

# Submission to the Western Australia Waste Avoidance and Resource Recovery Strategy 2030 Consultation

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## Prioritising Used Tyre Recovery and Banning Shipment to Regional Landfills

To: Waste Authority, Department of Water and Environmental Regulation  
From: Robert Kelman, Executive Officer, Australian Tyre Recyclers Association

### Introduction

The Australian Tyre Recyclers Association (ATRA) welcomes the opportunity to comment on West Australia's Beyond Waste 2030 Strategy (Western Australian Waste Avoidance and Resource Recovery Strategy) and its Roadmap. The following submission focuses purely on issues associated with used tyre recovery and the need for reform, particularly in relation to the ongoing landfill of all classifications of used tyres in WA.

### About ATRA

ATRA ([www.atra.asn.au](http://www.atra.asn.au)) represents the interests of Australia's pre-eminent tyre recycling businesses, including promoting the benefits of tyre recovery and circular economy outcomes. ATRA public policy priorities include:

- Enforcement of regulations to benefit the environment and the legal and sustainable used tyre and conveyor collection and recycling industry.
  - Includes, compliance and enforcement of state regulations and federal export controls
- Promoting continued improvement in the recovery rates of all classifications of used tyres.
- Regulatory settings and policy processes that support the existing legal and sustainable recycling sector and that are appropriate to Australia's market settings.
- Highest order outcomes for end-of-life rubber products

### Used Tyre Recovery

Used tyres represent a significant opportunity for further resource recovery in Western Australia. While the Strategy highlights the importance of such resource recovery and the circular economy, there is a disconnect between these aspirations and the current reality in WA.

There is therefore a pressing need for regulatory reform which aligns the Strategy with actual practices in WA. Specifically tyre recovery must become a requirement, rather than the regulatory framework continuing to permit landfilling of all categories of used tyres in WA. Permissible ongoing landfilling of used tyres does not represent a long-term sustainable environmental solution for their disposal.

Industry investment in new tyre recycling facilities across WA for recovery of all tyre categories has been substantial over the past few years and this has been supported by government

funds. However, the government's permitting of landfill disposal constrains the necessary supply of used tyres which is required to make these facilities commercially viable.

## Inconsistency Between the WA Waste Strategy and Permitted Actions

1. Waste Hierarchy and Circular Economy Principles
  - The waste hierarchy embedded in the WA Strategy prioritises avoidance, reuse, and recycling over landfill disposal and energy recovery.
  - Tyres are a valuable resource for recycling into products such as road surfacing materials, playground surfaces, civil engineering applications and the emerging opportunities in tyre-to-tyre recycling. Landfilling of waste tyres is WA's and the Strategies least preferred option and undermines circular economy objectives, but this remains a legal option for tyre waste generators across WA.
  - This is despite the fact there is ample recycling capacity available across WA.
  - WA's position on landfilling used whole passenger and commercial tyres is also at odds with the rest of the country where this practice is prohibited.
2. Environmental and Economic Benefits of Resource Recovery
  - Increased recovery and recycling of tyres will reduce environmental harm, including fire risk, leachate, and vector breeding in landfills.
  - Recovery also supports Traditional Owner objectives not to leave waste in-country at mine site end of life
  - Local processing and recycling creates jobs, supports innovation (including innovation initiatives and infrastructure funded by WA and Federal grants), and it contributes to WA's "Made in WA"<sup>1</sup> and "Diversify WA"<sup>2</sup> priorities.
  - It will also make commercially viable the tyre recycling industry in WA.
3. Current Practice: Shipment to Regional Landfills
  - The ongoing practice of shipping waste tyres from the Perth landfill exclusion area to regional landfills is inconsistent with the strategy's goals of reducing landfill and supporting local resource recovery.
  - This practice undermines the business operations of tyre recyclers in WA
4. Off The Road (OTR) mine tyre disposal
  - The ongoing licencing of OTR tyre disposal in-pit is at odds with the WA waste strategy and resource recovery.
  - Used OTR tyres now have viable circular economy pathways and OTR natural rubber, in particular, is highly sought after
  - The minimal cost of OTR recovery from mines, compared to the substantial flows of revenues generated by mining companies should prompt the government to consider introducing measures which would increase the recovery of these tyres
  - Conveyor belts offer a further avenue for reform, with the aim of enhanced resource recovery
  - This material is, unlike used OTR tyres, not yet classified as controlled waste and is therefore a 'hidden' challenge
  - Conveyor material is eminently recoverable and valuable for secondary use and should be mandated for removal from the sites where it is used, instead of continuing with the current situation of on-site storage and/or dumping.

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<sup>1</sup> <https://www.wa.gov.au/government/media-statements/Cook%20Labor%20Government/%241.4-billion-investment-to-help-secure-a-future-that-is-Made-in-WA-20250619>

<sup>2</sup> <https://www.wa.gov.au/government/publications/diversify-wa-future-state>

## The Incongruity of Infrastructure Investment and Tyre Landfilling

It is important to highlight an additional significant inconsistency in WA's current approach to waste management.

The government is investing millions of dollars in new recycling infrastructure, including facilities specifically designed to process used tyres, yet it continues to permit tyres that could be recycled to be dumped in landfill, including shipments out of Perth into regional areas. ATRA has previously informed the WA government that this amounts to around 2 million tyres per year; and has sought rectification of this issue.

This practice directly contradicts the principles and priorities set out in the Beyond Waste 2030 Strategy. The strategy clearly identifies landfill as the least preferred disposal option and that it should only be used when all other avenues for recovery and recycling have been exhausted. The waste hierarchy, which underpins the strategy, places recycling and resource recovery well above landfill in terms of environmental and economic benefit. As stated above, there is also adequate existing capacity to recycle these dumped tyres, in which case landfill should be banned unless in the case of an emergency / some form of short-term natural disaster warrants it.

