



Industry Scheme Brochure

General Comments

The ATIC Industry Scheme Brochure gives a good overview of the industry position. However, there are several areas within the Brochure that require clarification; particularly with regard to data verification and the outcomes for the Scheme. The Association would appreciate clarity on the following areas:

1. The Tyre Product Stewardship Agreement states 17% of tyres went to an end market, the Brochure mentions 25%; it is not clear where the 25% recycling figures come from, given both documents reference the URS study.
2. The aim of the Scheme is to achieve 90% recovery of tyres within ten years. There appears to be no clear basis for this conclusion and no indication of exactly which markets the figure is aimed at. This item is further discussed in MWAC Submission – Overall.
3. Many Local Governments are familiar with the 'Environmental Levy', particularly non-metro areas, where it has been observed that often this levy is collected and the tyres are then disposed into the Council landfill (free of charge). The prospect of an additional fee without a guaranteed decrease or removal of the existing fee would seem like doubling up. If the Scheme is not able to operate successfully in all areas, this consideration needs to be incorporated fully into the proposed Product Stewardship Scheme.

WALGA Recommendation 1: That the Environmental Levy cease once the Scheme comes into force.

WALGA Recommendation 2: If a transport subsidiary is necessary for those within the tyre industry to ensure tyres are taken to market; this is incorporated within the Scheme.

4. One of the users of Tyre Derived Products (TDP) was identified as, local authorities involved in road maintenance; there are potential barriers to this, such as Main Roads specifications. The Association has been working with Main Roads and local government to facilitate such applications, but any inroads into this market will take substantial work. Talks have been held with all States and Territories except WA, this information is not however mentioned in the brochure, the only mention of this is in the Financial and Economic Analysis of the Proposed Used Tyre Product Stewardship Scheme URS 2005¹

¹ Financial and Economic Analysis of the Proposed Used Tyre Product Stewardship Scheme. URS 2005

5. The 'Overall benefits to the Community' section is ambiguous in the way it is expressed. Specifically:
 - It is unclear as to what type of energy will be utilised more efficiently in the first dot point;
 - The dictionary definition of the term 'dumping' does not necessarily mean illegal, however, the term 'illegal dumping' is predominantly used. The confusion of adding in legal dumping is unhelpful; and
 - The comments regarding mosquitoes and larvae is grammatically incorrect, the statement currently implies the breeding grounds are hazardous for the mosquitoes and larvae.