



WESTERN AUSTRALIAN
LOCAL GOVERNMENT ASSOCIATION

WALGA Submission Review of Management of Used Tyres at Landfill Sites and Report for Review of Management and Operation of Used Tyre Stockpiles and Stockpile Guidelines

Status of this submission

This submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (the Association). The Municipal Waste Advisory Council is a standing committee of the WA Local Government Association with delegated authority to represent the Association in all matters relating to solid waste management.

In addition to general consultation, MWAC held a workshop open to all Local Government representatives to elicit direct feedback on the Investigation. The workshop was attended by 33 Local Government representatives (16 metropolitan and 10 non-metropolitan and 7 Regional Government representatives). Discussion from the workshop is the primary driver for this submission.

Summary

This submission is divided into three parts. The first part identifies issues that the Association considers are relevant to both papers; and to the general management of used tyres in Western Australia. The second and third parts of the submission specifically respond to comments and recommendations made in the papers 'Review of Management of Used Tyres at Landfill Sites' and 'Report for Review of Management and Operation of Used Tyre Stockpiles and Stockpile Guidelines' respectively.

In summary, it is not considered that the papers adequately address the potential negative issues associated with the establishment of tyre stockpiles or the introduction of compulsory baling and burying of tyres in monofill. As such, the Association does not support the introduction of the stockpile guidelines or the tyre landfill management guidelines until the issues of market development and sustainability; environmental and social impacts of stockpiles; producer responsibility; economic and operational support; and enforcement have been appropriately resolved in consultation with stakeholders.

WALGA Recommendations

WALGA Recommendation 1: That current and future Board papers on tyres be reviewed for consistency of information and policy. In particular –

1. A consistent policy on tyre leachate be developed and implemented; and
2. Equivalent Passenger Units (EPU) be adopted as the standard unit of measure for tyre discussion papers.

WALGA Recommendation 2: That the draft guidelines for managing tyres at landfill and for stockpiling tyres not be introduced until used tyres markets are identified and initiated.

WALGA Recommendation 3: That the State Government investigate appropriate mechanisms for minimising the risk of tyres being stockpiled for indefinite periods with no identified market.

WALGA Recommendation 4: That a range of Extended Producer Responsibility (EPR) schemes be investigated as potential options to make the importer and/or manufacturer of a tyre responsible for ensuring the collection, transport and re-processing of that product; and such schemes are introduced as considered appropriate.

WALGA Recommendation 5: That a comparison of the positive and negative impacts of stockpiling tyres be investigated on a situation-by-situation basis; and that stockpiling only be implemented where net-benefits are evident.

WALGA Recommendation 6: That the Guidelines for the Management of Used Tyres at Landfill Sites be removed from the report; amended to focus on operational issues particularly associated with the management of tyres at landfills; and issued as a stand-alone draft document for comment.

WALGA Recommendation 7: That the amended Guidelines for the Management of Used Tyres at Landfill Sites only be introduced to support proven market opportunities; and that full economic and practical support be provided for their implementation.

WALGA Recommendation 8: That a suite of measures for controlling the illegal dumping of tyres be investigated and implemented as appropriate prior to the introduction of the Guidelines.

WALGA Recommendation 9: That the Stockpile Guidelines be removed from the report; amended to reflect stockpiles are only acceptable as a short-term option; and issued as a stand-alone draft document for comment.

WALGA Recommendation 10: That the amended Stockpile Guidelines only be introduced to support proven market opportunities; and that full economic and practical support be provided for their implementation.

Part 1: General Issues with Tyre Management

1.1 The Information Presented on Tyres

The Waste Management Board (the Board) has recently released four different papers on used tyre management and markets (from three different consultants). The information presented through these reports has contained some contradictions; making it difficult to reach overarching conclusions on the recommendations made.

