29th of April 2011

Comments by Genan to the Draft Revised Technical Guidelines from 28 February 2011 on the environmentally sound management of used tyres

Genan appreciates and fully supports the initiative taken by the Basel Convention Secretariat and the Brazilian Chairmanship to elaborate ESM guidelines for used tyres. We acknowledge the very comprehensive work that has been carried out by Brazil and members of the Intersessional Working Group and we are pleased to submit the following comments:

Genan acknowledges the improvement of the text on a number of issues compared to the earlier version of the Draft. Especially, Genan welcomes the final text on the definition of tyre recycling.

Waste hierarchy (paragraph 81)

We welcome the text and figure on the waste tyre management hierarchy (paragraph 81). It is important that the waste hierarchy is described in a precise and clear manner. Therefore, Genan suggests replacing the figure with the figure below, which more clearly explains the waste hierarchy for scrap tyres.

Road application (paragraphs 178 to 185)

Concerning “Road application” Genan has one major comment: The section on “Road application” (paragraphs 178 to 185) has been moved in the latest version from (e) “Industrial and Consumer products” to (d) “Civil Engineering”.
The use of recycled rubber powder for modification of asphalt and bitumen in road construction is a highly sophisticated technology with a large potential. It is important to underline that the rubber powder acts as a modifier like virgin rubbers (e.g. Styrene-butadiene-styrene) and in no way as a filling material. It is our viewpoint that “Road application” is misplaced in the section together with “Civil Engineering” applications which mainly cover backfilling operations. Genan strongly recommends that the section “Road application” is moved back to section (e) “Industrial and Consumer products”. This also corresponds with the fact that bitumen modification for road application is mentioned in the introduction (paragraph 186) to section (e) “Industrial and Consumer products”.

Tyre to tyre recycling (paragraph 66)

Finally, Genan proposes an additional sentence in paragraph 66 taking into account the latest developments in tyre to tyre recycling.

At the end of paragraph 66 the following sentence should be inserted:

“However, research activities by a leading tyre manufacturer and a large recycling company in Europe are conducted with the aim to substitute at least 10 % of the natural rubber used in new tyres with recycled rubber from tyres.”

Yours Sincerely
GENAN

Director of Business Development