



Ms Gina Cass-Gottlieb
Chair and Agency Head
23 Marcus Clarke Street
Canberra ACT 2601

Email: exemptions@acc.gov.au

19 January 2024

Dear Ms Cass-Gottlieb

Re: Tyre Stewardship Australia Limited application for revocation of authorisation AA1000409 and substitution of AA1000655

Thank you for the opportunity to provide feedback on Tyre Stewardship Australia Limited's application for re-authorisation. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's entire \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies.

In 2022-23 Australia consumed around 760,000 tonnes of new tyres, generating an estimated 545,000 tonnes of used tyres and recovering around 320,000 tonnes. The majority of automotive tyres (passenger and truck tyres) are recovered with an average rate of 86% of the past five (5) years while off-the-road (OTR) tyres has averaged a 10% recovery rate over the same period. It would appear that the size, structural features (including geographical location) and sectors OTR tyres are used in (mining and agriculture) contribute to a lower recovery rate.

WMRR also understands that the market for recovered tyres over the last five years (5) has seen 24% of tyres recovered domestically mostly for recycling as road construction additives, playground flooring, sports surfaces and retaining walls.¹ The remaining 76% were exported, the majority of those processed prior to leaving Australia into a tyre derived fuel.²

Automotive tyres have a high recovery rate and high sector profile while the data highlights OTR tyres remain a problem. In part this may be due to the geographical barriers and costs that prohibit recovery as well as different regulation environments for the mining and agriculture sectors. As it stands the current scheme does not appear to have the support to address the regional and sectorial challenges posed. The mining and agriculture sectors would appear to require the attention of policy makers to hold all parties equally accountable.

¹ National Waste Report 2022, Department of Climate Change, Energy, the Environment and Water

² Australian Tyre Consumption and Recovery – 2022-23, Tyre Stewardship Australia

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WMRR supports an extension at this time, given the recent addition of tyres to the Minister's Product Stewardship Priority List and the current review underway to investigate developing national principles for tyre product stewardship by WA. As such, the three (3) year timeframe will hopefully be sufficient for a decision on a regulated scheme and a review of operations. Maintaining the status quo will also assist in evaluating the effects of the 2021 end-of-life whole tyre export rules on domestic demand and market saturation for recovered tyres recognising that Australia cannot recover all materials imported.

Thank you for consideration of WMRR's submission, if there are any queries, please contact the undersigned.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia