



Submission to the House Standing Committee on Industry, Innovation, Science and Resources

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Inquiry into the Australian Tyre Industry

Submitted by: The Australian Tyre Recyclers Association (ATRA)

The Australian Tyre Recyclers Association (ATRA) is pleased to make the following submission to the House Committee Inquiry into Australia's tyre industry.

As this inquiry is primarily associated with used tyres and their recycling, ATRA would urge the Committee to prioritise supporting advancement of the following key issues:

- Progress the case for domestic markets for used tyre products, primarily rubber crumb and the use of this material in Australia's roads
- Focus on the most significant market-failure in the recovery of used tyres, namely the ongoing burial on site of used mine (Off The Road OTR) tyres and their low levels of recovery of just 1%-5%
- Support efforts by the legitimate industry for the Federal Government to enforce its own export controls and eradicate the ongoing illegal export of non-compliant tyre products
- Pursue options for the enforcement also of existing state regulations related to used tyre collection and recycling

About ATRA

The Australian Tyre Recyclers Association (ATRA) is the national industry body representing legal and sustainable tyre recycling companies across Australia.

ATRA members are committed to best-practice environmental management, compliance with all state and federal regulations related to used tyre collection and processing, ethical business conduct and the advancement of sustainable resource recovery and high-order outcomes from end-of-life tyres (ELTs).

ATRA advances the interests of its members including through the following priority policy areas:

- 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 controls¹
 - Continued improvement in the recovery rates of all classifications of used tyres.
 - Regulatory settings and policy processes that support the existing successful, legal and sustainable recycling sector and that are appropriate to Australia's market settings.
 - Highest order outcomes for end-of-life rubber products.
- Additional information regarding ATRA and its members is available here <https://atra.asn.au/>

ATRA MEMBER OPERATIONS

ATRA members represent the majority of the legal and sustainable used tyre recycling activity in Australia and service the entire Australian market. ATRA members recycle more than 20 Million used tyres per annum or around 400,000 tyres per week; and process these for:

- Tyre Derived Fuels (TDF) replacing coal in industrial facilities in Japan and South Korea (delivering greenhouse gas reductions)
- Rubber crumb for sports fields and other soft fall surfacing
- Rubber crumb in asphalt, and;
- The emerging markets of recovered materials for new tyre production
- Members with additional manufacturing capacity to, post processing, produce a variety of soft fall surfaces, mats and noise suppression products.

ATRA works closely with government, industry and the waste and resource recovery sector broadly to improve outcomes for its members, the environment, community and economy.

Executive Summary

Australia has a highly developed set of state and federal regulations that underpin the used tyre recycling industry. These regulations have been tightened over the past decade and make it illegal to dump used tyres or create excessive stockpiles.

Nevertheless, illegal activity does occur, and ATRA is keen to pursue additional mechanisms to eradicate dumping and stockpiling that places a burden on communities, local government, the environment and the legitimate industry. Federal export controls are also being ignored, and non-compliant material continues to be shipped offshore with an extremely poor audit and enforcement regime at this level.

The Australian tyre recycling industry is highly developed and capitalised with a legal collection rate of around 96% for passenger, truck and bus tyres; though the off the road (OTR) tyre market (mining, earthmover and agriculture sectors) demonstrate poor rates of recovery (1%-5%) and require considerable industry and government intervention for improvement.

Significant private sector capital investment has been established, and the Australian industry has capacity to process around 435,000tonne of the approximate 537,000tonne of used tyres per annum². This capacity is in excess of the existing available recycling market as OTR tyres (making up around 1/3rd of this total) are licenced to be buried on site.

¹ <https://www.dcceew.gov.au/environment/protection/waste/exports/tyres>

² https://storage.googleapis.com/tsa_craftcms_media/assets/pdf-resources/TSA0047-L8-Material-Flow-Analysis-Report-WEB.pdf - given OTR tyres generally not available to the market, the industry demonstrates excess existing capacity

Australia's used tyre products are dominated, as they are in every other developed country (including all of Europe and the US), by the production of just two primary secondary materials, tyre derived fuels and rubber crumb.

