 2023, 86,884.456 tonnes of tyres were taken back out of a total of 96,274.717 tonnes placed on the market, representing a take-back rate of 83.7%. This represents a year-on-year increase of 1.1% compared to the previous year (see Table 1).

Table 1 – Summary results of tyre take-back in the Czech Republic in the period 2009–2023

Year	Quantity of tyres covered by take-back [t]	Quantity of tyres collected [t]	Number of reports	Number of manufacturers	ZOV success rate [%]
2009	65,066.857	51,880.125	59	65	79.7
2010	66,770.690	49,389.280	52	58	74.0
2011	70,672.020	50,341.910	56	59	71.2
2012	66,439.580	44,855.110	62	62	67.5
2013	67,256.966	46,120.247	87 *	87 *	68.6
2014	73,084.426	44,606.113	120	145 **	61.0
2015	82 149,629	49,261.842	140	165 **	60.0
2016	87,366.003	51,907.377	156	183 ***	59.4
2017	89,578.568	56,941.244	141	191 ***	63.6
2018	93,447.615	64,338.712	135	194 ***	68.9
2019	94,694.492	70,202.076	146	213 ***	74.1
2020	89,445.537	73,590.424	144	231 ***	82.3
2021 ****	106,630.820	79,399.771	122	304 ***	81.9
2022	108,681.217	84,974.945	108	321 ***	83.6
2023	96,274.717	86,884.456	111	356 ***	83.7

Source: Ministry of the Environment and CENIA

Notes:

* Includes GUMMYLAND s.r.o. – not a mandatory entity.

** Including affiliated entities.

*** Including entities for which the ELTMA collective system submitted a report.

**** From 2021, the assessment of the ZOV level [%] is in accordance with the provisions of Section 93(c) of the VUŽ Act (the level of waste tyre take-back is a percentage calculated by multiplying the total weight of waste tyres obtained by the tyre manufacturer through take-back in a given calendar year is multiplied by the number of years during which the tyres were placed on the market within a three-year period ending in that year and divided by the total weight of tyres placed on the market by the manufacturer in that calendar year and in the two previous calendar years and which were not exported or delivered to another Member State).

The annual tyre take-back reports show that in 2023, 25% of waste tyres were used for energy recovery, 72.08% were used for material recovery and 0.26% were reused (retreaded) (see Table 2). Data on the share of material and energy recovery of waste tyres may be affected by inaccurate records of final tyre processing. Obligated entities often do not list the final tyre processor as a partner, but only the transporter or intermediary. This distorts information on the actual handling of tyres.

Since 2009, Table 2 relates tyre disposal to the total quantity of products actually disposed of in a given year. This quantity does not include the so-called stockpiles from the previous year (C00) that were disposed of in the given reporting year (), and therefore this basis is irrelevant. The total sum of all disposal methods in the relevant year may therefore not be 100%.

Table 2 – Tyre disposal in the Czech Republic in the period 2009–2023, relative to the total quantity of products taken back (as of 2 December 2024)

Year	Total quantity of ZOV [t]	Reuse [%]	Material recovery [%]	Energy recovery [%]	Disposal by incineration D10 [%]	Other methods [%] *	Remaining in stock
2009	51,880.125	3.45	14.52	71.92	0.02	8.08	2.21
2010	49,389.280	4.61	12.10	75.37	0.02	7.89	0.10
2011	50,341.910	0.00	28.17	54.72	0.01	11.36	2.74
2012	44,855.110	0.00	32.76	59.17	0.15	0.49	0.74
2013	46 120.247	0.00	20.34	61.58	0.11	0.06	0.39
2014	44,606.110	4.06	27.88	58.15	0.06	7.65	0.94
2015	49,261.842	2.58	32.88	51.34	0.07	7.11	6.47
2016	51,907.377	1.99	40.93	55.52	0.09	0.01	2.76
2017	56,941.244	1.32	51.17	46.84	0.01	1.68	1.48
2018	64,338.712	1.10	65.35	32.32	0.00	0.46	2.06
2019	70,202.076	1.42	49.65	46.79	0.00	0.03	3.99
2020	73,590.424	1.77	62.01	35.87	0.00	0.00	3.99
2021	79,399.771	0.64	64.38	34.43	0.00	0.53	3.70
2022	84,974.945	0.21	67.41	29.50	0.00	1.57	4.75
2023	86,884.456	0.26	72.08	25.00	0.00	1.01	6.31

Source: Ministry of the Environment and CENIA

Notes: Other methods of disposal – reported in 2009 and 2010 as conversion of waste into fuel for final energy recovery (R1). In 2011, 'Other methods' included disposal codes N3 and N12. Since 2012, this disposal method has included codes D2, D8, D9 and N14.

The register of take-back points is maintained by the Ministry of the Environment within the VISOH2 system, <https://visoh2.mzp.cz/RegistrMistZO/RegistrMistZOPublic>, together with a map of take-back points:

<https://visoh2.mzp.cz/RegistrMistZO/RegistrMistZOPublic/MapaMistZpetOdberu>.

The ELTMA collective system operator also maintains its own map of take-back points here: <https://www.eltma.cz/sberna-mista>.

Information on the take-back of tyres by obligated persons

The quantity of products covered by take-back in 2023 fell by 12,406.5 tonnes compared to 2022, to a total of 96,274.717 tonnes. A total of 13 entities failed to meet the product take-back level set by the VUŽ Act (i.e. the 80% set by law). Four tyre manufacturers who failed to meet their obligation were unable to meet the legal limit because they placed zero tyres on the market and did not carry out any take-back. These four manufacturers submitted so-called "zero reports".

Overall, the Czech Republic met the legal limit in 2023 and achieved an 83.7% tyre take-back rate. The take-back level increased by 0.1% compared to 2022¹.

Inspection activities (2023)

The Czech Environmental Inspectorate (ČIŽP) is the supervisory authority responsible for enforcing statutory take-back obligations. In 2023, the CEI carried out 64 inspections in the area of tyre take-back. These involved investigations into cross-border tyre transporters, final sellers, take-back point operators and suspected illegal tyre disposal.

Seven complaints from the public were also investigated. Three of these complaints highlighted problems with the return of tyres at tyre collection points (mostly refusal to accept tyres or making collection conditional on a fee or the purchase of new tyres).

Fines were imposed on six obligated persons. For example, a fine was imposed on a manufacturer for failing to report the operation of a facility and for failing to prove that it had handed over the waste it produces in the appropriate quantity and in the prescribed manner. Furthermore, the CEI imposed a fine on an individual tyre manufacturer for failing to meet the minimum take-back level.

¹ Since 2021, the assessment of the "ZOV level [%]" has been in accordance with the provisions of Section 93(c) of the VUŽ Act. Therefore, this value cannot be directly compared with years prior to 2021. Such a comparison can only be made in future years, when the level will also be calculated using the new method specified above.