1.1.1. Tyre Leachate

A clear example of this issue comes through the presentation of tyre leachate risks in the documents. Participants at the workshop expressed a great deal of confusion over whether tyres were in fact considered inert and how this affected their management. For example –

- The draft guidelines for managing tyres at landfill state that ‘for an inert material such as whole tyres, a liner consisting of the sub-base and clay layer is sufficient’. Yet the same document has three pages on the toxicity of tyre leachate and factors that may affect the rate and/or concentration of leaching.
- The document investigating the impacts of banning tyres from landfill presents the use of whole and cut tyres for engineering and habitat creation (artificial reefs, marron farms) as acceptable end-uses for tyres whilst also presenting tyre leachate as an environmental risk of landfill.
- Finally, not a single one of the four documents addresses the potential for leaching from tyre crumb used in applications like roads and playgrounds or from blasting. If tyres are not considered inert, then there must surely be some risk of leachate from these applications.

The Association does not have a consolidated view point on whether tyres are inert. However, it is considered that this is an issue that the Board must develop a policy for expeditiously if used tyres are to be consistently and appropriately managed.

1.1.2. Waste Tyre Volumes

There are contradictions between the documents in the volumes of used tyres identified and the unit of measure used to represent these volumes. Whole numbers, kilograms, tonnes and equivalent passenger units (EPU) are used interchangeably within and between the documents.

The lack of consistency in figures and units makes it very difficult to try and create a complete picture of used tyre management and markets in Western Australia from the documents. For example, it is only in the paper on tyre technology and markets it becomes clear that in WA annually, 44% of the tyre EPU is disposed of in the Perth region, 31% in the South West and 25% in the Pilbara. This is significant knowledge in terms of the tyre recycling picture, as it clarifies if a scheme is to be effective, it can't be focused solely on the Perth region. The papers prior to the paper on markets and technology did not convey this picture, as they used whole tyres as their primary unit of measure. It is considered that to streamline future discussions and consultations on used tyres, EPU should be used as the standard unit of measure as this best represents the potentially recoverable resource contained within each tyre.

WALGA Recommendation 1: That current and future Board papers on tyres be reviewed for consistency of information and policy. In particular –

- 1. A consistent policy on tyre leachate be developed and implemented; and**
- 2. EPU be adopted as the standard unit of measure for tyre discussion papers.**

1.2. The Establishment of Tyre Markets

It is considered that the primary drive to recycle tyres has been a desire to recover the energy put into the manufacture of tyres rather than a real market need. Local Government supports the intention to recover the potential resources bound within a used tyre. However, previous experience has shown that recycling programmes are difficult to sustain unless markets drive demand for a product. It is acknowledged that the National Stewardship Scheme should theoretically help drive such markets; but it is considered there are a number of remaining issues that need to be addressed in regard to the development and sustainability of used tyre markets.

- There is a particular concern that the National Tyre Stewardship Scheme is very similar to the National Used Oil Collection Infrastructure Scheme and may therefore suffer from the same issues. That is, used oil is successfully being collected, but a lack of markets has left some Local Governments with oil stockpiles they can't dispose of. It is unclear how the National Tyre Stewardship Scheme would avoid the same situation arising if tyre markets failed (or failed to emerge).
- There is also concern that the National Scheme must adequately include Western Australia. Some Local Government representatives at the workshop raised the issue that, whilst the Chemclear programme theoretically includes Australia-wide chemical collections, a number of locations in rural WA had been skipped for the last couple of years. This has left some Local Governments in the undesirable situation of having to stockpile chemicals for indefinite periods.

There is also a high level of concern amongst Local Government in regard to the substantial financial outlay for infrastructure, site remediation and labour that would be required to implement the draft guidelines for tyre management at landfill and stockpiles. It is questioned whether this outlay can be justified to support markets that may or may not emerge in the future. Beyond these economic questions, there is even greater concern in regard to the environmental and social risks that are associated with the development of tyre stockpiles. It is not considered that the papers fully present the extent of these risks and this issue is discussed in more depth later in the submission.

It was the consolidated opinion of the workshop participants that, whilst Local Government is willing to work with the State and Federal Governments and industry to manage used tyres, they are unwilling to take on the financial, environmental and social risks associated with draft landfill management and stockpiling guidelines in the current context. This was considered an issue of particular pertinence in regard to the potential risks associated with stockpiling tyres. The opinion of Local Government is –

- The draft guidelines should not be implemented until firm markets are established and guidance can be provided on the volumes of used tyres likely to be dealt with; at what regularity; and at what location. That is, Local Government, and private operations, should not be expected to take-on the real and significant risks of

implementing the draft guidelines without an assurance that a ready market is available for those tyres.

