



Retreading in Europe

Tim van der Rijken – Secretary General of BIPAVER



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- The general situation of retreading in Europe
- Socio-economic impact
- Market developments
- Anti-dumping investigation
- Regulatory developments
- National support mechanisms



The general situation



Retreading of *Passenger and Light Truck Tyres*:

- over the last 15 years this segment lost gradually its importance
- today the overall market share in Europe is << 1% of the aftermarket (but with differences in the individual markets)
- no new tyre manufacturer is today active in that segment
- reasons: decreasing price level of budget imports, high diversity in tyre dimensions and designs, new regulations

Retreading of *Tyres for Commercial Vehicles (mainly truck and bus)*:

- important for premium new tyre manufacturers, especially in mileage/leasing contracts
- large number of independent retreaders (often SME)
- high concentration rate over last decades (industry and independent)
- fierce competition from budget, often not retreadable new tyres
- growing challenges due to new regulations (Tyre label, 3PMSF, R109)



The socio-economic impact*



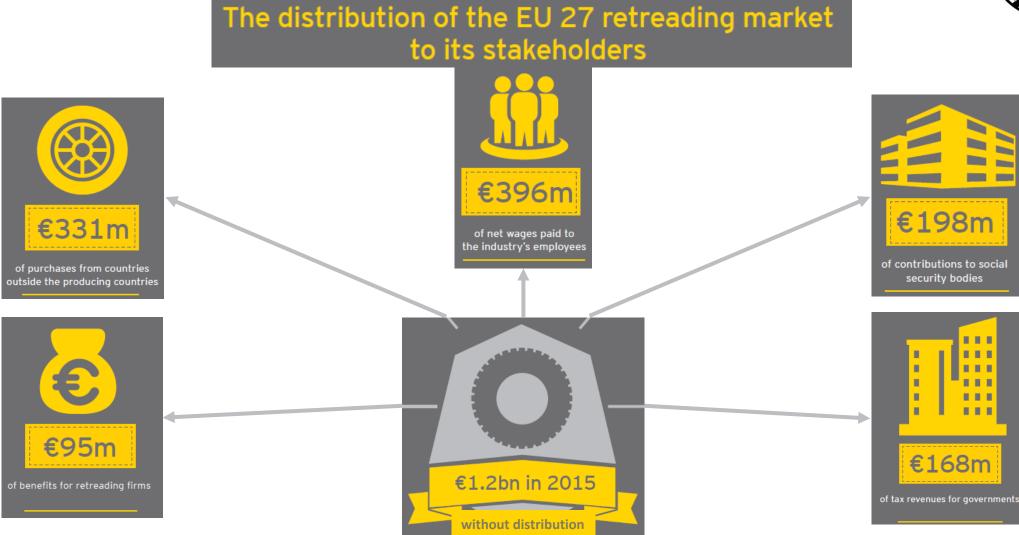


^{*} source: The socio-economic impact of truck tyre retreading in Europe by EY; October 2016