Improved domestic consumption of used tyre products would be advantageous and is likely to be driven by placing procurement obligations on end users such as roads authorities. There is some positive movement from high energy users in Australia toward utilising tyre derived fuels in their operations, and this should be encouraged.

ATRA works closely with regulators to eradicate all illegal activities and to improve the regulatory environment. The environmental and business sustainability of the tyre recycling sector is directly attributable to the regulatory landscape the legitimate industry has fought to see enacted.

The next phase of this regulatory development is to determine mechanisms that serve to enforce the existing and comprehensive state and federal laws that already govern the industry. The ongoing poor enforcement of these existing laws, that allows waste generators (retailers, fleets, wreckers etc) to contract illegal operators that then dump or stockpile tyres can and must be improved. This illegal activity undermines the legitimate industry and results in negative community, local government and community outcomes.

Additional state regulatory actions are also required including addressing the poor recovery of OTR tyres as well as banning whole tyre disposal to landfill, as continues to occur in West Australia, and landfilling of processed materials in other states.

Unlike markets such as New Zealand, British Columbia and across Europe, that had few regulations to prevent dumping and stockpiling prior to introducing product stewardship schemes, Australia's existing market is already highly regulated, capitalised, effective and successful. The used tyre recycling sector well outperforms most other waste materials in terms of recovery in Australia.

The industry will not benefit and would be placed at risk from the imposition of a new centralised bureaucracy that controlled disposal pricing and contractual terms for recyclers to see them confined to defined geographic zones (as in the NZ and EU schemes mentioned).

ATRA is concerned with all illegal activity and especially residual stockpiling and dumping that undermines community safety and amenity and places unnecessary cost and other burdens on councils and the environment. These illegal actions similarly undermine the legitimate industry.

ATRA is therefore keenly interested in assessing and developing additional market mechanisms that enforce the law. Such an approach would seek to eradicate all remaining illegal operations that stem from waste generators allowing their used tyres to be dumped or stockpiled.

This Inquiry

The House of Representatives Standing Committee on Industry, Innovation and Science will inquire into and report on the current state of the Australian tyre industry, and any challenges and opportunities for the industry within the context of a circular economy. The Terms of Reference (TOR) for this inquiry are:

1. Reviewing tyre manufacturing, distribution, importation and retail trends.

2. Investigating current practices in tyre reuse, retreading, recycling, and resource recovery, including reviewing federal, state, and local regulations governing tyre production, disposal, and recycling.
3. Exploring technological advancements in tyre design, recycling processes, and alternative materials.
4. Identifying opportunities to develop high-value uses for waste tyres and tyre-derived materials, including applications in construction, manufacturing, and other commercial sectors.
5. Evaluating the effectiveness of the existing circular economy models and identifying opportunities for research and development to support improved sustainable practices.
6. Considering the role of commercially viable product stewardship schemes and whether these should be made mandatory, and identifying infrastructure gaps in collection, processing, and recycling facilities.
7. Investigating environmental, community, and health and safety concerns related to tyre waste and recycling operations.

ATRA understands one of the key interests for the Committee is examining product stewardship options related to point 6 of the TOR and we will address this directly in our response.

ATRA Responses to the TOR

1. Manufacturing and imports

Australia no longer manufactures tyres domestically (though there remains a retreading industry that could be further supported) and relies on imports especially from the new manufacturing hubs of India, Malaysia and Asia more broadly.

As such, it is difficult for Australia to substantially influence tyre design decisions, and which are in any case based foremost around safety and reliability.

Encouragingly, there is now momentum from large tyre brands for the incorporation of recovered materials in their tyres. These emerging markets provide some indication of this emerging circular economy and presents opportunities for ATRA members and the recycling industry generally.

