2018 Repak ELT Member Survey.

John Coleman, Membership Manager. 20/02/2019

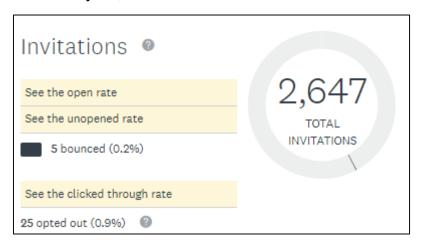
Survey Overview:

Repak ELT conducted a membership survey at the end of 2018 to review and reflect on the first year of the new scheme operating under the Waste Management (Tyres and Waste Tyres) Regulations 2017.

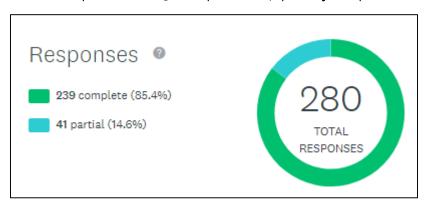
The survey was distributed to all Repak ELT members for their feedback. It was intended that this feedback would help the scheme improve in any areas which members suggested were of greatest difficulty. Furthermore, this would be an opportune exercise to help inform the DCCAE's independent review of the scheme in early 2019.

Sample Population:

The Repak ELT 2018 Membership Survey was opened on 14th December 2018 and was sent to 2,647 members. A reminder was sent to all those who had not yet responded on 3rd January 2019, before being closed off on 8th January 2019.



Overall, we received 280 responses with 239 complete and 41 partially complete.1



Based on this response rate, at a confidence level of 95%, we have a margin of error of 6%.

This means that our confidence interval is as follows:

Survey Answer Percentage = Membership Answer Percentage Membership \pm 6%

For example, if the positive response to a question is 70%, then the true figure in the population of 2647 members is between 64% - 76% and this would be correct 95% of the time.

¹ Partially complete surveys relate to some members who have not answered all questions but are still included in the overall report.

Executive Summary

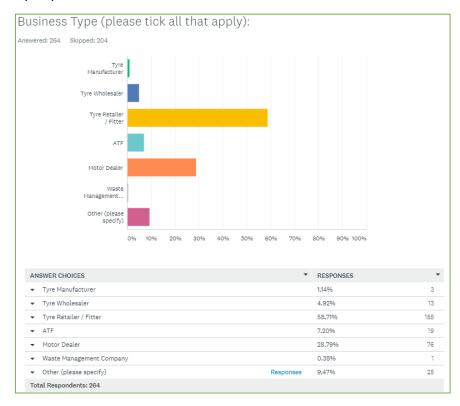
- There was a very wide geographical spread to the survey with all parts of the country well reflected.
- Most members have a workforce of between 1-5 employees (58%), with very few large companies being present in the industry Only 8.5% of respondents employ more than 25 people.
- 92% of members had received their 2018 Repak ELT certs, of which 93% of respondents had on display in their premises.
- 27% of members still do not display the vEMC as a separate line item on their sales documents.
- Over 20% of members have been contacted by their Local Authority and over 8% by the EPA.
- Over 80% of members were in favour of a licensing scheme to further regulate the tyre industry.
- There is quite an even breakdown of electronic vs. manual systems for recording sales/purchases transactions, and of those electronic systems there is a huge variety of potential software suppliers.
- Over three quarters (77%) of members only fit tyres which they sell to the customer. The remaining 23% of members are willing to fit tyres bought elsewhere by customers. Of these, only a tiny minority of respondents (2%) were unaware that they are required to charge the vEMC when fitting tyres which they have not sold.
- The monthly reminder emails for reporting appear to be working very successfully as almost 97% of respondents confirmed receiving them.
- There was substantial interest in receiving extra training for reporting.
- 37% of Producers who responded had not yet registered with the PRL.
- A large majority of respondents (74%) were not aware of the process for anonymously reporting free riders to Repak ELT.
- There was overwhelming satisfaction (97%) from members regarding the amount of email communication which they receive from Repak ELT.
- There was strong interest from members in receiving extra information leaflets.
- A large minority of ATFs are not raising CODs when processing ELVs.
- Less than 20% of ATFs appear to be selling Part Worn Tyres.
- Finally, Members rated their satisfaction level with Repak ELT at 7.5/10, or 75%.

