Consultation on a new Resource Framework for Tyre Pyrolysis Oil

Consultation document

May 2025

We are the Environment Agency. We protect and improve the environment.

We help people and wildlife adapt to climate change and reduce its impacts, including flooding, drought, sea level rise and coastal erosion.

We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people's lives and contributes to economic growth.

We can’t do this alone. We work as part of the Defra group (Department for Environment, Food & Rural Affairs), with the rest of government, local councils, businesses, civil society groups and local communities to create a better place for people and wildlife.

Published by:

Environment Agency
Horizon House, Deanery Road,
Bristol BS1 5AH

www.gov.uk/environment-agency

© Environment Agency 2025

All rights reserved. This document may be reproduced with prior permission of the Environment Agency.

Further copies of this report are available from our publications catalogue: www.gov.uk/government/publications or our National Customer Contact Centre: 03708 506 506

Email: enquiries@environment-agency.gov.uk

Contents

Introduction....4

About this consultation....4

Responding to this consultation....5

The consultation....6

Would you like to find out more about us or your environment?....12

incident hotline....12

floodline....12

Environment first....12

Introduction

A Resource Framework (previously known as Quality Protocols) sets out end of waste criteria for the production and use of a product from a specific waste type. Compliance with these criteria is considered sufficient to ensure that the fully recovered product may be used without undermining the effectiveness of the Waste Framework Directive and therefore without the need for waste management controls.

In addition, a Resource Framework indicates how compliance may be demonstrated and points to good practice for the use of the fully recovered product. A Resource Framework further aims to provide increased market confidence in the quality of products made from waste, reduce waste and support the circular economy.

There are currently 13 published Quality Protocols setting out end of waste positions for a number of different materials. These are currently under review and can be found within the **Guidance for the Waste quality protocols review** which is published on GOV.UK. During the review process a number of industry bodies approached us to ask about the potential for new end of waste frameworks to cover new waste streams. This resulted in us offering industry the ability to apply for new frameworks and you can find out how to do so by using the **Guidance to Request a resource framework to show when a material has ceased to be waste** which is published on GOV.UK..

The first submission from industry came from the Renewable Transport Fuel Association for a new framework to produce tyre pyrolysis oil as a feedstock to fuel production.

About this consultation

The consultation is about the draft Resource Framework for Tyre Pyrolysis Oil document.

We are interested to hear your thoughts on the proposed new resource framework and the approach that has been taken to help inform our decision. We are also looking for your confirmation (or otherwise) of the specific requirements of the framework.

The background information you need to complete this consultation is included in our consultation document. We refer you to specific sections for each question.

You can view the consultation document, questions and all supporting documents below on our online consultation tool, Citizen Space:

- Draft Resource Framework for Tyre Pyrolysis Oil
- Request a resource framework to show when a material has ceased to be waste
- Quality protocols and resources frameworks: rules for all end of waste frameworks

What we are consulting on

We have been working with the Renewable Transport Fuel Association, their members, and a number of end users to produce the new Resource Framework for Tyre Pyrolysis Oil via a Technical Advisory Group (TAG) process. The TAG membership is necessarily small to ensure progress can be made. Now that the TAG process has finished and the draft Resource Framework produced, we would like your views, specifically, on whether the requirements of end of waste have been met.

What we are not consulting on

We are not consulting on the principles of the end of waste test which remain unchanged.

Responding to this consultation

This consultation will run for 6 weeks from 6th of June until 11:59pm on 18th of July.

Please refer to specified sections of the consultation document for full details of each proposal. Where relevant, use free text boxes to provide additional information explaining your answer.

Respond online

You can view the consultation and supporting documents on Citizen Space, which is the Environment Agency's consultation website.

The consultation will close on 18th of July 2025. We will consider all responses received by this date before finalising the new Resource Framework for Tyre Pyrolysis Oil.

Please submit your response on Citizen Space, as this provides an easy and efficient way to respond. It will also help us to:

- gather all responses in one place
- summarise responses quickly and accurately
- reduce the cost of the consultation

Respond by email

If you prefer, you can submit your response by email using the response form, which you will find under the 'Related' section of the consultation on Citizen Space. Please email your response form with the subject header of "TPO Resource Framework Consultation" to ResourcesFrameworks@environment-agency.gov.uk.

Ask for a printed version of the consultation document

- Please contact us if you need a copy of the consultation document sent to you. You can do this by contacting our general enquiries helpdesk, the National Customer Contact Centre: email: enquiries@environment-agency.gov.uk
- telephone: 03708 506 506
- Minicom for the hard of hearing: 03702 422 549
- Monday to Friday, 8am to 6pm

If you use assistive technology (such as a screen reader) and need a version of this document in a more accessible format, please email enquiries@environment-agency.gov.uk. Please tell us what format you need. It will help us if you say what assistive technology you use.

Consultation principles

We're running this consultation in accordance with the guidance set out in the government's Consultation Principles.

If you believe the consultation has not been run in accordance with these principles, please email consultation.enquiries@environment-agency.gov.uk.
Otherwise, for all other queries relating to this consultation please email: enquiries@environment-agency.gov.uk

The consultation

How we will use your information

We will make all responses publicly available after the consultation has closed, unless you have specifically requested we keep your response confidential.

We will not publish names of individuals who respond.

After the consultation has closed, we will summarise responses in a consultation response document and make this publicly available on GOV.UK. We may include comments or quotes, unless you specifically request that we keep your response confidential.