There are three basic categories of tyres in the Australian market, each of which makes up around one-third of the market. These are:

- Passenger and 4WD
- Truck and Bus
- Off The Road (mainly mining and agricultural sector tyres)

Tyres in many ways are an indispensable product within industrial economies. The transport of goods, services, materials, people and mining operations are all absolutely dependent on the continued consumption of tyres.

These tyres are built for reliability and safety - they are 'never-meant-to-come-apart' and they never-stop-coming to recycling yards. The recycling of these products is a daily and difficult operation and comes at a cost.

In general terms the disposal / gate fee provided by fleets and retailers (the waste generators) is the final point of income and all transport, processing and export costs come out of this income. Rubber crumb offers a variance to this as this highly processed material can generate

additional income. It is worth noting however that tens of millions of dollars in capital investment is required to process a tyre into crumb products fit for the market.

In this regard and in light of additional questions below, ATRA would be pleased to assist in facilitating visits/ study tours of tyre recycling facilities for any committee members if this were of value. Committee members gaining first-hand experience of the processes and challenges of used tyre recovery would be invaluable to this inquiry.

2. Tyre reuse, retreading, recycling and the regulatory environment

Reuse: While there is some amount of tyre reuse in Australia, this is relatively small.

Retreads: Equally, the retreading of used tyres is now confined to larger formats including bus and truck tyres, though this market is now under strong competitive pressures from cheap, lower quality, imports. While quality retreads generally outperform lower quality imports, this longevity and performance is often overlooked for the expedience of lower up-front cost.

Government procurement decisions to favour Australian manufactured retreads in bus and trucking fleets would be a useful driver for this more sustainable product.

Recycling: The vast majority of Australian used tyres are processed into a valuable fuel (Tyre Derived Fuel, TDF) for use in high energy facilities such as cement kilns and paper mills. TDF is particularly valued in cement kilns as this material replaces coal in a co-processing function whereby the TDF is consumed, effectively as an 'ingredient'.

TDF is thereby incorporated into the clinker (cement) and there is no ash from this process. Remnant steel in the TDF is utilised to replace carbon and Australia's national greenhouse accounts factor a 30% reduction in greenhouse gas emissions when TDF replaces coal in these facilities.

More information on ATRA's policy on TDF can be found here, <https://atra.asn.au/wp-content/uploads/2025/11/TDF-policy-position.pdf>

2a. The Regulatory Environment in Australia

The used tyre recycling sector is appropriately already a highly regulated industry.

As dumping and illegal stockpiling remain the most lucrative business model legislating against these practices is important and supported by ATRA and the legitimate industry.

The industry has an overlay of both State and Federal regulations that ATRA has fought strongly for over the past decade.

The economic and environmental sustainability of the used tyre collection and recycling sector is substantially driven by these state regulations. Eradicating stockpiling and dumping are prime policy positions of ATRA and its members.

Each jurisdiction differs slightly in its reporting thresholds and requirements, though generally embody the following core principles:

- EPA licences for the collection and recycling of used tyres
- Trigger volumes that require such licences generally under a few thousand tyres

- Limits within licences to the quantity of both whole and processed tyres stored on site
- Bans on the landfilling of whole used tyres
 - (Unfortunately, however WA continues to permit the landfilling of whole tyres and significant volumes are shipped out of Perth to regional landfills undermining the legitimate recycling sector)
- Strict laws regarding illegal behaviour such as dumping

These state regulations have been effectively overhauled over the past decade, and Australia thankfully no longer sees mass legal stockpiling as previously occurred at sites such as Longford (TAS), Pinkenba (QLD) or Stawell (VIC). Though unfortunately smaller scale illegal dumping and stockpiling continues to occur and places an unfair burden on local councils, communities and the environment. ATRA supports enforcement actions that seek to eradicate these practices.

ATRA is pleased to work closely with regulators to improve licencing conditions as well as report on illegal operations and drive enforcement of existing regulations.

2b. Federal regulations

There is an additional recent overlay, commencing in late 2021, in the form of export controls that require exported material to meet specifications, primarily processed to at least 150mm. Detail can be found here

<https://www.dcceew.gov.au/environment/protection/waste/exports/tyres>

ATRA was intimately involved in the development of these export regulations and remains highly supportive of them.