Economic impact



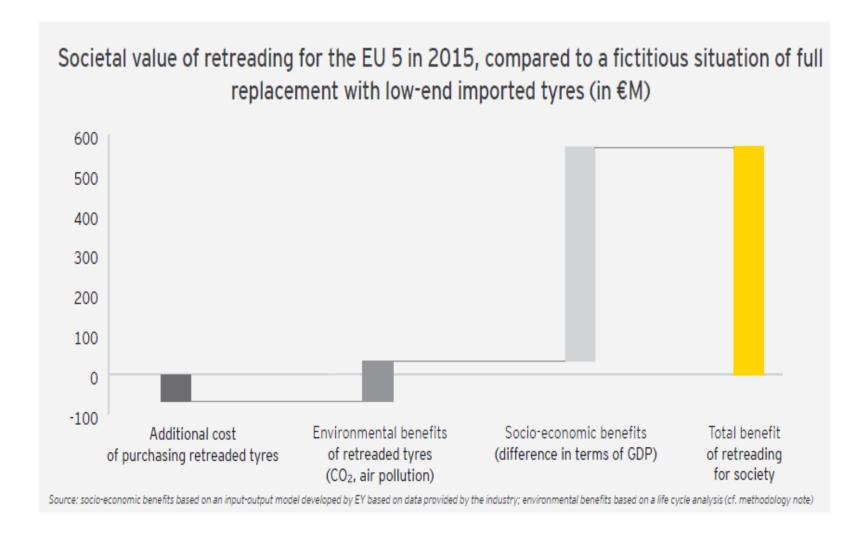


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Economic impact



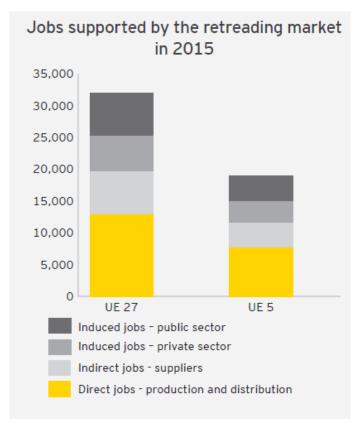


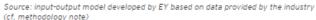
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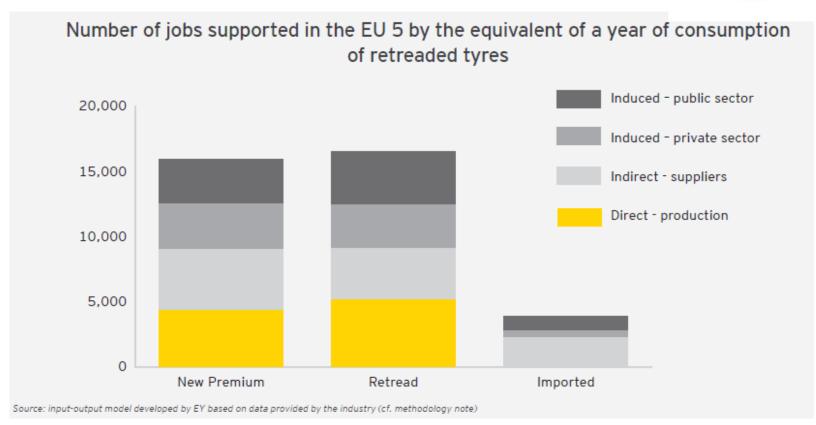


Social impact









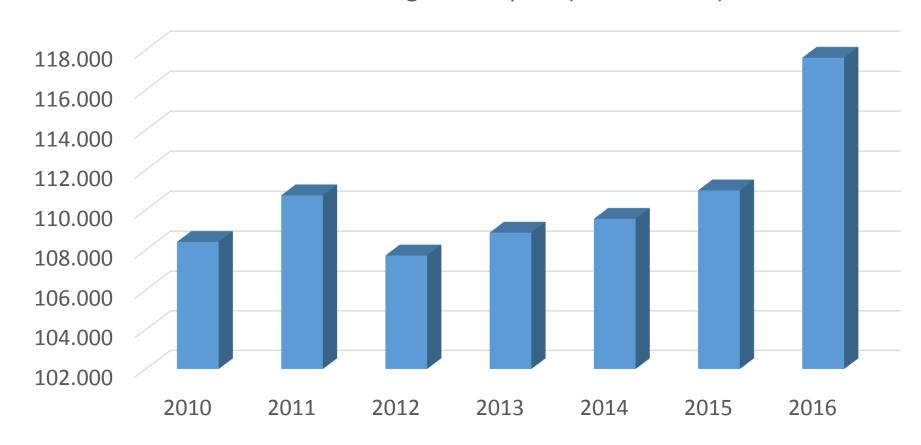
^{*} source: The socio-economic impact of truck tyre retreading in Europe by EY; October 2016



Market volume EU27



Annual road freight transport (Mio Veh-km)



^{*} source: Eurostat



Market volume EU27





^{*} Index: 2010 = 100. Blue = commercial tyre sales , red = road freight transport km's



