

**December 2025**

## **Australian Tyre Recyclers Association (ATRA) Policy Position on Tyre Management Reform**

ATRA supports used tyre recycling policy reform that delivers benefits to recyclers, the broader industry and the community and which are not detrimental to existing legitimate tyre recyclers. Any possible reform should place legal recyclers at the centre of any policy approaches and must be guided by the following principles:

### **Market-based and proportionate**

- Recognise that the overwhelming majority of Australia's used passenger, truck and bus tyres are currently legally collected and recycled, meaning that the market is generally functioning effectively (with ~97% collection rates).
- Acknowledge that perverse outcomes including dumping and stockpiling are driven by a minority of illegitimate operators contracted by waste generators (retailers, fleets, wreckers etc), handling relatively small volumes of waste compared to the legitimate recycling sector.

### **Protective of legitimate, highly invested recyclers**

- Reform must not undermine or commercially disadvantage high-performing recyclers that have invested in domestic collection, processing and recovery capacity.
- Policy settings should reinforce, not destabilise, the viability of compliant recyclers underpinning Australia's tyre recovery system.

### **Focused on the true source of the problem**

- Any reform should focus on tyre retailers and other waste generators, rather than recyclers, as their procurement choices drive non-compliance.
- Tighter and stricter enforcement of existing state and federal government regulations, including export controls, and increasing Off-The-Road (OTR) tyre recovery rates to the legitimate recycling industry should be the primary purpose of any possible reforms.

### **Low-cost, low-disruption, with minimal unintended consequences**

- ATRA favours reforms that will deliver the most effective outcomes at the lowest cost and with the fewest unintended impacts, including the introduction of landfill bans for used tyres (particularly for OTR tyres<sup>1</sup>) and strengthened enforcement of existing regulations.

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<sup>1</sup> Landfill bans via licence cancellation and state regulatory reform are still required in WA for whole passenger and commercial tyres; and in all states for OTR tyres.

- ATRA does not support any form of structural market redesign on the basis that there are far more effective, cheaper and simpler measures to achieve superior environmental outcomes and that do not undermine the existing highly functional industry.
- ATRA is supportive of additional mechanisms which are designed to enforce existing State and Federal government regulations, including measures that ensure only legitimate recyclers are permitted to operate in the market.

#### **Opposed to centralised bureaucratic market control**

- ATRA is strongly opposed to any form of centralised “single clearing-house” or bureaucratic stewardship models for the regulation of used tyres in Australia that seek to control feedstock, market pricing and/or market access.
- Such approaches risk disrupting competitive markets, undermining private investment, increasing costs and stifling innovation.
- Approaches which distort the market could also reduce the percentage of waste tyres which are currently recycled in Australia.
- Reform should preserve competition, market signals and the operational independence of recyclers in a competitive market.
- One-size-fits-all or imported mandatory schemes risk unnecessary disruption and are not directly applicable to an Australian context.

#### **Based on recycler expertise**

ATRA and its members will be central to the determination of any used tyre recovery reforms and ensure they support legitimate recyclers and improve industry, environmental and community outcomes.