Report Summary

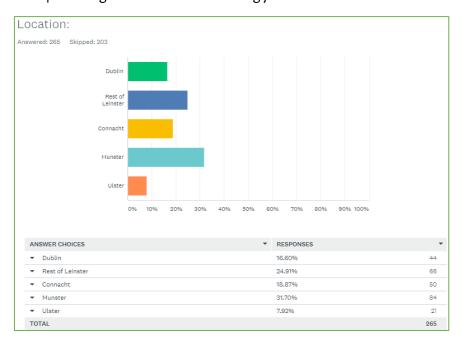
Member Details:

Members were asked to confirm some basic details such as their name, company and Repak ELT number.

When asked to identify their business type, most respondents were either Retailer/Fitters (59%) or Motor Dealers (29%).



There was a very wide geographical spread to the survey with all parts of the country well reflected, with Ulster's lower percentage reflective of there being just three counties.



Most members have a workforce of between 1-5 employees (58%), with very few large companies being present in the industry – Only 8.5% of respondents employ more than 25 people.

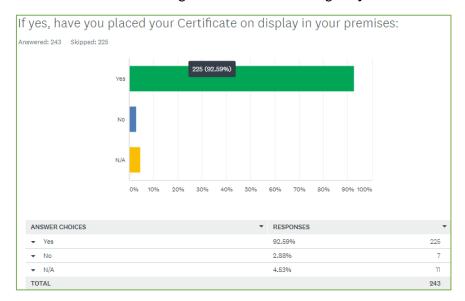


Enforcement:

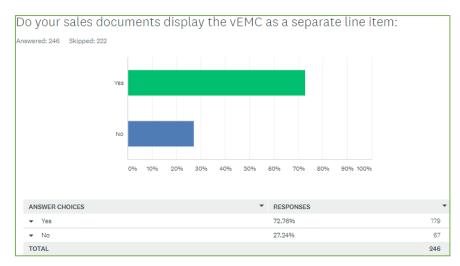
It was very positive to see such a high level of members acknowledging receipt of their Repak ELT certs (92%).



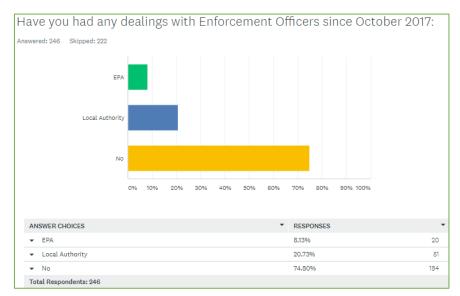
Again, 93% of members have their certs on display in their premises. We will highlight the importance of this to the members through our newsletters during the year.



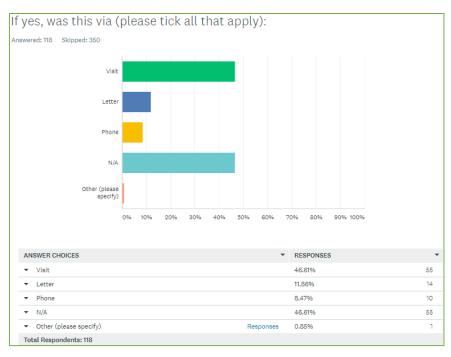
Somewhat disappointingly, after 15 months of the scheme in place, it appears that 27% of members still do not display the vEMC as a separate line item. We will work towards increasing awareness of the importance of this to all our members and involve the enforcement authorities where necessary.



