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PETITION TO THE EU PARLIAMENT FOR THE ROAD TIRES AND TUBES DEPOSITS

Summary

This petition requests that the European Parliament introduce a harmonized deposit-return scheme for road tires and inner tubes across the European Union to prevent improper disposal, reduce environmental pollution, protect consumers, and create predictable responsibilities and fair competition for manufacturers and retailers.

Purpose and scope

- ✓ **Objective:** Prevent illegal dumping and burning of tires, reduce microplastic and toxic emissions, conserve resources, and ensure transparent costs and incentives for reuse, recycling, and safe disposal.
- ✓ **Products covered:** All new rubber tires and rubber inner tubes placed on the EU market for road vehicles, regardless of wheel count, vehicle size, drive type, or intended use.
- ✓ **Transitional rule:** Vehicles already in circulation are not required to replace existing non-deposit tires until replacement is necessary according to technical inspection standards.

Deposit requirement and return channels



1. All new tires sold in the European Union should be protected from improper disposal by collecting a deposit, which ensures the proper return of the used tire to the manufacturer through:

- a) Returning tires to the place of purchase of the new vehicle with new tires.
- b) Returning tires to the Tire Dealerships authorized by tire manufacturers.
- c) Returning tires to the Tire Repair Shops authorized by tire manufacturers that repair or install brand-name tires purchased in-store or online from businesses that do not offer tire installation services.

Deposit calculation and composition

2. All vehicles already in circulation without deposit tires should not be required to replace their tires with deposit tires until a technical inspection determines the need to replace the tires with new tires, which should have a special **"Return for Deposit"** marking embossed on the tires and included on the tire sales document, allowing the installation of non-deposit tires within their private or commercial availability. The tire deposit value should be calculated based on the total weight of the tire, consisting of:

- a) Whole tire **rubber**,
- b) Whole tire **metal carcass**.

3. These weights should be determined by the manufacturer for each tire sold. The tire deposit value should reflect:

- a) **The value of** the raw rubber contained in the whole tire,
- b) **The cost of** environmental pollution from carbon monoxide and other harmful chemicals contained in rubber, which are released into the atmosphere and the natural environment due to improper disposal or illegal burning.

Tire Recovery Fund and surplus allocation

4. The deposit for each rubber tire should exceed 110% of the calculated environmental pollution costs and the value of the rubber, to enable the gradual recovery of all new and non-deposit tires through the establishment of a tire recovery fund with a 10% budget derived from established tire deposits.



Producer obligations and extended producer responsibility

5. Manufacturers of branded tires should be obliged to accept all their produced tires and an additional 10% of tires accepted by authorized sales points and tire replacements of unknown origin, which are accepted under the "**Tire Recovery Fund**", which were recovered from abandoned tire sites or were accepted as part of the sale of new tires, which allows the old used non-deposit tires to be left at the place of installation of new tires.

6. The deposit collected as part of the sale of new tires, added to the selling price of the tires by sellers, should be transferred to an escrow account designated by the European Union and individual Member States. Tire buyers should receive notification via text message or email that the deposit has been paid on their behalf by the tire seller within 7 days of the tire sale.

Retailer and collection-point rules

7. Tire manufacturers who accept used tires for deposit for proper recycling and disposal will be obligated to cover all recycling and disposal costs by incorporating the appropriate recycling and disposal costs of the returned tires into the price of the tires sold, enabling the proper recycling and disposal process.

8. Tire manufacturers who accept used tires for non-deposit for proper recycling and disposal under the "Tire Recovery Fund" will be obligated to cover the costs of recycling and recycling non-deposit tires by adding an appropriate security deposit to the price of the sold tires for the recycling and disposal of such tires until such time as there is a general shortage of such tires.

Documentation, consumer rights, and transparency

9. Authorized tire sales outlets will be authorized to accept non-deposit tires at a rate of 10% of the number of deposit tires sold. Authorized outlets that collect deposit fees are obligated to pay those returning non-deposit tires the same amount for the rubber and carcass if the manufacturer's information on the outer walls of the tires allows the tire to be located in the system to determine the deposit value, or 50% if the tire is torn and returned in parts.



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99 10. Non-deposit and deposit tires should be returned to their manufacturers to obtain a document
100 confirming the tire's transfer, which allows the depositing company to pay the refunded amounts from the
101 "Tire Recovery Fund," which imposes recycling and proper disposal obligations on the tire manufacturer,
102 who accepts non-deposit tires from an authorized point that collects and refunds deposits for deposit and
103 non-deposit tires at a rate no greater than 10% of the amount of own-brand tires submitted for disposal.

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Implementation and governance

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107 11. For the proper functioning of the deposit collection and refund system for deposit and non-deposit
108 tires, the European Union should establish an appropriate institution, administered by Member States
109 designated by Parliament. These Member States, together with manufacturers, will establish the details of
110 the system, operating identically in each Member State that would regulate:

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- 112 ✓ **Common standards:** The EU should mandate uniform operational rules, minimum performance
113 targets, and inspection protocols applied identically in each Member State.
- 114 ✓ **Sanctions:** Member States must adopt proportionate penalties for noncompliance by
115 manufacturers, retailers, and unauthorized collectors, including fines and temporary market
116 restrictions.
- 117 ✓ **Audits and public reporting:** An independent auditor must publish annual, public performance
118 reports on collection rates, recycling outcomes, Fund balances, and environmental benefits.
- 119 ✓ **Timeline and milestones:** Immediate adoption of design and data requirements; phased rollout of
120 deposit on new sales within a defined window; parallel legacy tire collection programs funded by
121 the Tire Recovery Fund.
- 122 ✓ **Metrics for success:** Annual recovery rate targets, reduction in illegal disposal incidents,
123 measured reductions in open burning and associated emissions, and increases in quality
124 secondary-material feedstock for circular manufacturing.

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126 12. The list of rubber tire products for which the deposit obligation should be implemented should
127 include all sizes of rubber tires and rubber inner tubes, regardless of the number of wheels on the vehicle,
128 the vehicle size, the drive type, and the vehicle's intended use.

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Benefits for environment, consumers, and producers



- ✓ **Environmental benefits:** Dramatic reduction in illegal dumping and tire burning, lower emissions of toxic gases and microplastics, conservation of rubber and metal resources, and safer land and water ecosystems.
- ✓ **Consumer benefits:** Clear price transparency, predictable refunds, easier and safer disposal routes, and reduced local pollution in communities.
- ✓ **Producer benefits:** Secure supply of secondary raw materials, predictable cost recovery for end-of-life management, improved brand accountability, reduction of reputational risk, and a level playing field across the EU market.

Closing statement and signature

13. With the respect to the natural environment, I respectfully request the European Parliament to adopt a harmonized deposit-return and recovery framework for tires and inner tubes consistent with the provisions above to secure environmental protection, consumer rights, and fair producer responsibility across the European Union.

K Pawlak

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Founder and Board President of
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