



SWaMP2008

Southern Waste Management Partnership

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Committee Clerk,
Committee for the Environment,
Room 245,
Parliament Buildings,
Ballymiscaw,
Stormont,
Belfast
BT4 3XX

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16th September 2011

Dear Sir/Madam,

**RE: EVIDENCE FOR THE COMMITTEE FOR THE ENVIRONMENT'S
INQUIRY INTO USED TYRE DISPOSAL**

1. INTRODUCTION

- 1.1** This response has been prepared on behalf of the eight constituent councils of the Southern Waste Management Partnership (SWaMP2008) listed below; following your call for evidence on the Inquiry into Used Tyre Disposal in Northern Ireland.

Armagh City & District Council
Banbridge District Council
Cookstown District Council
Craigavon Borough Council
Dungannon & South Tyrone Borough Council
Fermanagh District Council
Newry & Mourne District Council
Omagh District Council

Individual member councils within SWaMP2008 may also make their own separate responses.

- 1.2** SWaMP2008 welcomes the opportunity to provide evidence to the Committee for the Environment's Inquiry into used tyre disposal in Northern Ireland.
- 1.3** More specific comments relating to the full range of issues highlighted for consideration are detailed in 2, below:

2. ISSUES FOR CONSIDERATION

2.1 Estimate the number of used tyres arising annually in Northern Ireland

The following table shows the number of different types of tyres collected and recycled by constituent Councils of SWaMP2008 from 01/06/04 – 30/06/09

Description	Armagh	Banbridge	Cookstown	Craigavon	Dungannon	Fermanagh	Newry	Omagh	SWaMP2008
17.5" Truck	18	97	175	130		144	296	7	867
19.5" Truck	14	15	1	39		20	25	2	116
22.5" Truck	163	113	60	729		221	666	43	1995
385/65 Truck	82	17	11	25		53	202	10	400
Car	1247	10713	20347	1680	120	5283	19099	178	58667
Earthmover	2					3	2	3	10
Forklift		6		4		5	1		16
Forklift Solid							13		17
Rim removal – car	23	202		374	3	465	2329	6	5224
Tractor – Large	16	59		7		114	113	5	314
Tractor – Small	3	13		1		5	23		45
Rim removal – truck	6	4		3		22	44	3	82
Tubes		13					51		217

The overall cost of treating these tyres from 01/06/04 – 30/06/09 was £88,527 and cost SWaMP2008 constituent Councils £33,174 in 2009.

2.2 Compare the NI approach to managing used tyres with other approaches e.g. Producer Responsibility, Tax system etc.

As all used tyres are now retained by tyre suppliers, and the cost of casings disposal passed on to the motorist, very few tyres are now brought to Council facilities, as a result of this, however as the table above highlights the majority of tyres sent for recycling are as a result of flytipping incidents.

SWaMP2008 previously requested that the Department introduce producer responsibility for tyres under Article 8 of the revised Waste Framework Directive (Directive 2008/98/EC)

The industry should be given the overall responsibility for managing tyres that are flytipped or dumped illegally. This would reduce the need for public bodies to pay for their management and could make more resources available for additional recycling initiatives.

2.3 Establish the extent of historical stockpiles of used tyres in NI and consider how these could be incorporated into the established process for managing used tyres

There may be a case in rural areas that quantities of disused tyres still exist, mainly due to agricultural activities, such as the use of tyres to seal silage pits etc. With more and more farmers using round silage bale methods for the collection of grass, the need for these tyres no longer exist. Therefore, there may be cases where illegal disposal of tyres will continue, if some agreement is not made between the producers and the UFU.

2.4 Examine the legal framework for the collection, storage and disposal of used tyres and consider how this is monitored and enforced by the Northern Ireland Environment Agency

SWaMP2008 is concerned as to the NEA's ability to check the validity of WML for tyre repressors in Northern Ireland, NIEA do not provide a public register of suspension notices of firm which are in breach of their WML, SWaMP2008 propose to request that this is provided by the NIEA in the future in a timely manner and that information is published in the same way as the licence register. However both these registers need to be kept up-to-date and published at least on a weekly basis in order to ensure that Councils are not sending used tyres to unlicensed repressor.

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If we can be of any further assistance please do not hesitate to contact us.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'G Byrne', followed by a small horizontal line.

Graham Byrne, Chief Officer, SWaMP2008