There however remains a problematic lack of enforcement of these regulations and Australia continues to see the export of non-compliant material.

ATRA has reported on non-compliant operators and shipments since the export bans were implemented. We remain concerned with the lack of awareness within the department as to what is going on in the market, the lack of a cohesive strategy to deal with non-compliance and the granting or renewal of licences and the ultimate lack of actual enforcement of the regulations.

As an example of the lack of an overarching strategy, there are no pre-licencing audits undertaken of an operator's actual ability to process to the required specification; there are additionally no audits of a site during a licence renewal phase or when non-compliance is reported.

ATRA has proposed to the department that audits for licencing be outsourced to the recycling industry. In this regard the Australian Council of Recycling (ACOR <https://acor.org.au/>) has received federal funding to develop an audit and compliance program working with an independent certification agency (<https://www.geca.eco/>) that could be utilised by the government for the necessary auditing framework that is currently lacking.

ATRA has attempted to make the case to the department that it would be far cheaper and more effective to audit sites for compliance and undertake spot checks in the case of non-compliance reporting, rather than undertake raids and opening containers at ports in Australia.

ATRA members are working within the legal framework adopted but are being financially and commercially undermined by continued non-compliance of federal export controls. Improved compliance is important for the federal government and the viability of the legitimate industry.

As outlined above:

- Tyre dumping is illegal
- Large scale stockpiling is illegal
- Whole baled tyre exports are now also illegal

The Australian used tyre market is already highly regulated. It is the lack of effective enforcement of the existing comprehensive suite of laws that is absent and which must be improved upon.

3. Technological advances in tyre design, recycling and recovered materials

This discussion is more appropriately responded to by manufacturers.

4. Developing high value uses for waste tyre materials

The starting point to a consideration of where we might get-to (i.e. can Australia invest in and achieve 'higher order' outcomes for used tyres) is to first consider and value where we are.

It is right to consider opportunities for higher order outcomes for used tyres, material use and even circular economy outcomes for used tyres - indeed, there are some exciting emerging opportunities for tyre to tyre manufacturing which we will outline.

But, the current state of the industry is a success story for what is an extremely difficult product to recycle.

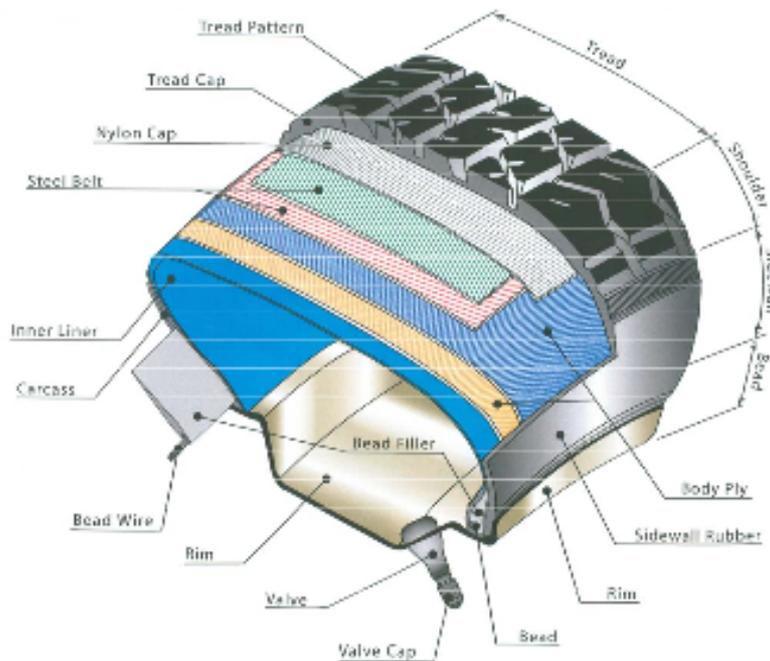
As the diagram below shows³, a tyre is a composite of natural and synthetic rubbers, nylon, steel, sulphur and around 20+ materials vulcanized together as-one.

