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Department of Water and Environmental Regulation
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By email: wastereform@dwer.wa.gov.au

30 September 2024

Dear Mr Jones

Re: Discussion Paper - National Project on Options for End-of-life Tyres

Thank you for the opportunity to provide feedback on the National Project on Options for End-of-life Tyres Discussion Paper ("Discussion Paper"). The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$17 billion waste and resource recovery (WARR) industry. With more than 2,280 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 Western Australia, WMRR represents over 180 individual members from more than 35 entities. The state generates 8.05 million tonnes of waste each year with a resource recovery rate of 64% delivering an economic value of \$724 million employing 5,070 West Australians.

WMRR understands that the *National End-of-Life Tyres Options Project* ("the Project") seeks to guide the decision-making process of the national Environment Ministers by providing a collective understanding of the issues associated with End-of-Life tyres (EOLTs) including Off-the-Road (OTR) tyres, and identifying target actions aimed at addressing the challenges of EOLTs that can be implemented. The Project is being led nationally by the Department of Water and Environment (DWER).

The Discussion Paper provides a very high-level analysis of proposed options, given a detailed assessment of the options is noted as outside the Project's scope, with a cost-benefit analysis described as a possible next step in the process for the Environment Ministers along with a policy impact analysis. Stakeholders have been asked guided questions regarding the problem statements, objectives and principles, options analysis and findings from the Discussion Paper. WMRR has addressed these specific questions in **Annexure A** and has made further comments to DWER in this submission regarding what WMRR considers to be a lack of a common-sense approach to the Discussion Paper's analysis of EOLTs.

Moreover, WMRR wishes to reiterate at the outset, that the current approach of government towards managing challenging material streams is problematic and time consuming as it requires case by case intervention. Rather Australia requires an overarching certain systems approach, akin to the EU Waste Directives Framework that makes it clear the order of preference for managing waste and places

obligations squarely on those that produce and place products on market, i.e. creating by default a real paradigm of extended producer responsibility (EPR). Such a framework needs to be implemented nationally by the Environment Ministers in order to achieve circular outcomes and the avoidance of waste, and WMRR's comments to DWER regarding the challenges presented by EOLTs exemplify the key reasons why. In the absence of such a clear framework, Australia will continually struggle to meet both its circular and resource recovery objectives, as there will be no positive obligation on those that make products, to take responsibility for their products and their impacts (environmentally or economically).

As fierce proponents of the resource and waste management hierarchy, WMRR advocates for beyond end-of-life material management and the reinvestment of valuable resources back into the economy in order that less can be used for longer. Mandated sustainable product design regulations and EPR schemes, market development initiatives (such as government procurement of locally sourced recycled content) and the application of policy initiatives such as recovered material framework and regulatory support for applying the waste management hierarchy to preference resource recovery initiatives should be supported by the federal government under a waste directives framework. Importantly, particularly in the context of remote communities, any resource recovery – including energy from EOLTs - must be recognised as being a higher order use than the existing burial, disposal or stockpiling practices. WMRR again states that the Environment Ministers must act to implement a waste directives framework built upon these elements, as they are inextricably linked to key waste management hierarchy and circular economy principles.

WMRR has provided the following comments regarding the challenges of EOLTs -

Acknowledgement of the differential recovery rates of OTR and automotive EOLT under existing voluntary stewardship.

The recovery of EOLTs within Australia is currently supported by the voluntary National Tyre Product Stewardship Scheme, administered by Tyre Stewardship Australia (TSA). Approximately 58% of tyres are recovered in Australia, for use in domestic and international markets as either reused tyres (as is or retreaded and repaired) or tyre derived products. The recovery of passenger and truck EOLTs (automotive tyres) sits at around 86%. However, Figure 2 in the Discussion Paper shows that Australia's current estimated recovery rate of OTR EOLTs is approximately 8%. Research from the TSA has established that most OTR EOLTs are generated by the mining sector (79%), followed by agriculture (11%)¹.

