

Preparatory study and impact assessment support study on tyres

ESPR SR8: Tyres

Specific contract 2025/4500082801/ENV.B4/GROW under framework contract in cascade No
ENV.B.4/FRA/2023/0018 Lot 1

Second Stakeholder Meeting of ESPR for tyres

Date & time: 8 June 2026, 9h00-17h00
Location: Conference Centre Albert Borschette - room 2B
Online participation via TEAMS

Purpose of the meeting

Second Stakeholder Meeting, to present and discuss the results of the Preparatory Study Phase II – Tasks 5-7.

Documents relating to the meeting (slides and study tasks) may be downloaded from the project website: <https://ecodesign-tyres.eu/en/documents>

These minutes are split into an overview summary of each section, followed by individual comments of attending participants.

Participants

Study Team

VITO	Nele Kelchtermans
Oeko-Institut (OEKO)	Daniel Hinchliffe (DH), Yifaat Baron (YB), <i>Online:</i> Diana Hay, Izabela Kosińska-Terrade, Felix Mayer
Ecomatters	Max Sonnen, Maria Papavasileiou (MP)
Trinomics	Laurent Zibell
European Commission (EC)	DG ENV: Lie Heymans, Pierre Henry DG GROW: Alexander Von Campenhausen

List of organisations registered for the meeting (online and in presence):

- 4TheRecord / RAIN Alliance
- Akvaplan-niva
- ALIAPUR
- Apollo Tyres
- Avery Dennison
- BAM
- BASF
- BIPAVER EEIG
- BMUKN
- Bridgestone
- Cefic
- Continental
- Continental Reifen Deutschland GmbH
- CUST
- Danish EPA
- Decathlon
- DECATHLON SE
- Dow Silicones Belgium srl
- Ecomatters B.V.
- ECOS
- elanova
- Emissions Analytics
- ETRMA
- EUnited ASBL
- European Commission, DG ENV
- European Commission, DG GROW
- European Tyre and Rubber Manufacturers' Association
- Exxon Mobil
- Febelauto vzw
- French Ministry for Ecological Transition
- FSLCI
- GDSO
- Genan
- Goodyear
- GS1
- Hana Technologies
- ID Tech Solutions
- IISRP
- Kenda Europe
- Kenda Tyres

- LANXESS Deutschland GmbH
- Michelin
- Ministère de l'Intérieur
- Mobivia
- Nexen Tire sro
- NILU
- Norwegian Environment Agency
- NXP
- Oeko-Institut
- ORZEL S.A.
- PEW Trust
- Pirelli & C. S.p.A.
- RecyBEM/Stichting Fonds Band en Milieu
- Recycling Europe
- REGOM
- RIGDON
- Rijkswaterstaat
- RIVA Group
- Shell
- Swedish Chemicals Agency
- Swedish Energy Agency
- Swedish Environmental Protection Agency
- Synthos S.A.
- The Norwegian Environment Agency
- The Pew Charitable Trusts
- Tire Industry research
- Trinomics B.V.
- TUV SUD
- Tyre Specialists of Finland (ARL r.y.)
- UPM Biorefining
- UTAC
- Verband der Chemischen Industrie e.V.
- VITO

Agenda

Time	Topic	Presenting Institution
9:00	Arrival and registration	
9:30	Welcome and introduction	EC + Study team
9:45	Recap of Tasks 1-4	OEKO
10:00	Task 5	Ecomatters, OEKO

Meeting Minutes of ESPR-SR8
Preparatory study and impact assessment support study on tyres

Time	Topic	Presenting Institution
10:45	Coffee break	
11:00	Substances of Concern	OEKO
11:30	Task 6	OEKO
12:30	Lunch break (assume 15 min to re-enter the building)	
13:45	Task 7	OEKO
15:15	Coffee break	
15:30	Digital Product Passport (DPP)	OEKO
16:30	Wrap up and next steps	OEKO
16:45	End of meeting	

These meeting minutes are intended to summarise the main points discussed during the meeting. While every effort has been made to ensure accuracy, the notes may not fully reflect all details of the discussion. The meeting was organised by the consultant; therefore, any opinions or statements recorded do not represent the views of the European Commission.

Introduction and Recap

Introduction to the ESPR tyres study – Oeko-Institut, Daniel Hinchliffe

Daniel Hinchliffe from Oeko-Institut provided an introduction to the overall aim and methodology of the meeting and ESPR study on tyres.