Separating the component parts of a tyre is not simple and the global used tyre industry is effectively made up of just two secondary materials, namely;

- Tyre Derived Fuels (TDF)
- And rubber crumb, at various sizes from 180microns to 4mm in dimension

ATRA reiterates its offer to coordinate Committee member visits to ATRA member recycling operations, in any capital cities of the Committees choosing, in order that Committee members see first-hand the challenges and practices associated with tyre recycling in Australia.

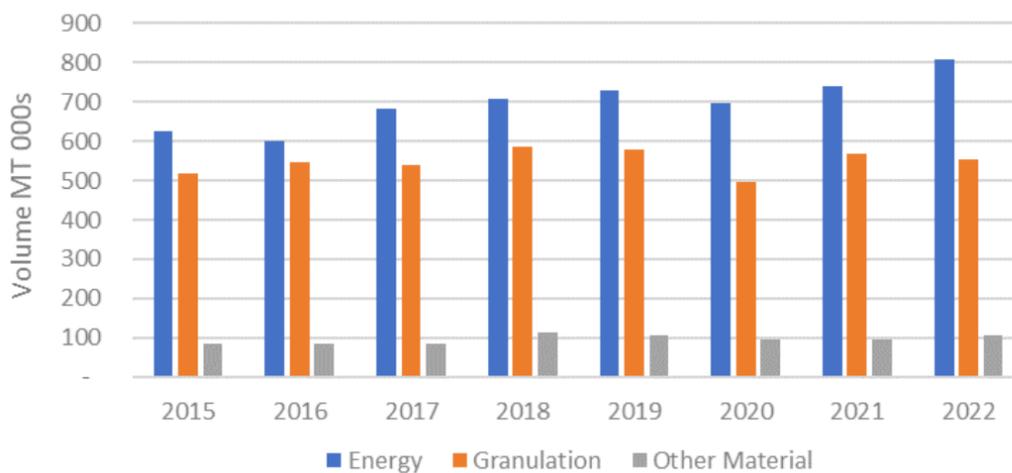
³ <https://studylib.net/doc/18366029/the-composition-of-a-tyre--typical-components>



TDF, as mentioned, is a high calorific fuel with positive greenhouse gas reduction and other benefits, especially in cement manufacturing; and rubber crumb has various applications in roads, soft fall surfaces, sports grounds and industrial adhesives.

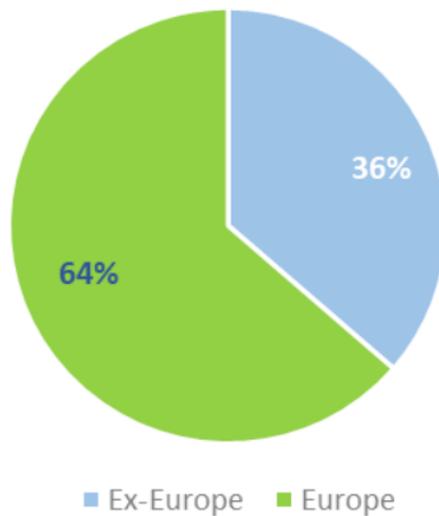
Australia’s secondary materials production profile mirrors that of Europe’s as the following table outlines. TDF for energy is the dominant offtake and crumb (granules of various sizes for various applications) is second across Europe.