The EU commercial tyre market

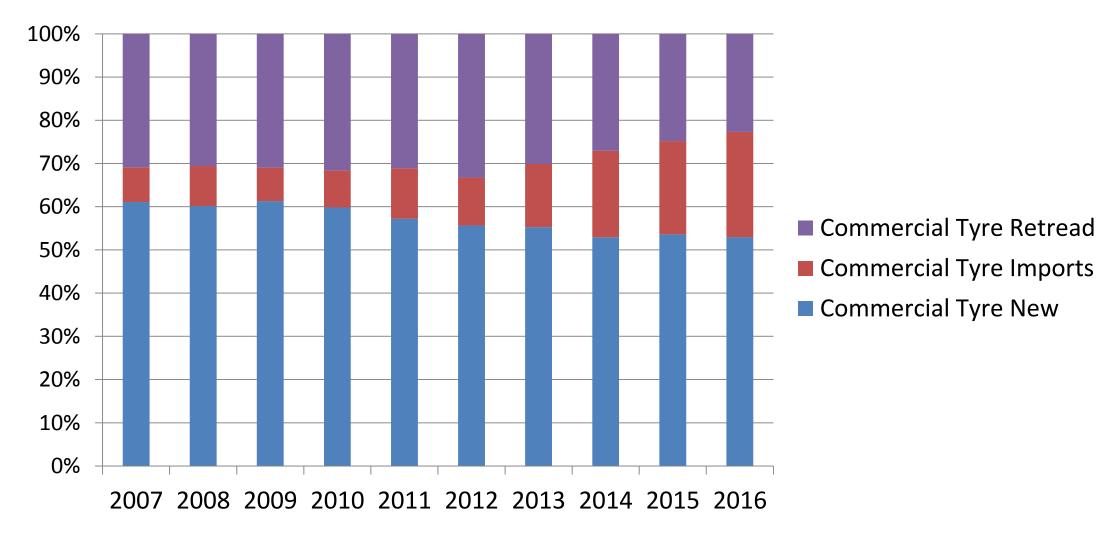


European Comr	mercial Tyre Mark	et			
1.000 Units	Commercial Tyre New	Commercial Tyre Imports	Commercial Tyre Total	Commercial Tyre Retread	Totals
2007	11.453	1.503	12.956	5.796	18.752
2008	10.050	1.550	11.600	5.114	16.714
2009	8.895	1.119	10.014	4.495	14.509
2010	10.411	1.494	11.905	5.499	17.404
2011	10.172	2.081	12.253	5.532	17.785
2012	8.225	1.643	9.868	4.920	14.788
2013	8.830	2.343	11.173	4.811	15.984
2014	9.180	3.470	12.650	4.700	17.350
2015	9.522	3.839	13.361	4.408	17.769
2016	9.626	4.423	14.049	4.124	18.173
Source: EUROSTAT		Commercial Tyre New = Manufactured in Europe			
		Commercial Tyre Imports = Manufactured in China			



The EU commercial tyre market







Reported closures of retreaders per country since 2014



Country		Country	
D	13	DK	1
UK	3	HR	2
Α	2	HU	4
F	3	BG	4
SE	4	RO	5
FIN	4	IT	13
PT	5	CZ	3
ES	9	Total	75

Appr. 20% of the independent retreaders closed within 3 years.



Anti-dumping and anti-subsidy



Anti-dumping procedure

- Complaint launched 30-7-2017
- Supported by >45% of new and retreaded truck and bus tyre manufacturers in Europe
- Investigation started 11-8-2017
- Sampling of:
 - 11 EU producers (new and retread)
 - 4 exporting producers in PRC
- Brazil selected as analogue country
- Registration regulation per 3-2-2018
- Provisional measures per 8-5-2018
- Definitive measures latest per 10-11-2018

Anti-subsidy procedure

- Investigation started 14-10-2017
- No provisional measures





Product scope and segmentation



- Bus and lorry (= truck) tyres, load index >121
- New and retreaded
- Segmentation into 3 tiers, based on price, retreadability, use for OE, mileage, marketing and after sales service:
 - 1. Premium new, designed for multi-life
 - 2. Non-premium, new and retreaded
 - 3. Budget, new and retreaded (independent)