Introduction to ESPR – DG ENV, Lie Heymans

Lie Heymans, Policy Officer from DG Environment, provided an introduction to the Ecodesign for Sustainable Products Regulation, which this study on tyres is part of (a brief repetition of the introduction presented in the 1st Stakeholder Meeting in October 2025).

Tasks 1-4: Recap – Oeko-Institut, Yifaat Baron

Yifaat Baron from Oeko-Institut summarised the work performed and the conclusions reached up to the 1st Stakeholder Meeting held in October 2025, which addressed MEERP Tasks 1 through 4 and the 'Base Case Definition'.

Minutes: Introduction T1-4 Recap Stakeholder discussion

Tyres Europe: Suggests to identify and fill data gaps as well as discussing in the meeting how to fill the data gaps. There are many price-driven aspects for reviving or promoting the retreading markets. The project recommendations need transparency and should be updated with the absolute latest data.

--> **YB, OEKO:** Meeting aim is to allow stakeholders to comment on the existing data and gaps. Therefore, the final report for Tasks 1-4 shall still be revised to include data that has been submitted in the meantime. The stakeholders shall provide information to fill the gaps that have been identified in the draft reports for Tasks 1-4.

Task 5 – Ecomatters, Maria Papavasileiou and Max Sonnen

Goal of the assessments is to calculate the environmental impact of each base case using a life cycle assessment (LCA) and the financial impacts using Life cycle costing (LCC). The method was applied and conducted per base case, looking at one tyre over its lifetime. The data was overall assessed as high quality, much coming from stakeholders and scientific literature. The base case definition, as already presented, was aligned to the three main tyre classes (C1, C2, C3) and to retreaded C3 tyres, as average products per category on the EU market.

The presentation included LCA/LCC data inputs explanation. LCA and LCC results were presented per base case, as well as the identified impact hotspots. Assessment on microplastics was presented. LCA and LCC results on a stock level (EU-27) were also presented. See slides for details.

Stakeholders questioned the modelling choices regarding the end-of-life stage of tyres. Specifically, stakeholders reacted to the comparison of the impact of each EoL method calculated per kg tyre and in particular the comparison between mechanical recycling and use as fuel in cement kiln. They did not agree with the results of mechanical recycling having a higher impact than incineration in cement kiln as this seems to contradict the waste hierarchy. It was explained that recycling credits allocated to mechanical recycling outputs are not high because of the quality ratios applied to the recycled rubber, while savings occur through substitution of lignite coal in cement plants. The PEF methodology limits the study in terms of credits allocations on such occasions.

Stakeholders commented on the data quality and accessibility of the study. They mention that they have provided data that is not used in the study and that they had difficulty in cross-referencing the data taken from the previous Tasks. Furthermore, a stakeholder stated they cannot follow well since no updated version of the Tasks 1-4 report has been shared since the first stakeholder meeting.

A stakeholder noted that including the use phase in such assessments might shift the focus of the study away from eco-design solutions. The study team confirmed that they are looking at design options targeting specifically raw material substitution and other improvements that are not only related to the use phase.

Some stakeholders expressed interest in setting up informal working groups to promote better understanding for design options.

The online comments clarified several methodological assumptions used in the study. Differences between C3 tyres and retreaded C3 tyres are mainly explained by variations in input data, such as raw materials and manufacturing, while use-phase values remain the same because both scenarios represent the same C3 tyre. The assumed 7.2% share of pyrolysis is based on current stakeholder information, reflecting its limited but relevant contribution to end-of-life tyre treatment, although it is still classified as energy recovery. The freshwater ecotoxicity impact of tyre abrasion was calculated using the USEtox™ framework, following the methodology adopted in the PEFCR for synthetic turf. For retreaded C3 tyres, the use-phase impacts on CO₂ and particle emissions were assumed to match those of standard C3 tyres because high-quality retreads can achieve comparable rolling resistance, with sensitivity analyses exploring slightly poorer performance. Finally, it was noted that end-of-life credits depend strongly on

the energy mix, with cleaner energy systems expected to reduce the relative climate benefits of energy recovery compared with recycling.

Minutes: T5 LCA Stakeholder discussion

Genan Holding A/S: Appreciate the work to support improving tyres and environmental impacts for the EU. On LCA results – Genan has made LCA studies since 2008. They always compare mechanical recycling with incineration – the most two common routes in the EU. Genan has very different results from the project study, and they wonder how or why the study only compares closed loop applications? Industry uses open loop applications, like rubber mats, where they substitute rubber almost 1 to 1. The assessment/ application does not make sense because the project team might be avoiding emissions. The waste hierarchy does not seem to be applied for incineration. Therefore, what is the base for the comparison? Furthermore, substitution makes no sense and must compare considering the application.