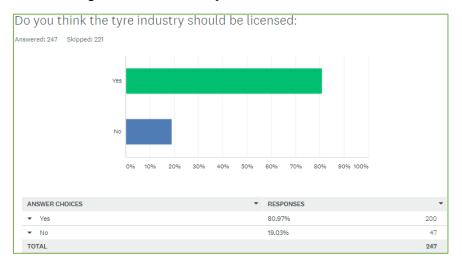
Over 20% of members have been contacted by their Local Authority and over 8% by the EPA. However, almost 75% of members have not had any dealings with enforcement bodies since the start of the new scheme. We will relay this back to the WERLAs and EPA at our next Enforcement meeting in April.



The bulk of those communications which did take place have been via site visits (46%), with smaller amounts being via letter (12%) and by phone (8%).

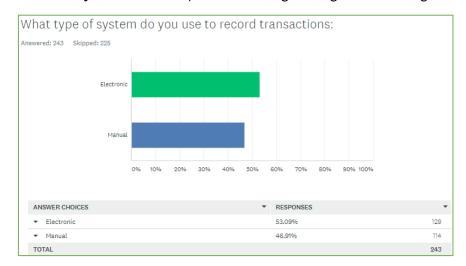


Based on feedback from members during site visits, etc., it became apparent that there is an appetite within Industry for a licensing process to oversee the tyre industry. Over 80% of respondents were in favour of such a licensing scheme and this may warrant further consideration from DCCAE.

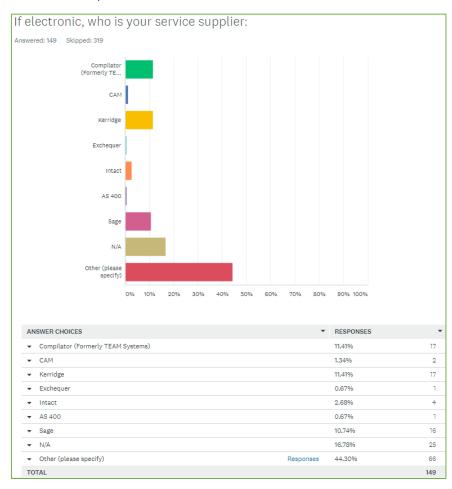


Reporting:

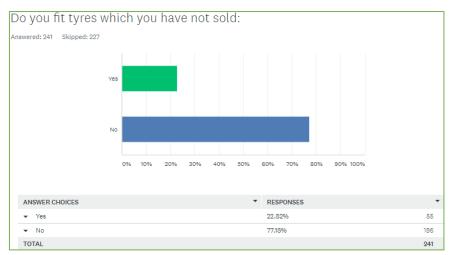
There is quite an even breakdown of electronic vs. manual systems for recording sales/purchases transactions. Electronic systems are more prevalent among the larger member organisations.



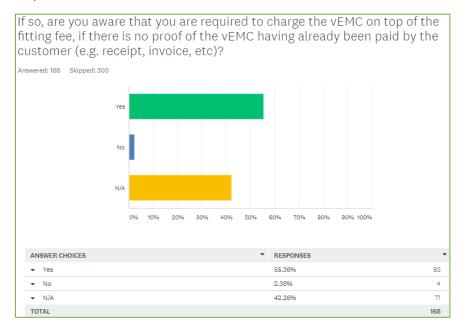
Looking at those who use electronic systems there is a huge variety of potential software suppliers. While Team Systems, Kerridge and Sage appear to be the most common, the huge 'Other' section highlights the multitude of options available.



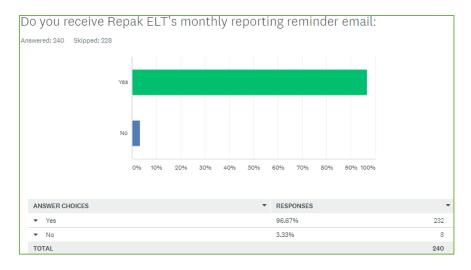
Over three quarters (77%) of members only fit tyres which they sell to the customer. 23% of members fit tyres bought online by customers for a price of between €10- €15 per tyre.



