

1 September 2026

Mr David Fraser
Chair
Tyre Stewardship Australia
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Dear David

TSA consumer research and media release

We write on behalf of the Australian Council of Recycling (ACOR) and Australian Tyre Recyclers Association (ATRA) to express our serious concern regarding TSA's recent consumer research and associated media release, *Aussies kept in the dark on old tyres — and they don't like what they suspect*.

ACOR and ATRA support effective product stewardship and measures that improve tyre recovery and recycling outcomes. However, it appears that TSA is seeking to advance its preferred policy position by publicly undermining confidence in Australia's tyre recycling sector.

The survey appears principally to demonstrate low consumer awareness about what happens to used tyres. It does not establish that tyres are generally being improperly managed, nor does it demonstrate that Australia's established passenger and commercial tyre recycling system is failing. Yet TSA's public commentary characterises consumer trust as "broken", states that consumers are "right to be sceptical" and invokes imagery of tyres being dumped in paddocks and the bush.

This is particularly concerning given the very high collection rates already achieved for passenger and commercial tyres and substantial private investment in recycling infrastructure. There are genuine challenges requiring attention, including regulatory consistency and enforcement, OTR tyres and domestic end markets. Conflating these issues with the performance of the broader recycling sector brings legitimate tyre recyclers into disrepute and damages public confidence in recycling. We are also concerned about the transparency and evidentiary basis of the research and seek clarification regarding the research objective, survey methodology, and survey report.

In particular, it is unclear how the survey findings support TSA's public characterisation that consumers are "right to be sceptical" about whether their tyres are responsibly managed, given the actual recovery performance of the sector. We also seek advice as to how the survey results on consumer awareness substantiate the policy conclusion that a mandatory stewardship scheme is required.

Our industry has sought to engage constructively with stewardship bodies to build alignment around practical reforms and productive outcomes. For example, ATRA has sought to work with TSA on the development of a fit-for-purpose stewardship model for the Australian market, including options to address free-riders and strengthen scheme design. That work has not materially progressed. Against that background, TSA has instead pursued a public communications approach which does not accurately reflect the performance of the legitimate recycling sector.

A more constructive course would be to work with recyclers and manufacturers to develop practical, agreed options for government consideration. As an organisation established to support better tyre stewardship outcomes, TSA should be strengthening confidence in responsible recycling and accurately representing the performance and challenges of the sector. Advocacy for policy reform should not come at the expense of the reputation of the recycling businesses actually collecting, processing and creating markets for Australia's used tyres.

TSA should urgently reconsider this approach and provide the industry with the underlying research materials and evidence supporting the conclusions it has publicly drawn. We would also appreciate this letter being tabled with the TSA Board at its next meeting.

Yours sincerely



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