

# Tyre Regulations for the

# **MOTOR TRADE**



## Are tyres part of your business?



If you handle tyres as part of your motor business you may need to join the Repak ELT tyre compliance scheme.

Call 01 4618 600 or email [info@repakelt.ie](mailto:info@repakelt.ie) to discuss your obligations.



## REPORTING OBLIGATIONS

If your business carries out **one** or **more** of the following activities you have reporting obligations:

- 1 Import vehicles - new or second-hand
- 2 Import tyres - new or second-hand
- 3 Sell tyres
- 4 Invoice a customer for tyres
- 5 Take back waste tyres



# FAQ for

# MOTOR TRADE



**Question:** Will motor dealerships who only sell new vehicles purchased from Irish-based Producers/Importers of new vehicles (For example BMW Automotive (Ireland) Ltd, Toyota Ireland Unlimited Company, Mazda Motor Ireland, Volkswagen Group Ireland Ltd., etc) have to register with Repak ELT?

**Answer:** No, the motor dealership will not have to become a member of Repak ELT as these tyres should already have been reported to Producer Register Limited(PRL) by the Producer/Importer.

**Question:** Will motor dealerships who sell second hand imported vehicles from outside the Republic of Ireland (used car imports) have to register with Repak ELT?

**Answer:** Yes, there is a requirement for them to become a member of Repak ELT as they are placing the tyres on the market for the first time. Furthermore, the dealership is not only considered a Retailer but also a producer and would also be required to register with PRL.

**Question:** Will motor dealerships who sell second-hand Irish vehicles have to become a member of Repak ELT?

**Answer:** No, there is no requirement for them to register provided they are only selling second-hand Irish vehicles.

**Question:** If a motor dealership services vehicles, but outsources the fitting of tyres with a tyre fitting garage, are they obligated to become a member of Repak ELT?

**Answer:** If the dealership charges for the service and charges for tyres as a separate line item on their invoice, then the dealership must become a member of Repak ELT. If however the customer is invoiced separately by the tyre fitting garage, the dealership would not be required to become a member of Repak ELT.

**Question:** What are the obligations for tyre retailers and/or motor dealerships who sell part worn tyres?

**Answer:** The tyre retailer and motor dealership (if importing and selling part worn tyres) would have to become a member of Repak ELT and register with PRL as they are placing the tyres on the market for the first time.

**Question:** If a customer goes into a tyre retailer and/or dealership and removes partly worn tyres from his/her vehicle and wants to replace them with new tyres, can the tyre retailer or dealership resell the tyres?

**Answer:** No, the tyre retailer or dealership cannot resell the tyres as part worn tyres. Once a tyre is discarded at retail level it is a waste regardless of the condition of the tyre.

**Question:** If a motor dealer buys new tyres from a tyre retailer for their Irish second-hand car before selling it to a customer (and the tyre retailer retains the waste tyres) do they need to be a Repak ELT member?

**Answer:** No, because the tyre retailer retains the waste arising from the motor dealership i.e. tyres are being fitted onto cars rather than being supplied onwards, so the motor dealer is not deemed the retailer.