Outcomes for ELTs managed by EPR Schemes in Western Europe



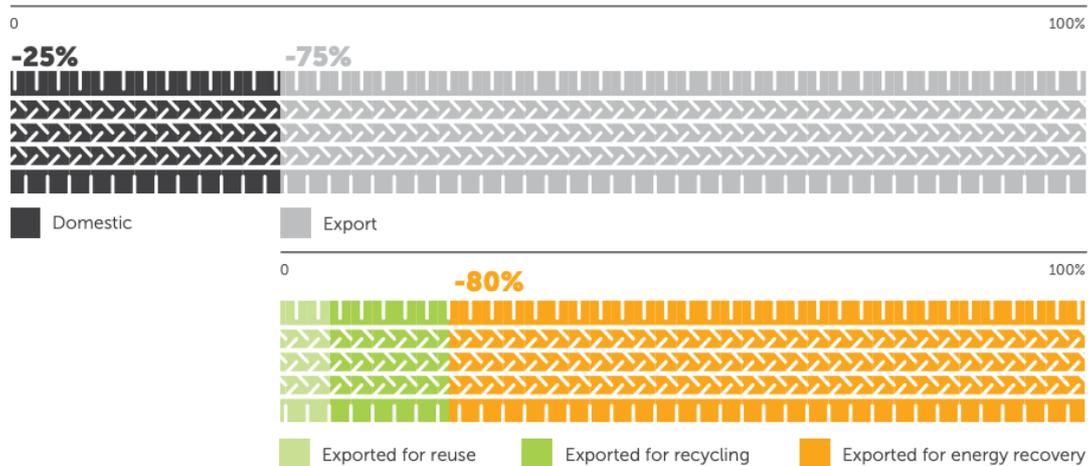
Australia differs from Europe however in end market destinations, reliant as our market is on exports rather than domestic consumption of tyre derived products. Europe in contrast consumes around 2/3rd of its production domestically with only 1/3rd (36%) exported⁴.

Management of ELTs by Destination, 2022



Australia’s market is dominated by the export of TDF, and a relatively stagnant demand profile for rubber crumb, though which could be improved.

Domestic and International Markets Percentage of Recovered Material by Weight (2023-24)



A starting point for improvements therefore is increased domestic consumption of both materials and in particular expanding the application of rubber crumb in asphalt.

Furthering domestic consumption will largely depend on road authorities and governments specifying this material into road applications and there are multiple sustainability benefits of doing so⁵. These include:

- Increased road surface durability, thereby;
- Extending the life of a pavement

⁴ Data provided independently to ATRA, source material available on request

⁵ <https://www.tyrestewardship.org.au/tools-and-resources/crumb-rubber-in-roads>

- Reduced road noise
- Lower ongoing maintenance costs

The WA roads authority is now buying increased volumes of crumb for its road network as they realise the value and embed in their own operations the increased use of this material in WA’s roads.

Emerging markets centre around growing opportunities and use of reclaimed material in the manufacture of new tyres. Most major tyre brands have now published various targets and agendas for the incorporation of recovered materials in new tyre production.

Australian used tyres and especially used OTR tyres from the mining sector can be valuably applied to this sector. This material is likely to be manufactured offshore in countries with lower manufacturing costs than Australia’s and closer to new tyre supply, i.e. Asia.

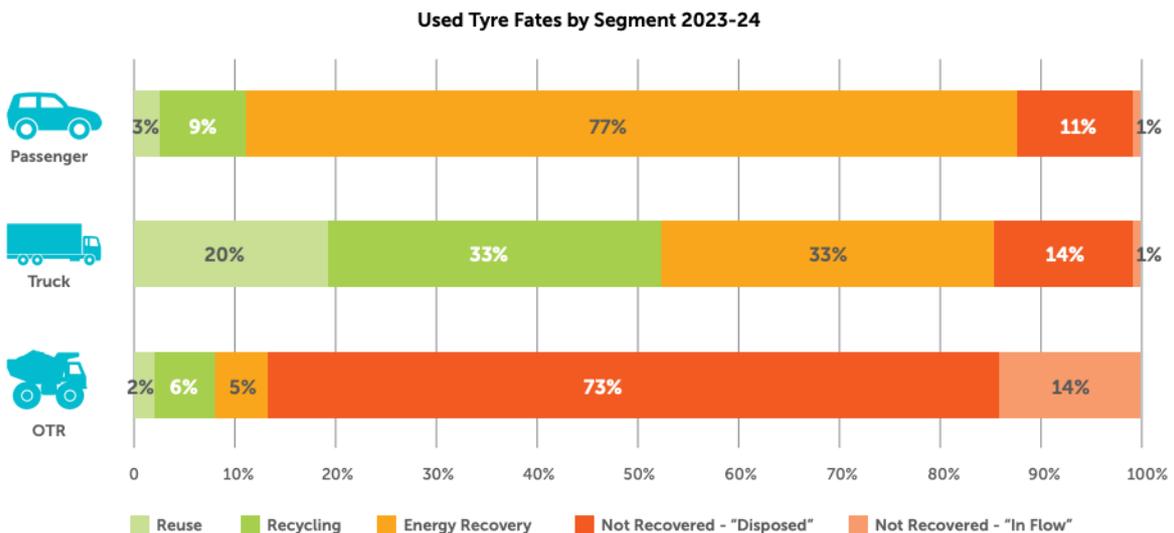
5. The effectiveness and opportunities of existing circular economy outcomes for used tyres