- It is acknowledged that industry arguments exist for having an assured supply of tyres. However, it is estimated that approximately 15,000 tyres are already stored in monofill bales at Brookton landfill site alone. Further, all tyres in the tyre landfill exclusion zone (TLEZ) are voluntarily baled and stored in monofills; adding to the available supply. It is suggested that this supply of tyres be used as the seed supply to establish firm markets prior to the introduction of the Guidelines.
- Emergency plans must be developed to avert stockpiling issues, such as those currently occurring with used oil, in the event of future market failure. These risks may be managed through the use of Extended Producer Responsibility (EPR) schemes, which are discussed in more detail below, or through the State underwriting the tyre collection process. Local Government favours the introduction of an appropriate EPR scheme to manage this issue.

WALGA Recommendation 2: That the draft guidelines for managing tyres at landfill and for stockpiling tyres not be introduced until used tyres markets are identified and initiated.

WALGA Recommendation 3: That the State Government investigate appropriate mechanisms for minimising the risk of tyres being stockpiled for indefinite periods with no identified market.

1.3. Extended Producer Responsibility

The Association's understanding of the National Tyre Stewardship Scheme is that it will act to promote markets for tyre derived products through providing a benefit payment to the end-user of the product and through market development, research, management of historical stocks, and support for remote and rural schemes. However, the scheme does not require the tyre industry to take any direct responsibility for the collection, transport and re-processing of used tyres. Local Government considers this lack of responsibility a potentially huge problem, in that it assumes markets will develop and flourish for used tyres. This type of assumption has proved faulty in Western Australia for the national used oil scheme and the collection of glass through kerbside.

It is the considered opinion of Local Government that the best (and perhaps only) means of assuring markets for used tyre products is through the introduction of an EPR scheme under which the importer and manufacturer (or retailer) of a tyre retains responsibility for guaranteeing appropriate avenues exist for the transport and re-processing (or final disposal) of that product.

- The Tyre Industry does not seem to have any difficulty in transporting new tyres to retail outlets. It would therefore seem a reasonable and practical option to engage that same transport system in the back-loading of used tyres to an appropriate storage or re-processing facility. As a minimum, it is considered that the option of using tyre retailers as collection points and harnessing existing tyre transport networks should be investigated as an option. The current tyre reports fail to do this.
- DrumMUSTER is put forward as a well planned EPR scheme that could be used as the basis for a similar-type scheme for tyres. The majority of Local Governments are

happy to be involved with drumMUSTER-like schemes. The reasons given for supporting this type of scheme were that it is funded and managed through an industry levy; clear standards, a procedures/operational manual and training are provided; infrastructure is established at industry cost; operators are reimbursed for the administrative costs of running the scheme; and, most importantly, industry takes responsibility for the collection and transport of the product to the re-processor.

- It is acknowledged that drumMUSTER is a national scheme and that, therefore, there may be federal restrictions on introducing a similar type of scheme at a state-based level for tyres. Never-the-less, Local Government is overwhelmingly of the opinion that this type of EPR scheme must be investigated and implemented in a way that does not conflict with Federal regulations. The implementation of this type of scheme at the State level (where no similar Federal scheme is forthcoming) is considered necessary as a matter of urgency for a variety of waste products, including used tyres.

WALGA Recommendation 4: That a range of Extended Producer Responsibility (EPR) schemes be investigated as potential options to make the importer and/or manufacturer of a tyre responsible for ensuring the collection, transport and re-processing of that product; and that such schemes are introduced as considered appropriate.

1.4. Hazards and Risks Associated with Stockpiles

It is considered that the hazards and risks associated with tyre stockpiles are significantly higher than those associated with tyre landfills. Neither the paper on tyre stockpiles nor the paper on tyre landfill management (which incorporates the need for stockpiles to be used to make baling tyres economically viable) fully explores this issue. These risks are discussed in more detail later in the document in Part 3 'Assessment of Hazards and Risks'. However, in particular, tyres stockpiled above ground are considered to have a far greater risk of tyre fires and acting as a breeding ground for mosquitoes, which is a significant hazard in areas with Dengue Fever and Ross River Virus.