--> **(MP), Ecomatters:** The method does not consider closed-loop recycling and is limited by the circular footprint formula. We consider substitution of virgin rubber with recycled rubber via mechanical recycling, but not on a 1:1 ratio. As per CFF, we use quality ratios and for now we determined the quality ratio between recycled and virgin rubber based on economic values.

Genan Holding A/S: Genan do not see the relevance of economic value.

Recycling Europe: The project team is requested to please not use the term ‘down-cycling’, since this is not defined in any legislation. Instead use ‘recycling’.

Certain aspects should be addressed, and there is general agreement with Lars Raahauge (Genan Holding). Does the study consider the number of lifetimes a recycled/ retreaded tyre passes through? How are materials ‘saved’ in the assessment under case 4? It is difficult to understand how incineration can be considered ‘better’ than other methods of recycling.

--> **MP, Ecomatters:** The project team always assumes one lifecycle and uses the Circular Footprint Formula. Multiple lifecycles are investigated in the next tasks. Regarding the comment on incineration looking “better” than other methods of recycling, it is all related with the credits awarded to the system by avoiding fossil fuels used in cement kilns such as lignite. More specific input from stakeholders could help to refine the Circular Footprint Formula.

Tyres Europe: the study seems to proceed without having incorporated the data that was provided in the meantime since the October 2025 meeting, e.g. the LCC. The project proposals do not seem to enable environmental protections. When will the data be included in the assessment?

--> **MP, Ecomatters:** Stakeholder data shall be included.

ECOS: There is concern that there is cross-referencing to the first part of the study, which has not yet been updated. The study needs to be performed accurately, with clear referencing to the previous conclusions to ensure the quality. It would be wise if the study could slow down and be performed more methodically to allow more correct assessments.

Retail organisation: Disagree with the design to include 'use' in the assessment. This would imply that to improve the environmental impact of tyres, drivers only need to be taught to drive in a better, more environmentally friendly manner.

--> **MP, Ecomatters:** Agreed, for this reason the study emphasizes also other life cycle stages. This will be discussed in the following presentations.

BIPAVER: The weight of a tyre itself, especially C3 tyre, needs to be considered in the assessments. The study should also consider general transport distribution. For the LCC, there is a wish to address pricing for C2 tyres, which seems to be an average that may not reflect the EU so accurately (e.g. for rim diameter 22.5). Furthermore, there is a wish to ask the group to set up informal working groups to promote better understanding for design options, which Bipaver would be interested in joining.

--> **YB, OEKO:** such a working group shall be discussed with project team and EC on whether can be organised.

--> **Many stakeholders** expressed interest in joining such a working group.

Genan Holding A/S: How will the quality of the assessments be ensured, if the timeline and budget for the assessments are so tight?

Tyres EUROPE: Will you reconsider the timeline seeing as there are comments on the process? Also, a question for the EC if we hope to have good regulation.

--> **EC:** The legislation is currently at the preparatory stage. The consultant is expected to assess all feedback. It may be useful to have another feedback round on the revised study versions.

T5 Substances of Concern – Oeko-Institut, Yifaat Baron

Slides were presented by Yifaat based on the SoC report. The presentation was significantly shortened to allow time for the discussion. It focused on aspects that had changed in the slides since they were circulated after an exchange with the EC on SoC regulation under ESPR. In essence: the proposal to exclude a complete SoC category (Article 2(27)(b) SoCs) may be questionable from a legal perspective. Furthermore, the binary approach of providing information on substances (contained above the threshold or not) may also not be possible and an alternative indication of the range of the substance contained was proposed as an alternative.

Stakeholders questioned the necessity to provide information on Article 2(27)(a,b and c) SoCs. However, such information requirements are default in the ESPR and exemptions need to be justified and it is not clear if complete categories can be exempted. Furthermore, for categories a and c the information needs to be collected already and providing information on such substances is assumed to be required. The waste management sector expressed the usefulness of having such information. They explained that recyclers "inherit" substances, and need to prove compliance with End-of-Waste criterion. This is a significant burden for which they currently don't have the information.

A stakeholder referred to the need for clarification on which analytical tools should be used (or whether they need to be developed). Concern was raised that without specification in the legislation this could result in a non-harmonised implementation by stakeholders. It was further requested to substantiate the impacts of the various materials on recycling and to be more transparent as to data points when these are used as a basis for a potential ban (e.g., case of bromobutyl).