The December 2021 export bans (requiring exports for re-treading to be sent to verified re-treading facilities only) helped drive investment into the recovery of automotive tyres for constituent parts and tyre derived materials and fuels. OTR EOLTs are largely contained to remote mining and to a lesser extent, agricultural communities, posing obvious logistical hurdles for transport and aggregation of large EOLT volumes. The dichotomy between OTR

¹ Tyre Stewardship Australia (2023), Tipping the balance - The business case for a circular economy for Australia's off-the-road tyres, conveyors, and tracks, TSA, www.tyrestewardship.org.au/wp-content/uploads/2024/01/TSA-OTR-Tipping-the-balance-Full-report.pdf

and automotive EOLTs is also apparent through regulations that apply to other areas of waste management and landfill being silent when it comes to onsite disposal of OTR products, as such there is neither an incentive nor a requirement to recover and recycle them. These are unique challenges to separate classes of EOLTs.

For this reason, EOLT options that class these groups together with fee-based penalty schemes for disposal or incentives for aggregation points (like metropolitan and regional based CDS schemes) simply will not work. The obvious remoteness of the specific industries that utilise OTR tyres and their vast spread across the Australian landscape (and the consequence hurdles for aggregation and infrastructure for EOLT recourse recovery) is barely acknowledged or analysed as a specific problem in the Discussion Paper, nor by the TSA who have described the difference between the recovery of automotive tyres and OTR tyres coming down to *“...the size and structural features such as large beads and the sectors in which they are used such as mining and agriculture. These features make them more difficult to handle and process and lend themselves to being left on land or buried where permissible by regulation”*.²

WMRR agrees that the current permissibility of simply disposing of tyres on site is an issue, however the Discussion Paper and options presented within it seem to lack common-sense analysis of the tangible logistical and transportation challenges of recovering of OTR EOLTs in the remote communities where they are predominantly located. Rather, the paper appears to largely insist on addressing the recovery of EOLTs with one (1) “comprehensive scheme” across both automotive and OTR tyres, without any clarity as to how this was derived at (or if it is even feasible).

WMRR also notes that the consideration of tyre recycling and stewardship schemes in European countries – which do not face the lack of regulatory support Australia has, nor the geographical challenges of Australia’s mining and agricultural sectors – appear to have been given considerable weight in the Project’s analysis.

The need for government to intervene with mandated product design and EPR requirements.

As outlined above, OTR and automotive EOLTs face separate challenges to achieve resource recovery, and it makes little sense to lump these two (2) tyre categories together. It is therefore surprising that the findings from the Discussion Paper recommend specific interventions such as fee-based voluntary product stewardship to the category of “tyres” as a whole. More importantly, the Discussion Paper often points to minimizing impacts on tyre manufacturing businesses – which WMRR strongly disagrees with.

WMRR strongly supports a mandatory EPR schemes being put in place for all industrial product categories (including tyres) and sees this as an essential part of a broader waste directives framework. Without government requiring the circular nature of the tyre supply

² Tyre Stewardship Australia (2023), Australian Tyre Consumption and Recovery – 2022-23 A, TSA [Australian-Tyre-Consumption-2022-23.pdf](https://www.tyrestewardship.org.au/Australian-Tyre-Consumption-2022-23.pdf) ([tyrestewardship.org.au](https://www.tyrestewardship.org.au))

chain, there will not be enough momentum or incentive for manufacturers to place products into markets that use less for longer. This is especially the case for products like tyres, which are largely imported.

Currently, tyres are largely imported into Australia without any design requirements by Government. For EOLTs, EPR laws would require companies that import tyres into Australia to fund the collection and management at their end of life – firmly placing responsibility on the waste generators. In this respect, WMRR strongly disagrees with the comments in the Discussion Paper relating to the sharing of responsibility between producers, consumers and government, and genuinely queries what the goal of the Paper is when it includes a guiding principle that aims to “minimize impact business and limit the impost to the tyre industry”, the very industry that creates this challenging material stream. At its crux, this statement directly undermines any attempts to establish a circular economy - which by its very nature, necessitates directly impacting businesses and industry in order for them to address design requirements in order that constituent systems and resources will be invested in to improve lifecycle and invest at end-of-life.