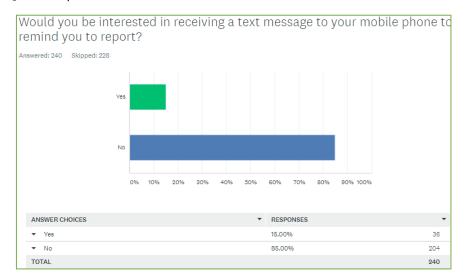
Only a tiny minority of respondents (2%) are not aware that they are required to charge the vEMC when fitting tyres which they have not sold. Therefore, the bulk of operators are likely to be charging the vEMC at this point.



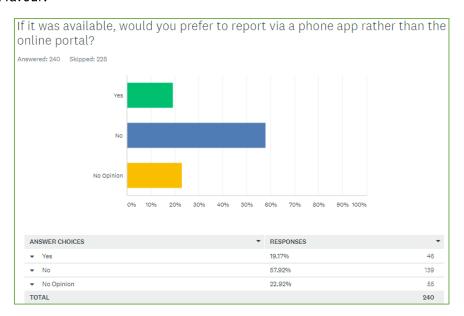
The monthly reminder emails appear to be working very successfully as almost 97% of respondents confirmed that they do receive them. We will follow up with those who responded negatively to confirm their email address details.



A proposal to offer a text message service to send reminders to members' mobile phones was declined by 85% of respondents.

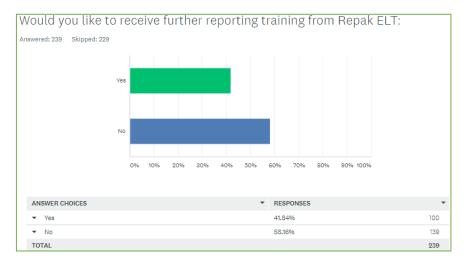


Somewhat similarly, an offer to report via an app was also declined by 58% of respondents with less than 20% in favour.

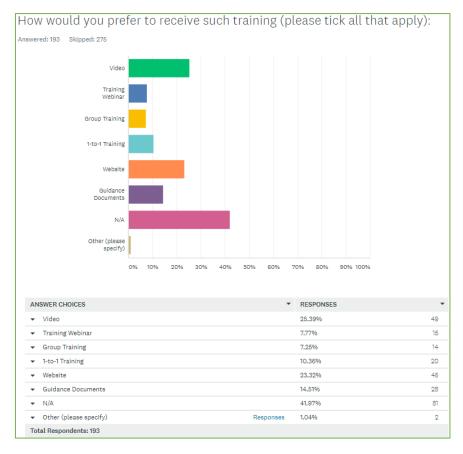


Training:

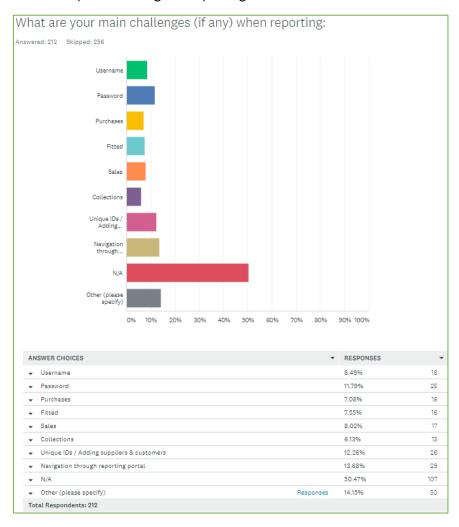
There was substantial interest in receiving extra training for reporting. We will follow up with the 100 members directly to address this requirement, while also continuing to offer training via our quarterly newsletters.



There was a wide spectrum of responses regarding the best platform to offer such training and again we will gather further feedback when contacting the relevant respondents.

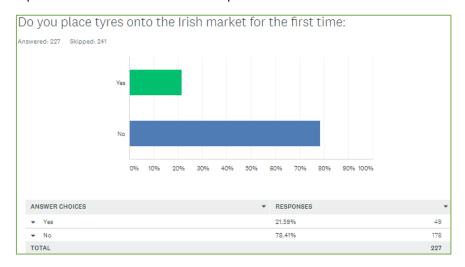


The majority of respondents had no issues with reporting which is good to hear. We will continue to gather information to improve training and reporting based on this feedback.