Stakeholders discussed the way that certain Article 2(27)(d) substances are addressed, namely, batteries, PU foams and sticky gels of silent tyres and self-sealing tyres respectively. The views here differ depending on the sector. While recyclers see the damages caused by these substances and related materials, manufacturers argue that they can be dealt with without introducing bans. It is clear that more transparency is needed but on how much it was suggested that manufacturers and recyclers discuss bilaterally what level of information would allow moving up the waste hierarchy. Manufacturers also raised the need to look at impacts on manufacturers and not just at impacts on recyclers.

On the question whether reporting should be at the product level or at the relevant material level, concern was raised that the weight of steel will skew the results, suggesting to consider how this could be avoided if the product level was allowed. The recyclers association proposed that the concentration of SoCs is measured in the rubber only, i.e. excluding steel due to its impact on concentration due to weight. Ideally they would like to know the concentration of each substance in the end product.

A silica manufacturer stated that ECHA is considering including all powders as SoC. This would make compliance for all filler materials problematic as it will be impossible to report on all such fillers. They were urged to substantiate the case if an exemption is sought.

A stakeholder raised the difficulty of reporting category b substances due to lacking data in the supply chain. It was explained that for such substances, if they are used in an article they do not need to be reported, but rather only as substances or mixtures under certain conditions. The stakeholder was asked to provide additional information in this respect.

A working group could be arranged to have bilateral discussions on the different aspects. Interested stakeholders are encouraged to indicate their wish to participate by email.

Pierre Henry, EC: encouraged participation in a working group if one is established. Consider the different legal articles that address SoC, which is a different approach from the other legal requirements. Justification for exemptions must be provided.

Minutes: T5 SoC Stakeholder discussion:

Tyres Europe: need more data and understanding of the impact of recycling. Clarification is needed on whether analytical tools should be developed or used, to be stipulated in the Regulation. Certain questions arise: What is the impact on recycling? (the response requires substantiation). This was mentioned in relation to the reference to bromo-butyl in tyre liners and the proposal to ban bromo-butyl and limit the use of chloro-butyl as far as possible. What is the goal of the REACH process? (A proper assessment that includes the base data.)

--> **YB, OEKO:** The collection of information under cases A and C is already required. ESPR requires reporting on all category A-C substances, the substances are given by other legislation and only

exemptions can be discussed. As for Category D, the inclusion of the specific substances can be discussed.

Recycling Europe: When a threshold is proposed for reporting tyre substances, the substances are inherited by recyclers who need to prove compliance with End-of-Waste criterion. This is a significant burden for which they don't have the information. If the thresholds are set, the weight of steel would be substantial when reporting on concentration. Therefore, the concentration in SoCs should be measured in the rubber only.

Should reporting be on the relevant material or on other materials?

Genan Holding A/S: support that recyclers and dismantlers work together. How can the market change to encourage fewer tyres ending in kilns and more being recycled, in order to respect the waste hierarchy and protect the environment? More information about the materials in the tyres is needed in order to understand how recycling can best be encouraged.

Evonik Operations GmbH, producer for Silica : ECHA is currently classifying all types of powders as SoC. Can assume that all kinds of tyres will need to report their fillers in ESPR above 0.1%. In near future each and every filler may need to be classified as SoC. This would bring into an impossible situation with recyclers. Is this the goal or is the project team aware of these developments?

--> **YB, OEKO:** ESPR has a requirement that allows exemptions. These exemptions could be investigated and a proposal could be submitted.

Europur, foam producer trade organisation: on a, b and c substances: a and c are relatively well defined, c tends to be substances that tend to be banned; a substances tend to have good supply chain communication. b substances are different: SOC thresholds need to be defined in a certain list. However, if someone makes an article first, that is never accompanied by a safety sheet. So if you make an article and pass to tyre manufacturer, they would never get this information. Combined with fact that there are a wild number of materials, the exclusion in DPP proposals was welcome.

PUR foam enabling silent tyres are useful to society as they reduce the noise burden, it is surprising that it hits the recycling process. Foam is an article, which make it difficult to deal with as it is not a substance.

Tyres Europe: the fundamental impact assessment on tyre manufacturing is missing.

--> **YB, OEKO:** Will go over the different proposals: who is interested in joining such a working group. What are the questions. Where do you agree, where do you not agree.