WMRR also disagrees with the Project’s comment on page 6 of the Discussion Paper that *“Many of the problems with EOLTs are driven by a failure of the market to adequately price-in the cost of collection and resource recovery”*. It is WMRR’s view that this cost, in a circular economy, should exclusively be borne by the producer. This ties back to the fundamental principle of the waste management hierarchy to avoid the creation of waste in the first place. The creation of problem materials – like EOLTs - should not be left to the WARR industry to solve and bear the financial and environmental burden which is then ultimately passed on to the community often leading to problems with untracked disposal stockpiling and illegal dumping to avoid the necessary waste management costs. As noted in the Discussion Paper, research by Blue Environment found that local governments are collectively having to pay around \$6.5million annually to clean up inappropriately disposed EOLTs.

Under a waste directives framework, EPR can be introduced in a gradual yearly pathway, similar to the current model in Chile which commenced in 2023 and by 2030, sees them targeting 100% for passenger cars and 90% for mining tyres. Much like Western Australia (WA), Chile struggles to manage mining across vast regions. Mandatory EPR schemes are a useful tool to help track tyre management across the different jurisdictions. WMRR notes that the National Association of Tyre Retreaders and Importers (ARNEC) faced some hurdles with the EPR Law implementation, with regulatory gaps and delays from state entities in granting necessary authorisations leading to a failure to meet the 2023 collection and recovery targets³. The potential lack of synergies with other regulatory instruments is why mandated EPR schemes should be considered wholistically as part of the waste directives framework.

If Australia is serious about bringing tyres into the circular economy, then we must mandate product design requirements which provide a pathway to keep the valued resources within

³ How does the EPR Law continue in Chile?, [Daniel Rojas](https://www.retreadingbusiness.com/how-does-the-epr-law-continue-in-chile/), March 6, 2024, <https://www.retreadingbusiness.com/how-does-the-epr-law-continue-in-chile/>

tyres being reinvested into our economy. Implementing a regulated extended producer responsibility (EPR) scheme, which includes all aspects of design and markets is a valuable way to ensure that there are ready markets for the products recovered from EOLTs. Given the unique challenges of Australia's vast geography, a "one size fits all" approach cannot be strictly applied, and the range of recovery options available for EOLTs in the context of their specific end-uses, possible markets and locations, need to be considered within the framework. The OTR EOLTs scenario is a case-in-point.

Recovery must always be preferred over landfill – and this must be reflected in policy and regulatory settings in order that ready end-product markets can be accessed.

The Discussion Paper has attempted to identify the problems limiting the circular economy opportunities for EOLTs using three (3) categorical statements relating to risks and costs, missed opportunities for recovery and loss of resources, and limitations and inequities of the current framework. These motherhood statements lack the necessary analysis about what WMRR considers the fundamental explicit problem with the existing framework - that circular economies start with product design to avoid creating waste in the first place, and further, that the application of the waste management hierarchy prefers any recovery solution over landfill. It follows that the regulatory and policy settings must be in place to enable reasonable and practicable recovery solutions in those communities where the resources are currently located and being under-utilised (or disposed of).

As the state government leading the Project, WA is in a unique position to apply a nuanced understanding of the challenges for OTR EOLTs given the state's economy is largely driven by the mining and resources sector which is the largest generator of OTR EOLTs at about 50,000 tonnes per year⁴. Queensland, another largely resource driven economy comes second at around 46,000 tonnes (34%) and NSW at around 25,000 tonnes (18%).