A critical category for the attention of this inquiry, ATRA believes, should be mechanisms to increase the recovery of tyres from the Off The Road (OTR) sector, principally mining.

Some estimates put the recovery rate of mine tyres at an extremely poor 1% though may be up to around 5%. Either way, it is the case that the vast majority of Australia’s used mining tyres are being buried onsite, rather than being recovered for a secondary use.

Recovery differences between segments

Recovery of Passenger, Truck and Bus tyres is comparatively strong, with a combined recovery rate of 87% in 2023-24, but only 13% of OTR tyres were recovered, with over 100,000 tonnes estimated to be buried in 2023-24.



There are however exciting emerging markets for end of life OTR tyres including the production either domestically or offshore of materials such as Micronised Rubber Powder (MRP), and the use of this material in new tyre production.

6. The role of commercially viable product stewardship schemes and whether these should be made mandatory, and identifying infrastructure gaps in collection, processing, and recycling facilities.

ATRA has been concerned with the notion that Australia requires a highly interventionist new regulatory regime to be applied in what is already a mature and highly functioning market.

Australia's legal collection and recycling rate for used passenger and commercial tyres is an impressive 96%-97%; though OTR tyre recovery is extremely low as states permit onsite/ in-pit disposal.

ATRA's full policy position regarding any possible federal intervention is available here <https://atra.asn.au/wp-content/uploads/2025/12/ATRA-policy-tyre-reform.pdf> and attached as appendices in this submission

A summary of this position is:

ATRA would support additional mechanisms to enforce the existing and comprehensive suite of State and Federal regulations; and that focuses efforts on the source of illegal activity, waste generators contracting non-compliant and illegal operators to more cheaply dispose of their used tyres. ATRA believes there may be mechanisms to incentivise retailers/ waste generators to only contract legal operators and we are committed to exploring these options.

ATRA is of the view there are many waste materials and their recovery markets that would greatly benefit from appropriately applied product stewardship schemes. The question must always be; what are the best regulatory interventions / tools for each waste category including given the success and maturity of the existing market.

ATRA does not support a complete overhaul of the Australian used tyre recovery market such as may have been required with the introduction of the New Zealand Tyrewise or British Columbia's market control product stewardship approach.

Both of these schemes give complete control of disposal pricing and also zonal contracting of recyclers to a central bureaucracy, often with substantial manufacturer oversight.

It's worth noting British Columbia now has just a single contracted recycler across the province as competitors have slowly been whittled down having lost contracts awarded by the central authority.

Such an imposition in Australia would place existing investments at risk as this central authority picks and chooses contractors to perform the collection and recycling tasks on its behalf.

There is a parallel here with the now highly discredited Queensland container return scheme. In this case drinks manufacturers with a primary interest in cost prevention were given 100% responsibility for the scheme's operation in a clear conflict of interest that has now been assessed by a parliamentary inquiry⁶. The inquiry committee report recommended a range of matters relating to the governance of this scheme be referred to the QLD Crime and Corruption Commission.