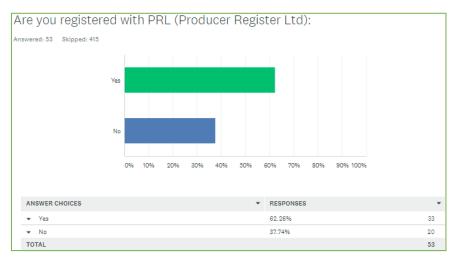


Producer Obligations:

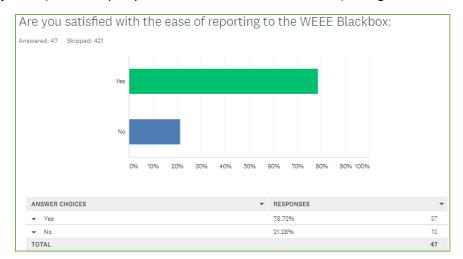
Over 21% of respondents declared themselves as producers.



Unfortunately, 37% of those respondents had not yet registered with the PRL. We will follow up with these members and, where necessary, pass on their details to the PRL for further action.

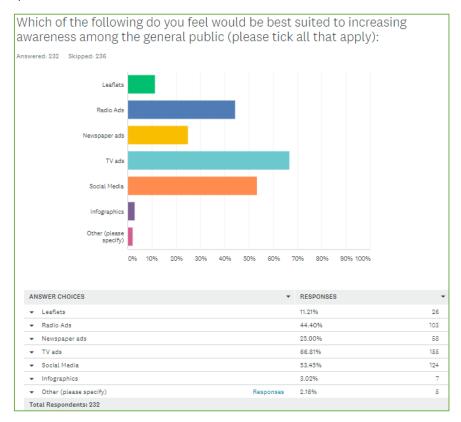


The majority of respondents (79%) were satisfied with the ease of reporting to the WEEE Blackbox.

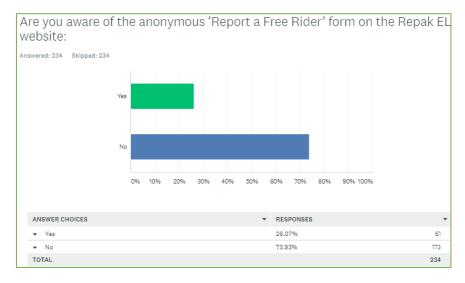


Awareness:

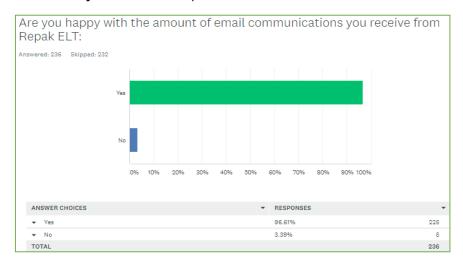
Radio & TV ads and Social Media were the preferred vehicles for raising awareness about the scheme to the general public.



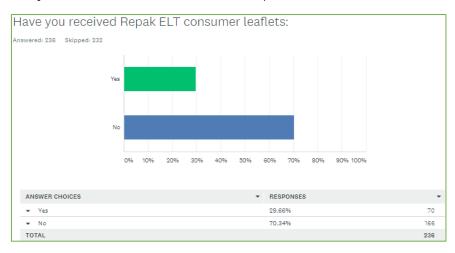
A large majority of respondents were not aware of the process for anonymously reporting free riders to Repak ELT. This is an area where we will need to raise awareness.



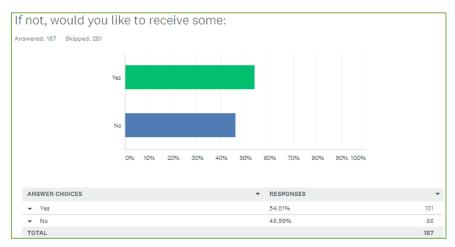
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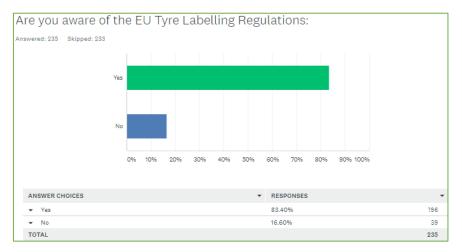
Over 70% of respondents have never received any information leaflets about the scheme. These were distributed by the collectors to the members of Repak ELT's behalf.