The clear dichotomy between automotive (passenger and truck) tyre recovery (which is supported by recycling and recovery technologies and collection points within the metropolitan and regional centres) and the remote locations of Australia's mining and agricultural communities needs to be recognised at the outset. This leads to important considerations about how the resources within OTR EOLTs could add the most value to accessible end-markets, which should include consideration of energy recovery as well as the recycling of constituent materials such as rubber and steel. Energy recovery is a preferable option under the waste management hierarchy to landfill and still meets circularity principles yet is barely addressed in the Discussion Paper.

⁴ Tyre Stewardship Australia (2023), Tipping the balance - The business case for a circular economy for Australia's off-the-road tyres, conveyors, and tracks, TSA, www.tyrestewardship.org.au/wp-content/uploads/2024/01/TSA-OTR-Tipping-the-balance-Full-report.pdf

Appreciation that resources recovered need viable end markets.

Whilst we all work to deploy the waste management hierarchy, it is vital that we are realistic as to the existence of available end markets to ensure the economic viability of the recovery process. For example, OTR tyres typically contain higher concentrations of natural rubber compared to car tyres, holding promise for closed-loop recovery solutions. However, the reality is that there is lack of recycling and reprocessing infrastructure in the highly remote communities where OTR EOLTs are located, and limited market demand for these products in Australia. Carbon costs of transport, potential stockpiling of tyre volumes and the economic and environmental costs associated with onsite aggregation for long periods of time would be considered as part of a waste directives framework that is focused on the creation and maintenance of a circular economy. Energy recovery from the thermal treatment of OTR EOLTs for example, may be the better solution for these scenarios, noting that energy too – like rubber crumb - can be a valuable resource. It follows that policy and regulatory settings need to be in place that support available and suitable technologies that aid the recovery of resources instead of landfill.

Building a circular economy based on the reinvestment of resources relies on government support to build a paradigm that generators are responsible and accountable for the products they make and place on market mandated EPR scheme, to this end we require design mandates, certain policy and regulatory settings that support the application of the waste and resource recovery hierarchy to avoid landfill, and the development and ongoing support of ready end-markets for the resources recovered. The current challenges and gaps seeking to be addressed by the Project are linked to these crucial elements not being in place. Taking steps to implement fee-based schemes that are not backed by systems thinking, government mandates or regulation to keep materials used for longer only results in the protection of a linear economy that places responsibility on the WARR industry to deal with unwanted materials without shifting responsibility to the starting point of the supply chain to create circularity. Linear focused solutions are not going to effect change and achieve the circular outcomes desired. Therefore, the findings from the Discussion Paper cannot be endorsed by WMRR, and we would encourage greater thinking and action to address the system as a whole and not simply applying band aids.

WMRR's responses to the survey questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely



Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

Response to the survey questions

WMRR Responses to the Survey Questions	
<u>Problem Statements</u>	
Do you think the identified problem categories adequately cover the range of issues with end-of-life tyres in Australia? If not, please specify what is missing. Problem Category 1: Risks and costs to the environment and communities Problem Category 2: Missed opportunities for recovery and the loss of resources Problem Category 3: Limitations and inequities of the current framework	No. It is WMRR's view that the Project has not identified the key problems with the existing EOLT framework in Australia. WMRR would identify these problems as being: 1. The lack of a wholistic waste directives framework that correctly places responsibility on producers across all industries to ensure circularity of their product design – thereby enabling less to be used for longer. 2. There are no genuine Extended Producer Responsibility Schemes proposed- instead it looks like a CDS and does little to address problems, the very different product streams. 3. Recycled product markets are not supported by these proposals. 4. Tyres are not recognised as a residual waste for the mining and agricultural sectors in all jurisdictions. This leads to inaccurate data about the movement of EOLTs in these sectors. 5. There has been significant investment in the recovery of passenger tyres since the December 2021 export bans requiring exports for re-treading to be sent to verified re-treading facilities only.
Do you feel that any of the identified problems is of greater importance/urgency than the	In WMRR's view, the generalised "problem statements" are not cognisant of the very specific existing challenges in Australia for ELOTs. Specifically, the remote locations of the mining sector – which then plays into how the application of waste management hierarchy principles can reasonably and practically be applied.