There was also concern expressed that if no economic market eventuates for tyres and the stockpile guidelines are too onerous, present and potential providers of services may abandon the industry. This could result in unmonitored stockpiles and exacerbate the environmental and social risks presented by tyre stockpiles.

Local Government considers that the increased risks associated with stockpiles are significant enough to limit endorsement of their development unless clear objectives are established for the stockpile and definite and readily available markets are established to minimise stockpiling time. It is considered that before a stockpile is established –

- The re-processor must first identify funding and markets, set out a market development plan, and initiate the building of the plant; then
- When a clear market is established, stockpiles can be established in preparation for the market according to a reasonable timeframe.
 - For example, Local Government has demonstrated a willingness to initiate stockpiling tyres in the Pilbara Region. However, this agreement has come as a result of TPA-Australasia initiating the development of a tyre re-

processing plant specifically to deal with used tyres generated in the Pilbara. Providing the TPA re-processing plant (or an alternative re-processor) is able to provide a continuous market for Pilbara used tyres, stockpiling of those tyres is considered a reasonable action.

- In the instance of tyres being stockpiled for future baling and monofilling, further investigation and evidence is required to demonstrate that the environmental and social risks associated with the stockpile do not outweigh the benefits of a possible future market. It is considered that in regions where population centres are small and wide spread, stockpiling tyres for extended periods for later baling (with a shared regional baler) and monofilling is unlikely to be acceptable.

WALGA Recommendation 5: That a comparison of the positive and negative impacts of stockpiling tyres be investigated on a situation-by-situation basis; and that stockpiling only be implemented where net-benefits are evident.

Part 2: Review of ‘Management of Used Tyres at Landfill Sites’

2.1. Structure and Content of the Report

It is agreed that the baling of tyres in monofills does increase the possibility of economically recovering tyres for re-processing in the future. However, the Association is far from convinced that the investment and the potential negative impacts associated with this process are justified by the report. In particular, the Association vigorously rejects the report recommendation to implement the draft Guidelines as a default position, best practice instrument applied retrospectively State-wide to all landfills receiving tyres.

The report itself identifies several issues that could detract from the implementation of tyre monofill Guidelines; and presents recommendations for addressing these issues. Local Government does not consider the report adequately deals with these issues and that each remains a significant reason for not implementing the Guidelines; particularly not on a State-wide basis. These issues, and the report recommendations for dealing with them, are addressed below.

See WALGA Recommendation 5

2.2. Structure and Content of the Guidelines

Notwithstanding any of the additional issues addressed below, the draft Guidelines for the Management of Used Tyres at Landfill Sites are considered very poorly developed. Very little effort seems to have been put in to making the document useable on an operational level. The Guidelines are not indexed (despite being 30 pages long), numbered or clearly broken into headed sections; and no tables and few diagrams are used to highlight relevant technical information. However, towards the end of the third page, it is indicated that tyre monofills will be licensed as Class 1 inert landfills. If that is the case, it is suggested that this information be presented at the start of the Guidelines and operators be instructed to refer to existing Class 1 Guidelines for general guidance rather than attempting to replicate this information in these Guidelines.

It is considered that the Guidelines should be removed from this report; amended to rather focus on operational issues particularly associated with the management of tyres

at landfills; and issued as a stand-alone draft document for comment. Further, it is considered that the amended Guidelines should only be applied to support proven market opportunities; and then only when full industry (or State and Federal) economic and practical support structures are established through EPR schemes.

WALGA Recommendation 6: That the Guidelines for the Management of Used Tyres at Landfill Sites be removed from the report; amended to focus on operational issues particularly associated with the management of tyres at landfills; and issued as a stand-alone draft document for comment.

WALGA Recommendation 7: That the amended Guidelines for the Management of Used Tyres at Landfill Sites only be introduced to support proven market opportunities; and that full economic and practical support be provided for their implementation.