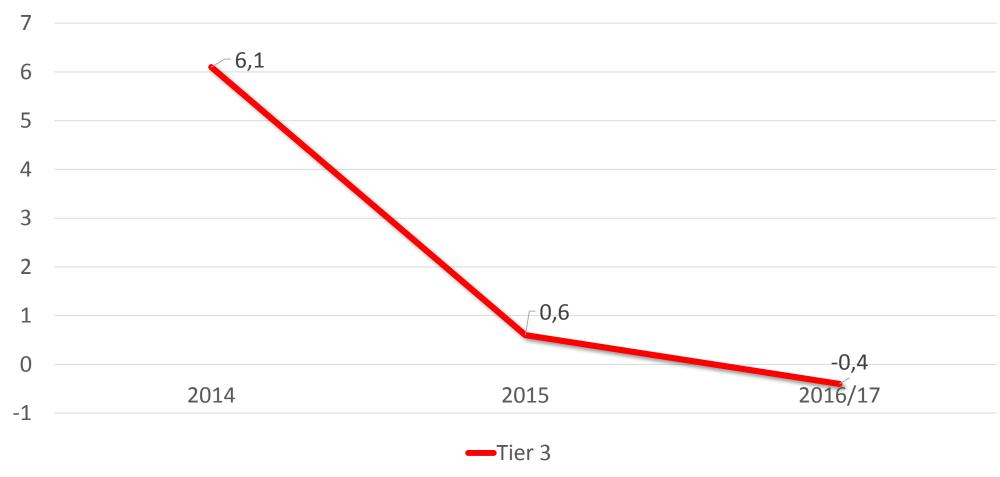




Profitability of sales in EU



Profitability per tier (% of sales turnover)



^{*} source: European Commission



Conclusions of the EC



- "...the Union industry as a whole has been under intensive pressure." (208)
- "Market share was gained by imports [] at the expense of the Union industry, irrespective of segmentation, resulting in over 4 200 jobs lost."
- "The negative development was most felt in the tier 3 where many SMEs retreaders exited the market and could not benefit from the economic recovery in the sector, which was ultimately captured by the low-priced imports." (209)
- "The losses of tier 3 are not sustainable and put the survival of the entire retreading activity in the Union at risk."



Provisional measures



- Provisional, fixed duties ranging from € 52,85 € 82,17 per tyre
- Dutie differs per manufacturing company, regardless of segment/tier, brand or product type/size
- Introduction of seperate codes for import of tyre fitted wheels
- Continuation of registration
- Retroactivity undecided



Regulatory developments



- Labelling for retreads
- 3PMSF (snowflake) testing/marking for retreads







Labelling for retreads



- On 17-5-2018 the EC proposed amendment of Regulation 1222/2009 (tyre labelling)
- Allows inclusion of retreaded tyres, once an appropriate test standard is finalized
- Working Group of BIPAVER/ETRMA/ETRTO still working on this
- Rolling resistance is most difficult to determine



3PMSF-marking for retreads



- Update of R109 has passed GRRF in February:
 - more details about application for R109 extension
 - document management and COP/responsibilities
- Supplement of R108 has also passed GRRF
 - until supplement of R108 is ratified, there is no legal base to test/mark passenger retreads, but national winter tyre regulations demanding 3PMSF are already in place



National support mechanisms



Italy:

- Law of December 21st 2001 n. 448 (clause 52, subsection 14): all public institutions in Italy have to reach a quote > 20% with retreads of their tyre purchases (car, LT, TBR)
- the Italian association AIRP is actually trying to achieve a tax relief for retreads to support their use in private fleets but the approval is still outstanding

Germany:

- Funding program "De-minimis" of BAG (Federal Office for Freight Transport) for German Hauliers with vehicles > 7.5 t, registered in Germany for various safety, ecology or efficiency improving measures (varying every year)
- Funding limited to 2.000 €/Veh. and 33.000 €/company-
- Scheme for retreads (in 2017): 40% of net purchasing cost, max. 80% of net cost if retread has "M+S" on not driven axles or "3PMSF" marking on all axles



Other support mechanisms



The Netherlands

 Since March 2017 retreading is part of the guidelines for public procurement of transport services

Finland:

- Financial benefits on recycling costs:
 7.65 € for new TBR tyres (net)
 4.60 € for retreads incl. casing
 0 € for customer own casing retreads
- All public institutions normally quote for retreads, but no general rules apply

Other mechanisms? Please report them to BIPAVER!





Thank you for your attention!