WMRR Responses to the Survey Questions	
others? If so, please specify which and why.	Considering this, Option 4 (OTR specific) may be a better starting point, but WMRR cautions that a real EPR scheme needs to be holistic akin to all waste directives in Australia in order that “fee” schemes are not put in place without considering the broader and increasingly important circular principles that should be guiding all of Australia’s product design mandates and legislative frameworks. The risk here is that we have a “pay and throw” scheme, that then absolves the generator or responsibility for designing well, and we have no real link to growing sustainable markets, rather that becomes the province of the recycler- this model is flawed and will fail. Only with settings that design out waste and enable less to be used for longer by industry can there be certain investment into technologies that will enable resources to be recovered in accordance with the waste and resources hierarchy. Furthermore, the design and standards for products cannot be considered alone. The demand and markets for the resources recovered must also be required and this necessitates a whole of waste directive approach. None of the options presented by DWER are comprehensive in this regard.
Are there further issues that need inclusion or do any issues need to be adjusted or reframed?	Please refer to WMRR’s submission letter.
<u>Objectives and Principles</u>	
Do the identified policy objectives and guiding principles reflect the types of considerations you would expect should guide policy development?	Somewhat. The entire supply chain needs to be considered rather than taking an academic approach by matrixing potentially competing principles. Instead, a truly circular assessment that recognises that waste avoidance, reinvestment of materials, fit-for-purpose uses, and logistical efficiencies are equally part of the supply chain and the circular economy. A holistic approach will generate a common-sense solution. WMRR appreciates that the objectives and guiding principles may help guide policy development, but feels that in this context, a common-sense approach must prevail and attempts to apply these principles into a matrix to assess the considered options distorts the crucial geographic and economic issues that are vital considerations of the OTR tyre problem in Australia.

WMRR Responses to the Survey Questions

	Moreover, the fundamental objective and principle that should be guiding the Environment Ministers should be those of creating a sustainable circular economy, which is inextricably linked to applying the principles of the waste and resource recovery hierarchy. <table><tr><th></th><th>Not Relevant</th><th>A little relevant</th><th>Fairly relevant</th><th>Very relevant</th><th>Extremely relevant</th></tr><tr><td>Environmental protection</td><td></td><td></td><td>x</td><td></td><td></td></tr><tr><td>Human health protection</td><td></td><td></td><td>x</td><td></td><td></td></tr><tr><td>Emissions reduction</td><td></td><td></td><td>x</td><td></td><td></td></tr><tr><td>Waste avoidance</td><td></td><td></td><td>x</td><td></td><td></td></tr><tr><td>Resource recovery</td><td></td><td></td><td>x</td><td></td><td></td></tr><tr><td>Equitable and sustainable markets</td><td></td><td></td><td>X</td><td></td><td></td></tr><tr><td>Improved data and information</td><td></td><td></td><td>x</td><td></td><td></td></tr></table>		Not Relevant	A little relevant	Fairly relevant	Very relevant	Extremely relevant	Environmental protection			x			Human health protection			x			Emissions reduction			x			Waste avoidance			x			Resource recovery			x			Equitable and sustainable markets			X			Improved data and information			x		
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Do the identified policy objectives and guiding principles reflect the types of considerations you would expect should guide policy development?	WMRR notes that the considerations that should be top of mind in the context of EOLTs should reflect those of the greater circular economy goals – that is, starting with the producers of products to design for extended and circular use. This should be the paramount concern and key point of action under a waste directives framework so that the waste management hierarchy is adopted and promoted. It should not be the WARR sector that is left with this problem to solve. Producers must be held accountable for the products they place on the market and EPR schemes need to be regulated in order to achieve improved resource recovery. It should not be the WARR sector that is left with this problem to solve. Producers must be held accountable for the products they place on the market and EPR schemes need to be regulated in order to achieve improved resource recovery. The vast obligation for the circular economy must be on products. WMRR strongly disagrees with the principles of ensuring that producers and consumers of products contribute to their suitable management. The responsibility for products should lie firmly with the producers. Further, government should be intervening so that that those producers that cannot do this, are not given access to the Australian consumer market. This level of government intervention is needed if Australia is serious about achieving a circular economy. Further, the Australian and state governments need to foster an environment that supports the recovery of materials that cannot otherwise																																																