Task 6 – Oeko-Institut, Daniel Hinchliffe

The goal of Task 6 is to address the design options, looking at 1) specific design options considered; 2) Technical and Economic Feasibility; and 3) Quantification of their impacts on Bill of Materials,

performance, EoL and costs. The quantifications enable determination of the policy option impacts in Task 7 for the EU. Fourteen (14) aspects were considered, grouped into four pathways (pathway A through D) and 'Enablers'.

The main aspects quantified in deeper detail were:

- Pathway A) Closing the Loop: recycled content and substances of concern. Here it was considered what would be needed to go for closed loop recycling in terms of devulcanization and pyrolysis, whilst removing or labelling substances that hinder recycling processes. We would like to know from stakeholders how feasible this is.
- Pathway B) Bio-based content targets: can higher levels of bio-based content improve environmental performance.
- Pathway C) use phase: only considered extrusion spikes, since use phase rolling resistance and abrasion are handled by UN R117 and Euro 7.
- Pathway D) Lifetime extension: considered extending lifetime, also through a potential retreadability standard.

In each case, data and feedback so far limited so require better information on costing and impacts.

For recycled content and bio-based content targets, the presentation also covered potential timelines and targets to start the discussion.

Stakeholders from the chemical supply industry pointed out that there are challenges with changing from bromobutyl to chlorobutyl in the supply chain, and that information requirements may be better than outright bans as a way to deal with problematic substances for recycling. Recyclers indicate that innovations by manufacturers which do not take recycling practices into account cause major issues in the recycling process. While recycling may in theory be possible it is somehow necessary to identify these materials and pay for the new processes to deal with them. More quantitative data to back up claims of "problematic for recycling" is needed, since too much appears anecdotal currently. Recycling Europe greet the separation of recycled content into rubber compounds and reinforcement materials.

Several stakeholders state the need for better consideration of feasibility and costs on industry and R&D is needed, particularly on recycled content / devulcanization / bio-based content. Mass balancing should be referenced more clearly and considerations.

Minutes: T6 Design Options Stakeholder discussion

ExxonMobil Petroleum and Chemical BV: largest supplier of butyl rubber worldwide. 70 to 75% of products sold are bromobutyl, because it adheres better than chlorobutyl. Even if customers find a way to reformulate it the question would be if we could go up to 100% chlorobutyl – we could not ramp it up from one day to the next as some of our plants produce bromobutyl only. I am not sure if we could easily shift a bromobutyl plant to chlorobutyl as in some countries where we have plants it is banned. My question – what is the relevance of the comments on chlorobutyl being less problematic for tyres in recycling? Can it be quantified better?

DOW: Considering materials that affect recycling, DOW is hesitant to encourage a ban. A ban would be disproportionate and self-sealing tyres/ noise reduction can be dealt with better through information requirements. The goal should be to direct consumers to the best solutions and thereafter address recyclability solutions. Perhaps we need to see how recyclability improves for things where it has not yet been solved. It is important to consider safety features of the proposed solutions. Would be interested in addressing these aspects in the working groups.

Recycling Europe: we applaud the separation between rubber and reinforcing materials. On the substances that affect recycling: we keep hearing from manufacturers that they have a solution for certain materials but we still have problems in recycling that cannot be solved. Some of my members report on more than one fire per week. The implications of this is that recycling sites are no longer able to be insured. How can we exist without insurance? Maybe we need to start using the arguments of recyclers who know their processes. There is a lot of talk of adding a step or removing a material in order to recycle this – but this is all added costs when you try to do that with a couple of thousand tyres an hour – who will cover extra costs for machines, personnel, etc.? The discussion should more seriously consider concerns of recyclers.

Tyres Europe: we have concerns that some of the evidence presented is very anecdotal. We would encourage to have a good look at everything, to go into more detail. You said yourself, when we look at recycled content, a lot depends on capacities on the market – we cannot just jump from 1 to 100. This starts with definitions – how to report, how to measure. We talk about devulcanization but there is no clear definition. How do we start analysing what is possible without having the definitions in place? You cannot put rCB and recycled rubber in the same basket and we need to talk about the costs of adding recycling materials and the costs of removing hindering materials – there is a reason to use certain materials. We are talking about excluding natural rubber from bio-based content targets – do we not want to incentivise it? We need to have the market development... we could go on and we will provide feedback but we cannot move on without adjusting the values first.

Tyres Europe: currently impossible to define retreadability via a standard – will need to involve different working groups – this requires more than just mapping stakeholder opinions. We will provide feedback, also on challenges.