We will not publish names of individuals or personal data, but we will publish the name of the organisation for those responses made on behalf of organisations.

We will not respond individually to responses. If you have asked to be notified, we will contact you to let you know when the consultation response document is published.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

We would like to keep you informed about the outcomes of this consultation.

If you would like to receive emails acknowledging your response and or telling you when we have published the summary of responses, please select from:

- **yes**, I would like to receive an email acknowledging my response
- **yes**, I would like to receive an email to let me know the consultation response document is published

If you have selected any of the above, please tell us your email address:

tom@rtfa.org.uk

Can we publish your response?

This is a required question, please tick one of the following:

- yes

If you answered no, please tell us why below as we will need to understand this when responding to any Freedom of Information requests.

N/A

Privacy notice

By giving us your email address, you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.

We will not share your details with any other third party without your clear and full consent unless required to by law.

You can withdraw your consent to receive these emails as at any time by contacting us at enquiries@environment-agency.gov.uk.

The Environment Agency is the data controller for the personal data you provide. For more information on how we deal with your personal data please see our Personal Information Charter on GOV.UK.

You can also email our Data Protection team: dataprotection@environment-agency.gov.uk.

To help us when we come to analyse the consultation responses, we would like you to answer a few questions about you or, where relevant, about your organisation.

Are you responding as an individual or on behalf of an organisation or group?

Please choose one answer only from the following options:

☐ (a) responding as an individual
☒ (b) responding on behalf of an organisation or group (for example a business, charity, not-for-profit organisation, trade association)
☐ (c) other

If you chose (b) “responding on behalf of an organisation or group” what is the name of the organisation or group?

Renewable Transport Fuel Association

If you chose (c) please explain your area of interest.

N/A

What sector do you represent?

Please choose one of the following:

☐ Government & regulators
☐ Waste management
☐ Packaging
☒ Environment
☐ Business
☒ Industry
☐ other

If you selected 'other' please specify.

Renewable fuel manufacture

Please tell us how you found out about the consultation the new Resource Framework for Tyre Pyrolysis Oil

Please choose one of the following:

☒ From the Environment Agency
☐ From another organisation
☐ Through the organisation you're a member of
☐ Press article
☐ Through a trade association
☐ Other

If you selected 'other' please specify.

N/A

New Resource Framework for Tyre Pyrolysis Oil

Please refer to the consultation document for full details of these proposals.

Question 1: Is it clear within the resource framework document what requirements need to be met to achieve end of waste for tyre pyrolysis oil?

Please choose one of the following:

☒ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

The resource framework is very clear. A strong point of the RF is that it places reliance on the existing compliance regime in use by refineries (which are well regulated and subject to Environmental Permits).

Question 2: Is it clear tyre pyrolysis oil produced under this framework is suitable for use in the identified end market i.e. refineries?

Please choose one of the following:

☒ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

It's very clear. The specification sets out clearly what needs to be achieved, and the RF is unambiguous about the intended destination for the material.

Question 3: Do you foresee any potential adverse human health impacts from the use of the material in the manner described in the resource framework?

Please choose one of the following:

☐ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

We do **not** foresee any adverse human health impacts from the use of TPO in refineries. As per our answer to Q1 – refineries already must operate according to a range of strict regulations.

Question 4: Do you foresee any potential adverse environmental impacts (over and above other refinery feedstocks) from the use of the material in the manner described in the resource framework?

Please choose one of the following:

☐ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

We do **not** foresee any adverse environmental impacts from the use of TPO in refineries. As per our answer to Q1 – refineries already must operate according to a range of strict regulations.

Question 5: Does the specification detailed in section 8.4 of the Framework for Tyre Pyrolysis Oil identify all potential contaminants of concern?

Please choose one of the following:

☒ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

The EA have worked with various industry participants, and have been able to analyse test sample results, in order to understand the range of contaminants that may occur in TPO, as well as those that refineries need to check for. We are therefore very happy that all contaminants of concern are addressed in the specification.

Question 6: Does the specification detailed in section 8.4 of the Framework for Tyre Pyrolysis Oil adequately limit all potential contaminants of concern?

Please choose one of the following:

☒ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

Yes – as per our answer to Q6, we know that the EA have actively sought to understand the limits of contaminants of concern by engaging with industry. We agree that the limits that have been set are appropriate.

Question 7: Is the text of the resource framework clear?

Please choose one of the following:

☒ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
☐ Prefer not to answer

Please explain your answer.

Yes it is clear.

Question 8: Please share any additional comments that you think may help us improve our draft Resource Framework for Tyre Pyrolysis Oil:

We have no further comments as we are happy that this Resource Framework is very clear, and fit for the purpose that it is intended.

Publishing our consultation response

We aim to publish a response to this consultation on GOV.UK within 12 weeks of this consultation closing and before we implement any changes. It will include a summary of the comments and queries we received.

A link to our consultation response document will be added to the consultation page of Citizen Space. We will also send the link to our consultation response document to all consultees and other interested parties who asked to be kept informed.

Would you like to find out more about us or your environment?

Then call us on

03708 506 506 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Or visit our website

www.gov.uk/environment-agency

incident hotline

0800 807060 **(24 hours)**

floodline

0345 988 1188 **(24 hours)**

Find out about call charges (https://www.gov.uk/call-charges)

Environment first

Are you viewing this onscreen? Please consider the environment and only print if necessary. If you are reading a paper copy, please don’t forget to reuse and recycle.