Allowing recyclable tyres to be landfilled not only undermines the effectiveness of new infrastructure investments but also sends a confusing signal to industry and the community. It discourages innovation, reduces the potential for job creation and perpetuates environmental risks associated with tyre disposal, such as fire hazards, leachate and loss of valuable materials.

If the government is serious about achieving its circular economy goals and maximising the return on public investment in recycling infrastructure, it must ensure that tyres suitable for recycling are no longer permitted to be landfilled. Instead, policy and enforcement should drive tyres towards recovery and recycling, supporting local industry and delivering on the strategy's commitment to avoid, recover and protect.

ATRA's previous engagement with government on this issue has also seen ATRA advocate for the cancellation of existing licences that allow dumping.

## Phase Out Onsite Disposal of Used Off The Road (OTR) Mine Tyres

Western Australia's mining sector generates a substantial volume of Off The Road (OTR) waste tyres, which are currently primarily disposed of on-site at mines across the state. This practice is increasingly at odds with the principles and targets set out in the Beyond Waste 2030 Strategy, which prioritises resource recovery and landfill avoidance.

OTR tyres are made from high-quality rubber and steel, representing a significant opportunity for material recovery and recycling including for new tyre production and true circularity. However, on-site burial or stockpiling of these tyres results in the permanent loss of valuable resources, increased environmental risks, future clean-up liabilities and missed economic opportunities for WA.

There are growing markets for micronised rubber for tyre-to-tyre recycling and OTR tyres offer particular values, with large volumes of natural rubber available for this purpose. ATRA is currently conducting fresh research/analysis associated with this OTR-circularity agenda which we intend to make available to the government once it is completed.

- Environmental Impact of OTR tyre disposal: On-site disposal of OTR tyres can lead to long-term soil and groundwater contamination, fire risk and habitat disruption. These impacts are inconsistent with the strategy's goal to protect the environment by managing waste responsibly.
- Traditional Owners are increasingly likely to oppose on site dumping and there are economic opportunities for these communities through recovery rather than burial agenda.
- Lost Resource Value: OTR tyres can be recycled into products such as road base, civil engineering materials and rubber products including for new tyre production. Their disposal on-site prevents the development of local recycling industries and the creation of jobs in regional WA, including through WA's emerging roads program.
- Circular Economy Goals: The continued on-site disposal of OTR tyres undermines WA's transition to a circular economy, where materials are kept in use for as long as possible and waste is minimised, including undermining the investments made by industry and government (through, for example, the Recycling Modernisation Fund) to process these used tyres.

There are also inconsistencies in the treatment of conveyor belts and OTR tyres in WA regulations that should be addressed. Conveyor belts are not classified as controlled wastes, unlike OTR tyres. As such, there is less oversight of this waste material and less data capture to understand the challenge and opportunities.

ATRA recommendation: The government should establish a clear timeline to phase out the on-site disposal of used OTR mine tyres. Instead, these tyres should be recovered and transported to approved recycling facilities, supporting the growth of WA's recycling sector and aligning with the waste hierarchy, circular economy principles and the government's own strategy.

Additionally, the government should align conveyor belt classifications with OTR tyre classifications.

By ending the practice of on-site disposal and promoting recovery and recycling, WA can demonstrate leadership in sustainable mining, protect its unique environment and unlock new economic opportunities for regional communities and the recycling industry more broadly. Given the rising demand for OTRs for tyre-to-tyre recycling, shifting to resource recovery will assure WA is playing its role in de-risking supply chains associated with new tyre manufacturing.

## Overall ATRA Recommendations for the WA Waste Strategy and the need for licencing and regulatory reform

1. Ban the Shipment of Waste Tyres from Perth to Regional Landfills
  - The government should introduce a ban on the transport and disposal of waste tyres from the Perth exclusion area into regional landfills.
  - This may require relinquishing existing licences and will certainly require a prioritisation of resource recovery over landfill
  - This would align with the WA 2030 Strategy
  - This measure will prevent the circumvention of metropolitan landfill restrictions and ensure tyres are processed through appropriate recovery channels.
  - This action will also align the ambitions of the WA strategy with the regulatory and licencing practices of the government and prioritise facilities that have

received funding support from the government over unsustainable dumping operations.

- Set a timeline for the phase-out of permissible OTR tyre landfilling in favour of resource recovery.
2. Invest in Tyre Recovery Infrastructure
- Continue to support the development of local tyre recycling facilities and end-markets for recycled tyre products, especially by ensuring consistent supply of material via the discontinuation of dumping as a licenced option (as outlined above).
  - The WA Roads Authority's practice of including increased volumes of rubber crumb in WA roads is helping grow the tyre recycling sector in WA and is an example for the rest of the country<sup>3</sup>.
  - The WA Roads Authority cites this initiative as implementation of the Waste Authority 2030 Strategy.
  - This demand-agenda is further justification for the government to guarantee supply via landfill bans as more WA tyres can be returned to WA roads.
3. Strengthen Compliance and Enforcement
- Enhance monitoring and enforcement to prevent illegal dumping and ensure waste tyres are managed according to best practice.
  - WA enforcement should support federal government-level export bans, albeit this policy is a federal jurisdictional issue.

## Conclusion

By prioritising used tyre recovery and banning the shipment of waste tyres to regional landfills and OTR tyre and conveyor belt disposal in-pit, WA can demonstrate leadership in circular economy practices, better protect its environment, create new economic opportunities and align its Strategy and ambitions with licenced practices in the state.

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<sup>3</sup> <https://www.mainroads.wa.gov.au/community-environment/sustainability/recycled-construction-materials/>