Tire Industry research :

- No effective commercially viable process for devulcanization – it means that in the lifetime the connections change – you end up smashing all the links. It is theoretically possible but will not be able to scale up fast enough.
- To convert from fossil based materials to bio-based will be very difficult and costly
- Recycled content: you need a definition on that. You refer to rice husk ash – we grow some in Italy but most of it grown in Asia – it will cost more to bring it here than the savings from conventional silica processes to bio-based sources.
- In many DOs you say we should use this or that material – how will you be able to analyse a tyre and say if compliant and who will pay for that? How can compliance be tested and

measured? EUD-compliant materials do not exist, since compliance is in the meta-data and not in the material itself.

Genan Holding A/S: first point: on the first question of the market outlook after 2031 when restrictions on playground infill - at the moment, 6% of our production goes to infill so we don't see any major decline for recycling outputs in 2031. Second point: in relation to design of foam in tyres and self sealing tyres – this is a perfect example of how not to handle things concerning innovation. Tyres waste management is not against innovation but it also has to be done in consultation with recyclers. We should learn from that and do these things better – involve tyre recyclers before innovations are introduced as we carry the consequences when the product is on the market.

Gavin Corporation: 1) Task 6, no reference to mass balancing process. Mass balancing is important to incorporate recycled materials into products. The limitation to mass balancing should be indicated. 2) Assumption that no changing costs to recycled materials is not realistic, e.g. tyre pyrolysis material.

French Ministry for ecological transition: are bicycles included in the scope of the study? Extrusion spikes considered for all tyres so bikes may be relevant.

--> **DH, OEKO:** Open scope at the beginning of the study. Bicycles do not have enough data, so were ultimately excluded but certain aspects could still be applied horizontally.

Task 7 – Oeko-Institut, Daniel Hinchliffe

Goals of task 7: Determine policy options based on the design options developed in Task 6; Develop a stock model for the European Tyres Industry to determine impacts from a baseline; Conduct sensitivity analyses on different parameters. The cost calculations still need to be developed.

The key assumptions behind the EU stock model and presentation of task 7 sensitivity analyses relating to electric vehicles, waste exports and other aspects were presented. In particular, a specific consideration of the impacts of retreading on budget vs retreadable tyres was modelled to simply demonstrate the benefits of a higher retreading rate. Associated market support interventions are presented, but it remains unclear whether these would be enough to support increased retreading rates and stakeholder feedback is needed here.

Some individual remanufacturing and retreading stakeholders remark that the study is helpful in making the case for retreading, but point out that C1 and C2 tyres retreading is important and should not be neglected, particularly the budget tyres make this business more and more difficult. Tyres Europe states that working groups for retreading standards of C1/C2 may be too time consuming at this time, when budget imports main issue. Working groups may support addressing the different concerns.

Comments were made relating to concerns with the quality of the policy proposals for supporting environmental aims and the broader industry: more data/evidence is necessary to back up the claims. At the moment much of the policy targets appear to be based on some incorrect assumptions.

The study team requests for supporting data and feedback to be able to address these concerns and will look into discussing with the EC how the working group ideas may be addressed.

Minutes: T7 Policy Options Stakeholder discussion

European Remanufacturing Council:

Will comment on model data in writing. Having the full supply chain here is of value to hear about the waste management problems. Similarly, some voices in the room may say that we should abandon retreading. The case made in the modelling of this Task is a reminder that retreading can help in difficult times e.g. war. You worked mainly on C3 tyres, but we should not abandon C1 and C2 – we are looking forward at a trend toward EVs and this will change the situation. There is a company in the room from France that produce 400,000 retreaded tyres each year from used C1/C2 cases. What we in particular need to hear from them – how do they select casings and what problems do they confront? Lets not give up on C1 and C2 – our children will profit from it if we do not give up. Word directed to Bruno Lagneaux.

Blackstar: study is very helpful – now is the time to change the market for C1 and C2. How we select carcasses – visual inspection, quality checks of new tyres – some budget tyres are not passing the tests; they are obliged to take the premium ones. Ecodesign is important to them otherwise their business will collapse.

→ **DH, OEKO:** for C1 and C2 we have smaller interventions in mind as market is no longer well established. Standardised casings for C3 – perhaps a standardisation request should be made to CEN/ETRTO seeing as tyres will be more robust for EVs to make a “green casing dimension”. Maybe we need another working group.