WMRR Responses to the Survey Questions						
	be reused, recycled or repaired – and that includes energy recovery. Aligning the waste directives to the legislative frameworks in each state – in particular, the EfW framework in the mining states (WA, QLD and NSW) will help mining operators to put in place circular economy plans that utilise the EOLT residuals they have on site.					
		Not Relevant	A little relevant	Fairly relevant	Very relevant	Extremely relevant
the precautionary principle				x		
a circular economy						x
outcomes focused and efficient				x		x
being equitable				x		
being resilient				x		
being open and fair				x		
supporting flexibility and innovation						x
ensuring producers and consumers of products contribute to their suitable management				x		
Are there any key objectives or principles missing from the lists? If so, please specify	Please refer to WMRR’s submission letter.					
<u>Options Analysis</u>						
Do the assessed option classes sufficiently cover the types of options that might support better	The options presented in the Discussion Paper should not be considered as exclusive solutions for EOLTs. A comprehensive waste directive framework that is based on circular economy and waste and resource recovery hierarchy principles should be implemented rather than the singular options as, in WMRRs view, these do not go far					

WMRR Responses to the Survey Questions

recovery and more circular outcomes for EOLTs?

enough to place strict accountability on the producers of materials to design out waste, nor put in place systems thinking to prolong life and manage impact (including cost).

Further, WMRR stresses that

- automotive and OTR EOLTs should not be considered as one (1) category
- product stewardship schemes should not be based on fee-based incentives for collection to simply avoid disposal without established end-markets and genuine generator responsibility.
- when applying the waste management hierarchy principles, recovery of resources must be cognisant of available markets. For example, energy resource recovery from OTR EOLTS in remote communities is preferable to landfill, and may be economically viable given the high volumes of material currently not recovered at all and the remote locations that may already lack access to affordable energy from the grid. Obviously, this argument for energy recovery would not apply to the automotive tyre sector where tyre stewardship has benefited recycling.

	Yes	No	Not sure
Option 1 - Voluntary scheme - current settings			X Should have elements mandated given the imports of tyres into Australia, and the current prevalence of free riding. The Australian WARR industry should not be burdened with finding an 'end-of-pipe' solution for any problem waste – including tyres. Strict accountability must be placed on all producers of materials in circular economy markers.
Option 2 - Regulated product stewardship	X		OTR and automotive tyres should not be considered under one (1) blanket scheme.
Option 3 - Government fees and rebates system	x		Rebates for collection alone are ineffective without established end markets for the

WMRR Responses to the Survey Questions					
					recovered resources. Governments must also support the development of those markets to avoid material warehousing/stockpiling and illegal dumping.
	Option 4 - OTR tyre measure (+ Option1)	x			Given that tyres are imported into Australia, voluntary setting.
	Option 5 – Disposal bans	x			Currently, on site burial is permitted for many OTRs in remote mining /agricultural locations. Aligning the principles of the waste management hierarchy as part of a waste directives framework would help EOLTs to be recognised as a resource for recovery - including “lower order” recovery where there are appropriate markets for those products recovered (including energy).
	Option 6 - Standards and design rules	x			Mandatory design rules and standards should be in place under the waste directives framework in order that all products in the circular economy are able to be reinvested and waste is designed out. Product design rules and mandatory EPR schemes for imported materials would be a positive step worthy of further analysis.
	Option 7 - Programs targeting issues	x			Any governmental support that puts resources into addressing problem materials will be beneficial.