⁶ <https://www.parliament.qld.gov.au/Work-of-Committees/Committees/Committee-Details?cid=274&id=4505>

Prior to the introduction in New Zealand of their Extended Producer Responsibility (EPR) scheme known as Tyrewise, the country had a low 32% used tyre recovery rate⁷ and few legislative mechanisms to prevent dumping and excessive stockpiles.

Equally, European EPR models for tyre recovery were instigated decades ago as an alternate to the kinds of regulations developed, especially over the last ten years, in Australia.

Australia neither needs nor would benefit from the NZ or BC approaches as our market is entirely different and we already achieve rates of recovery European scheme achieves and which NZ is aiming at.

The Australian market at present allows for the free entry of recyclers in all markets under state's strict licencing and regulatory regimes. Recyclers compete on service and price. Flexibility (such as required during COVID market disruptions) is built into the system. There is access for new entrants and innovation in both collection and recycling outcomes that would be at risk should a central, manufacturer-led, authority be put in charge of recycling service procurement and recycling fees.

To remove this market-based approach would be detrimental and unnecessary.

ATRA though acknowledges there remain illegal activities in the market, namely remnant illegal stockpiling and dumping, that could be improved upon. ATRA acknowledges this illegal activity continues to place a burden on the environment, local governments and the community more broadly.

ATRA is committed to exploring and developing alternate mechanisms that can deliver enforcement outcomes to eradicate this illegal activity, targeting non-compliant waste generators and incentivising legal operations.

7. Environmental, community, and health and safety concerns related to tyre waste and recycling operations.

Environmental and community concerns regarding illegal dumping and stockpiling are valid and shared by all ATRA members. These actions represent a perversion of the legitimate recycling sector.

Dumping and illegal stockpiles create significant market disruption and ATRA works closely with regulators to eradicate all such illegal activity.

The community is also rightly concerned with the amenity issues, fire and vermin risks associated with this behaviour.

The enforcement of all regulations in Australia related to dumping and illegal stockpiling is a top priority for ATRA and its members.

Inquiry Recommendations:

- Strengthen enforcement of illegal dumping and stockpiling and associated existing regulations

⁷ <https://environment.govt.nz/assets/Publications/Files/waste-tyres-economic-research-report.pdf>

- Improve enforcement of federal export controls
- Focus efforts on improved domestic consumption of recovered materials
- Assess options for improvements to OTR tyre disposal and recovery, especially from the mining sector and ban landfilling of whole tyres, especially as permitted in WA
- Require all tyre recyclers to be accredited under a national compliance framework, such as ATRA's Code of Conduct and ACOR's evolving accreditation program, to ensure safe and ethical operations.
- Assess alternate mechanisms to better capture illegal operations.

Conclusion

ATRA welcomes the opportunity to contribute to this important inquiry and urges the Committee to consider these policy recommendations as part of a broader strategy to further develop the existing resilient, innovative and environmentally responsible tyre recycling industry in Australia. We remain available to provide further evidence or participate in hearings as required.

Appendices.

An example of State regulations that are applied to tyre collection and recycling. All states now legislate similar regimes.

New South Wales (NSW):

- **Protection of the Environment Operations Act 1997** governs tyre transport and disposal.
- **Licensing required** for >5 tonnes or 500 tyres.
- **IWTS tracking system** mandatory for >200kg or 20 tyres.⁸

Victoria (VIC):

- **Environment Protection Act 2017** and **Regulations 2021** classify tyres as reportable priority waste.
- Permissions required for storage >5m³.
- Strict fire safety and environmental duty obligations⁹.

Queensland (QLD):

- Governed by **Waste Reduction and Recycling Act 2011** and **Environmental Protection Regulation 2019**.
- Tyres are regulated and trackable waste (code T140).

⁸ epa.nsw.gov.au

⁹ <https://www.epa.vic.gov.au/waste-tyres>

Appendices 2

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 tyres¹⁰) and strengthened enforcement of existing regulations.
- 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

¹⁰ 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.

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.