Tire Industry Research: For 40 years talking at a very high level of how the industry can move forward. 1. The last meeting we had was really good. It showed a good analysis and understanding. This meeting not so much. It's not clear if we know which proposed design options are most important. Discussed with others that one of the best thing to do for tyres is maintenance. Good maintenance would make a huge difference in many aspects of the tyre use (safety, efficiency). 2. the proposals in tasks 5-7 have not taken many feedbacks into account – the level today is lower... if the current proposal was implemented the sector would probably become less competitive, resulting in more damage to the planet and environment. Recyclers are desperate for the market to develop quickly to help them, so I have to say... something fundamentally wrong with the presented results – all stakeholders believe they could deliver better proposals. Furthermore, not enough time to consider the proposals. I dare suggest that the EC give an extension on time for providing feedback and the consultant get additional time to deliver the study.

Tyres Europe: Tyres Europe is fully aligned with need for more time to get this right and we also support an extension. The tyre manufacturing industry has consistently supported the process with data and another three months or so would be valuable.

We support the EU regulation, CE, bioeconomy etc, but want to make sure it all works together.

On retreading – we feel that the retreading sector for C1 and C2 tyres is not suffering from lack of ESPR requirements but from the budget imports. A forum to discuss standardising the carcass size is viewed with a question mark. While this could be discussed it needs to be understood that this consumes a lot of time and energy... maybe this is not the right time – it would only complicate and introduce difficulties to the sector.

Pirelli: should add the fact – each time that we place requirement on the manufacturing chain... if it is not properly... it will increase the input of materials from outside the EU. We agree to look at any target discussed to see the effect on the EU industries – metal industry, rubber, etc.

Pneuhage: we need a way to work together in a working group – we are all together at the SHM with the same target and aims but with different views. We need to talk to each other in an open way to find the best way forward. The low budget tyres in the EU – it is a global market.. this is the competition we are faced with that we need to find a solution... we need to discuss this among the interest groups and stakeholders.

➔ **DH, OEKO:** we can try to collect names and connect stakeholders to initiate a working group and we can try to develop questions for such a group based on the feedback.

Evonik: Silica is an important raw material for the performance of a tyre (e.g. RRC etc.). What about other alternatives for silica – not just bio-based but also waste like from quartz? Do not focus only on biobased materials, but please look for other materials that can be recycled. The focus is on pyrolysis – recovered CB. It will never substitute virgin CB and therefore the question is if it is really necessary to remove silica. Pyrolysis is only one route.

SMM Legal: we need more time for written comments. Generally, the study shows advantages of pyrolysis but undermines advantages of mechanical engineering like use for asphalt. If the target is to close the loop in the economy, this is also a potential important aspect. The use of ELTs in this sector will help close the gap in the loop.

ECOS: Question, looking at the comparison of retreads versus budget tyres. Have not read task 7 yet. Did this model look at how EURO 7 abrasion requirements would affect the market of tyres? If they would remove some budget tyres?

➔ **DH, OEKO:** at the moment the model is very basic. Limited in the scope of what can be included. Normally we would not extend it so much as has been done for retreads but we could in theory also cover abrasion.

Tyres Europe: we have some data and we are happy to share as to how EURO 7 could impact.

➔ **DH, OEKO:** In terms of longer timeframes, we need to discuss it with the team to what extent we can provide more commenting windows. In our defence, we sent out these design options in March, and we didn't get much feedback. Please provide your feedback in the next 4 weeks.

Digital product passport (DPP) - Oeko-Institut, Yifaat Baron

Yifaat Baron presented the various aspects concerning the Digital Product Passport which is included in both the task 6 and task 7 reports.

Stakeholders see potential in the DPP and the availability of information that it shall enable, however it was warned that some form of harmonisation needs to be considered so that each waste site uses a compatible RFID system. Retreaders raised their need to be able to report to the DPP and questioned how the DPP could allow them to show the competition advantage of retreaded tyres.

A stakeholder questioned what type of data suppliers would need to provide and was referred to the descriptions in the reports.

The use of RFID was raised. It seems that there are different views among stakeholders, and some voiced a need that the regulation describe the data carrier in a technology neutral way, referring to what characteristics it must have rather than referring to the data carrier type itself. While some refer to the need of RFID to ensure that the data carrier is robust enough, having an identifier on the tyre (visible to the user) was also mentioned as necessary. Whereas the DPP report refers to a secondary data carrier to ensure access of consumers to relevant information, it was mentioned that Rain RFID should be accessible by smartphones in 2027.

A few stakeholders voiced their opinions that EPREL is not sufficient for the case of tyres and should be phased out, allowing transition time between EPREL and DPP. In this respect, it was also said that double reporting should be avoided.