WMRR Responses to the Survey Questions				
	Option 8 - Market development	x		Market development for recovered resources is essential under a waste directives framework. This should also be driven by government itself in many ways, through committing at all levels to mandatory sustainable procurement of recycled content, buy-back schemes for processed 'waste' materials and investment in infrastructure that can recover local resources to keep less in use for longer.
If not, what other options should be considered?	WMRR has detailed the need for a waste directives framework in its comments for this submission			
Does the option class scoring in Table 3 above reflect what you would expect each option class is capable of, and if not why?	Please refer to the comments in the table.			
<u>Findings</u>				
Do you agree that Option classes 2 and 3 are best able to manage the identified problems? If not, what other option would you prefer?	The Discussion Paper does not go into an adequate level of analysis about the specific challenges of the EOLTs issues for Australia for WMRR to agree with the Discussion Paper's findings. Further, the analysis is not transparent using vague concepts rather than specific examples, resulting in what WMRR feels is a discussion that lacks a common-sense approach. The case-in-point being that the link between the high levels of unrecovered OTR EOLTs is not directly linked to the remote locations of the mining and agricultural sectors and the demand for resources by those specific sectors is not addressed. This misses the opportunity for energy recovery to be given consideration as a way to displace the high volumes of OTR EOLTs currently being buried.			

WMRR Responses to the Survey Questions																							
	The Discussion Paper’s findings appear to indicate that a fee-based solution is the most supported option, however this would not meet the circular economy objective of shifting the balance of responsibility for developing and funding circular solution to extend life, as well as designing out waste and placing these obligations on producers. Australia’s focus must be on creating a level playing field (which includes eliminating free riders), mandating sustainable design, reuse and repair and generate markets for recycled materials in order that they are given the same intrinsic value as virgin materials. This is what WMRR refers to a waste directives framework. It is imperative that these steps are taken as soon as practicable to start phasing out linear waste thinking and employing circular economy thinking, and that must state at product design and controlling those products that enter the circular economy in the first place.																						
Do you agree with the findings regarding targeted options? If not, please specify other ways targeted options might be considered?	WMRR has detailed in its submission letter that a comprehensive approach is needed, and that it should be in the form of a broader waste directives framework, that goes well beyond EOLT.																						
What candidate features seem more promising or less promising to improve end-of-life tyre outcomes, and why?	WMRR reinforces our earlier comments relating to the unique challenges impacting the recovery of automotive and OTR EOLTs, warranting them to be considered separately. <table><tr><th></th><th>More Promising</th><th>Less Promising</th><th>Not sure</th></tr><tr><td></td><td></td><td></td><td></td></tr><tr><td>Improved Regional and remote collection</td><td></td><td>x</td><td></td></tr><tr><td>Improved higher-order recovery</td><td></td><td>x</td><td></td></tr><tr><td>Incentives matched to real costs</td><td></td><td></td><td></td></tr></table>				More Promising	Less Promising	Not sure					Improved Regional and remote collection		x		Improved higher-order recovery		x		Incentives matched to real costs			
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	Improved tyre quality for beneficial characteristics			
	Increase recycled content			
	Support tyre recyclability			
	Reduced toxicity of tyre constituents			
	New standards, market development, and R&D	x		
	Framework flexibility			
	Clear and measurable outcomes-based targets			
	Compatibility with functioning markets and systems	x		
	Mechanisms to manage illegally dumped and/or legacy tyres			
Are there other candidate features that should be considered, and if so, what are they?	WMRR advocates for the principles of a circular economy and the waste and resource recovery hierarchy. This means avoiding the creation of waste from the outset. Mandated sustainable product design to enable less to be used for longer – should apply to all industries including tyres. EPR schemes (under a directives framework) should be mandated where necessary, particularly for imported materials. Resource recovery should be prioritised and that includes considering pathways to recover those resources that may not have as high economic value as constituent parts, but which have ready markets available. WMRR notes that the Discussion Paper is not intended to be a cost benefit analysis of the presented options, however it is difficult to provide any commentary of value when considering the circular economy if the availability and readiness of product end markets is not considered.			