

## **Questions and Answers**

### **on the temporary suspension of tyre collections**

### **from Eltma collection points from 13 April 2026**

1. In your communication to participants and operators of collection points (CPs), you inform them of the temporary suspension of tyre collections from Eltma CPs as of 13 April 2026, referring to operational reasons being addressed, inter alia, with the Ministry of the Environment of the Slovak Republic. Could you please specify the reasons for the suspension of collections?

More than 3,300 collection points (CPs) are integrated into the Eltma system, from which Eltma collects waste tyres. Eltma thus ensures significantly denser territorial coverage of collection points than required by law (79 CPs across the districts of Slovakia), as additional retailers and municipalities continue to approach it with requests to join the system. In managing its collection network, Eltma has so far relied on the approach that it is obliged to include additional retailers and municipalities in the system upon request and to collect tyres from them free of charge and without linkage to other commercial relationships. However, this approach is not sustainable and was likely not intended by the legislator, as without adequate accompanying measures to distribute the related financial burden across the rest of the market, they are incompatible with the sustainable operation of the system.

For this reason, we have been engaging in long-term discussions, currently also intensively following the publication of data by the Ministry of the Environment of the Slovak Republic for the calculation of collection obligations for 2025, with relevant stakeholders, in particular the Ministry of the Environment of the Slovak Republic and other market participants, regarding an adjustment of the collection obligation for 2025 and further measures that will enable us to resume tyre collections.

2. The suspension is taking place at the beginning of the tyre replacement season, i.e. at a time of increased volumes of tyres being taken back from customers, when such a suspension causes significant operational difficulties. Was it not possible to schedule the suspension differently?

We are aware of this situation and, within our capabilities, we are seeking to minimise these complications, in particular by temporarily suspending the enforcement of SM exclusivity, i.e. allowing Eltma collection point operators to also approach other producers and compliance schemes with requests to take over tyres from take-back.

We firmly believe that all stakeholders recognise the need to rectify the collection obligations for 2025 so that the smooth and trouble-free collection of tyres can continue in 2026, as you have been accustomed to with the Eltma scheme.

3. **Why have other producers and compliance schemes not suspended collections, or is there a risk that they will also do so?**

We do not believe that there is a risk of collection being suspended by other producers or compliance schemes, as they generally have long failed to meet their collection obligations and, even for 2025, are not in a position to justify any adjustment of those obligations. The individual levels of collection obligations are known to these entities and the Ministry of the Environment; therefore, Eltma cannot comment further on the situation.

4. **In your letter to Eltma participants, you state that the suspension of collections does not affect the fulfilment of extended producer responsibility obligations. How does this align with the obligation to collect tyres from distributors (and retailers) and municipalities?**

Eltma neither waives nor avoids this obligation. On the contrary, it has been duly fulfilling it over the long term. The current operational suspension of collections and the intensive discussions with the relevant stakeholders are aimed precisely at enabling their prompt resumption and ensuring the continued existence and proper functioning of Eltma, so that, in cooperation with thousands of responsible contractual partners, it can continue to provide its services for the purpose of fulfilling legal obligations, protecting the environment in Slovakia, and ensuring a level playing field for tyre producers and importers on the Slovak market.

5. **What volume of tyres does Eltma approximately collect from its collection points per week during April and May?**

This amounts to approximately 650 tonnes of tyres per week (based on 2025 data).

6. **How many waste tyres does Eltma collect annually, and how many new tyres are put on the market annually by Eltma participants?**

In 2025, Eltma collected 28,258 tonnes of waste tyres. In the same year, Eltma participants put 17,661 tonnes of new tyres on the market.

7. **Are you concerned that some collection point operators may respond to this system-wide operational suspension of tyre collections by terminating their cooperation with Eltma?**

Such a development would be regrettable, as we value the reliability, responsibility and overall good cooperation of each of the thousands of entities involved in the Eltma system.

At the same time, we understand that the lack of a smooth mechanism for balancing excessive tyre collection in Slovakia, combined with the suspension of collections at the beginning of the season, may cause operational difficulties for some operators. Despite the possibility to temporarily approach other entities to take over tyres, some may choose to establish long-term cooperation with another producer or compliance scheme.

In accordance with Article 4.3 of the General Terms of Operation of Eltma collection points, each operator has the right to terminate the contract at the end of a calendar quarter by giving at least three months' notice. As this notice period (currently allowing termination by the end of September 2026) may present complications for some operators, Eltma is

prepared to agree on the termination of collection point operations on a more flexible basis with interested parties. If you are interested in the immediate termination of Eltma collection point operations, you may contact us via the Eltma information system, and we will be happy to assist you.

**8. What will happen to collections of tyres that have already been ordered and confirmed by Eltma?**

These collections will be carried out as standard, with the support of our reliable contractual partners, within the timeframes and in the manner set out in the General Terms of Operation of Eltma collection points.

**9. How many entities will be affected by the suspension of collections?**

Eltma operates more than 3,300 collection points across Slovakia to fulfil the extended producer responsibility obligations of 125 tyre producers and importers.

**10. Is the onboarding of new collection points into the system suspended during the period of collection suspension?**

It is not suspended, although the processing of new applications may temporarily take longer than usual. However, new collection points will also not be able to order tyre collections for the time being. For this reason, we recommend that applicants wishing to join the Eltma collection network also contact other producers and compliance schemes on the market (in alphabetical order):

- MIKONA s.r.o. ([www.mikona.sk](http://www.mikona.sk)),
- NOWAS s. r. o. ([www.nowas.sk](http://www.nowas.sk)),
- OZV Pneu, s.r.o. ([www.ozvpneu.eu](http://www.ozvpneu.eu)),
- SLOVMAS, a. s. ([www.slovmas.sk](http://www.slovmas.sk)),
- ŠIMKOVIČ – PROTEKTOR spoločnosť s ručením obmedzeným ([www.sprotektor.sk](http://www.sprotektor.sk)),
- Škoda Auto Slovensko s.r.o. ([www.skoda-auto.sk](http://www.skoda-auto.sk)).

**11. Is this an exceptional suspension of collections, or does it occur regularly?**

The suspension of collections occurs regularly in the period before the end of the year in order to meet the relevant compliance deadlines. Any suspension of collections at other times is exceptional, as in the current situation, until the collection obligations for 2025 are aligned. We are continuously, and currently even more intensively, engaging with the relevant stakeholders to adopt measures that will eliminate or minimise the need for such exceptional suspensions in the future.

**12. How is the suspension of collections related to the fact that Eltma is currently not allowing applications for reimbursement of participant contributions?**

The suspension of the acceptance of new refund applications is due to the same reasons as the suspension of collections, namely the need to align the collection obligations for 2025. Although the reimbursement programme is voluntary and, in accordance with the General Terms of Participation in the Eltma collective scheme, its conditions are determined solely

by Eltma, we fully recognise the operational and economic need of our exporting participants to resume this programme as soon as possible. Applications for refunds that have already been submitted are being processed as standard, and applicants will be informed of the outcome within the usual timeframes.

**13. Is Eltma insolvent, or is the fulfilment of its contractual obligations at risk?**

Eltma is not insolvent, and the fulfilment of its contractual obligations is not at risk. These measures are being adopted with due care and diligence in order to ensure the continued proper and sustainable operation of the system.

Version 1.0  
Last updated: 13 April 2026