Looking at the timeframe for information requirements on SoCs, it was questioned if this were feasible considering the time necessary to develop a DPP. The consultant explained that timeframes have been harmonised with other product groups and that this aspect needs discussion with the EC.

A few stakeholders mentioned that the use cases proposed seem quite comprehensive, but state that they would provide written feedback.

Minutes: DPP Stakeholder discussion

RAIN Alliance: RAIN RFID is accepted as a data carrier by EN20020 standards. RAIN alliance welcomes proposal to use RAIN RFID in tyres. Especially think can provide use phase support. In 2027 will be possible to do with smartphones which could support uptake at waste management operators.

Tyres Europe: On the proposal to use an RFID, legislation should focus on describing the desired outcomes rather than identifying the solutions. Focus on prescribed outcomes, rather than picking a specific technology. It should remain technology neutral. They will provide further feedback.

Genan Recycling A/S: From a recycler's perspective, they see a lot of potential in DPPs. We should look into how the DPP affects the recycling sites, for example if each recycler has their own RFID system it would be a nightmare. They propose making a harmonised solution that can be used by all importers/manufactures of tyres.

4JET Technologies GmbH: Regarding the data carrier: an identifier should be present on the tyre (visible to the user). Labels could be more effective for consumers. Would suggest a technology neutral approach.

Michelin: The proposed use cases are relevant. Comments on technical architecture: understand why would have it as consumer approach, but must demonstrate the benefit before demanding everywhere. Consider EPREL is not sufficient for the use cases, would duplicate and not cover item level tracking. EPREL should be phased out, but allowing transition time between EPREL and DPP. The CIRPASS project already enables showing some of the benefit of having certain information accessible to certain actors.

ExxonMobil: What kind of data reporting requirement and burden would fall on suppliers? Normal to declare GHG and PEF. Would like to have clarity on whether we would be asked to give all the data. Took 10 full time employees to generate carbon footprint data over 3 years.

→ **YB, OEKO:** we need to specify it in further analysis.

Tyres Europe: also emphasises the need to avoid doing double reporting with EPREL and DPP. Mentions the reference in the task 7 report to SoC requirements and their timeframe (page 18 of T7) - how shall this apply to DPP implementation plan? How shall the data be made available if the DPP is not running yet? Concern about the other data platforms mentioned: should not necessarily be interoperable with other platforms if not necessary.

PEW Trust: If an abrasion classification is entered, the lowest class should align with euro 7 regulations and should be available to public not only market surveillance

Pneuhage Reifenerneuerungstechnik GmbH: As a retreader we are not recognised as a manufacturer; but we have the same legal obligation as a new tyre manufacturer. We are requested to update the DPP, we can read the casing, we need to invest a lot of money to do it. If the DPP is applied, it is not clear how we can show our competitive advantage in the competition for customers.

DOW: Try to leverage existing databases in terms of data, try to leverage the passport as a way to communicate information – do not jump into bans. See if it can really help improve circularity. Enforcement – maybe out of scope legally – critical to the success of implementation.

→ **YB, OEKO:** On the SoCs, for each datapoint we have specified who should provide the info and who is the receiver. If you can have a look at that it will be very helpful.

Tyres Europe: We received the T7 report containing these elements on DPP late. We will provide the feedback required once we have the time to read the report.

French Ministry for ecological transition: We know why we should use the DPP, we see no future without it. DPP is the only way to share information to retreaders and recyclers.

Closing words and outlook – Oeko-Institut, Yifaat Baron

Next steps were presented together with project planning.

The deadline for stakeholder feedback is 8 July 2026. Stakeholders were asked to focus on constructive feedback and not just objections.

Stakeholders asked to have a further opportunity to comment on the report once it is revised and complete (tasks 1-7).

The possibility of having working groups was discussed again and some stakeholders stated their interest. It was asked to keep civil society informed or to allow their participation in the group (i.e., relevant NGOs).

Minutes: Closing

Recycling Europe: Once you have the finalised draft, we would propose providing feedback before publication.

--> **DH, OEKO:** We will discuss internally and reply.

ECOS: Asked that should a proposed idea for a working groups initiative be taken forward that civil society has a chance to participate or at least that the documentation of outcomes would be transparent. Proposed to publish comments by stakeholders and replies (as performed in other ESPR projects).

Tyres Industry Research: Plenty of good ideas from 1-1 conversations.

ExxonMobil: Who has the lead to gather all of the comments? What are the next steps for a working group?

--> **YB, OEKO:** We will probably leave it to you; we will discuss with the Commission and inform the stakeholders.