Over 100 members have requested for these leaflets to be sent to their business, something which Repak ELT will action throughout H1, 2019.

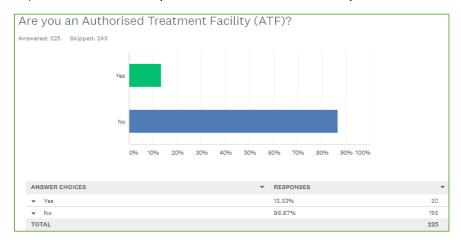


The vast bulk of the respondents were aware of the EU Tyre Labelling Regulations. For the benefit of the remainder we will outline on the Repak ELT website for their information.

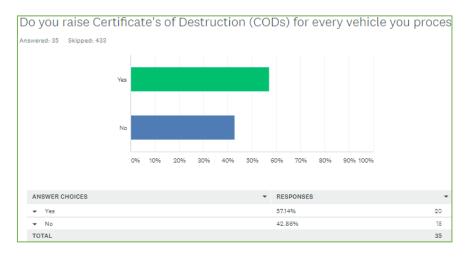


ATFs:

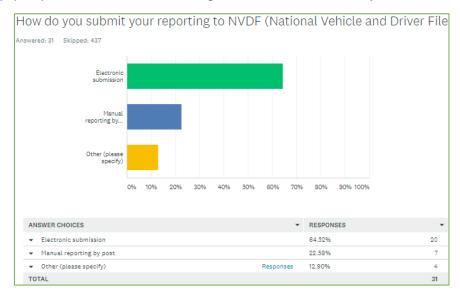
We received responses from 30 ATFs (Authorised Treatment Facilities).



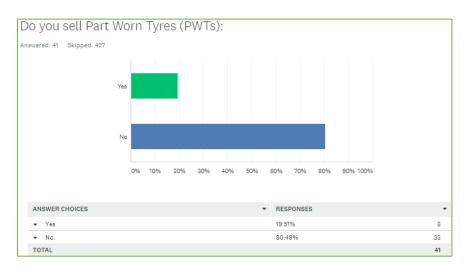
A large minority of respondents are not raising CODs when processing ELVs. Repak ELT only fund waste tyres from ATFs who can supply supporting CODs. We will investigate these 15 ATFs for further information regarding this issue. If required, general feedback regarding this situation may need to be sent to the WERLAS.



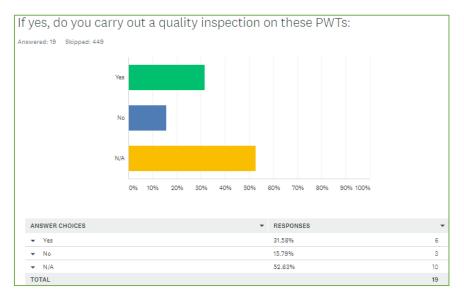
The majority (64%) of ATFs are now submitting their returns electronically to the NVDF.



Less than 20% of ATFs appear to be selling Part Worn Tyres. This highlights that this process is not critical to ATFs operations and should be considered when making our submission to the 12 month review.



Some ATFs who sell Part Worn Tyres carry out a quality inspection, but the standard of these inspections remains unknown.



Final:

The bulk of respondents are not part of any industry organisation, and those that are spread across several associations. This would suggest there is no cohesive voice that speaks for all industry.



Finally, members were asked to rate their satisfaction levels with Repak ELT. They responded with a score of 7.5/10, or 75% satisfied with the scheme. This is an impressive level given the landscape at the time of the scheme's launch when there was lots of misinformation being spread by parties unhappy with the new regulations.