2.3. Report Issues and Recommendations

Issue 1: Lack of enforcement leading to illegal dumping/stockpiling

Report Recommendation 1: Estimate the proportion of unaccounted for tyres by checking the transport information from the Controlled Waste Tracking System against landfill data and sales data, if not already available under the licence conditions for tyre retailers. Consider developing a requirement for tyre retailers to demonstrate proper disposal of used tyres.

The lack of information available on tyre disposal indicates that the current tracking system is not operating effectively. If the report recommendation was to effectively address the issue of illegally dumping, then extensive strengthening and increased enforcement of the tracking system would be required.

- The costs of such a system would be unavoidably high. Before its implementation, the State would have to consider if the costs of such a scheme are balanced against the benefits of improved tyre management.

If the cost of disposing tyres to landfill is increased through the measures suggested in the Guidelines, then increased illegal dumping is almost certain to follow. This is considered an extremely serious repercussion of the Guidelines that is largely brushed over. The recommendation suggested in the report fails to address the issue. As such, the issue of how illegal dumping might be controlled remains a problem that requires serious consideration before the Guidelines are implemented.

- It is suggested by Local Government that the most effective way of discouraging illegal dumping is the provision of a cost-effective alternative. In the case of tyres, an increase in illegal dumping is only likely to be averted by ensuring the cost of delivering tyres to a re-processor remains less than the current cost of disposing of a tyre to landfill. Illegal dumping is only likely to be reduced as the cost of delivering a tyre to a re-processor (or a landfill) is reduced. In essence, this means that market development must precede the introduction of the Guidelines.
- It is also considered that an education programme is an essential secondary measure to reduce illegal disposal. Evidence suggests at least some illegal tyre

disposal is the result of ignorance of the alternatives and ignorance of the impacts of the action. An education programme could be effective in reducing this aspect of illegal disposal. Such a scheme is likely to be most effective if driven through the national peak tyre bodies to ensure a consistent national message. Moneys from the National Tyre Stewardship Scheme are a possible source of funding for such a scheme.

WALGA Recommendation 8: That a suite of measures for controlling the illegal dumping of tyres be investigated and implemented as appropriate prior to the introduction of the Guidelines.

Issue 2: Lack of infrastructure for baling

Recommendation 2: Encourage Shires to consolidate their tyre facilities so that one tyre landfill is established for each region. Tyres could be transported loose to this site and baled before monofilling. Consider assisting councils to jointly purchase mobile balers that can be kept in the region but moved between sites and/or based at the common landfill site.

This recommendation represents a significant investment on the part of Local Government, even if facilities are regionalised. The report lacks consideration of the fact that, even with support for the purchase of a baler (estimate \$250,000), there is the cost of site development (stockpile and monofill sites), maintenance, labour, and the (often significant) transport distance between sites. A number of low population districts (Manjimup has presented itself as an example) have raised concerns that their regional rate base is simply not sufficient to cover the ongoing infrastructure, transport and labour costs of the proposed scheme. Certainly most Local Governments, particularly in the non-metropolitan regions, would be very hesitant to make such an investment unless the viability of future tyre markets was better established.

It is questioned why Local Government should be expected to bear the costs for this scheme in any case. As discussed under Part 1 of this submission, Local Government is willing to work with the State and Federal Governments and industry to improve the viability of tyre re-processing, on the condition that it is the tyre industry that takes the primary responsibility for the management of used tyres. It is considered the tyre industry has a clear responsibility to manage used tyres over and above the role established through the National Tyre Stewardship. Local Government would generally be willing to operate as a collection agent for used tyres providing adequate support structures for the scheme are identified and provided for the life of the program.

See WALGA Recommendation 4

Issue 3: Need to store tyres above ground until sufficient quantities are generated for baling.

Recommendation 3: Allow sites to store up to 5,000 tyres for baling using the stockpile guideline prepared by GHD for the Department.

It is considered the storage of up to 5,000 tyres for baling above ground represents a significant increase in environmental and social risks in comparison to landfill. In particular the increased risk of disease and tyre fires need to be considered greater detail. The report fails to adequately compare these risks against the potential benefits of baling and monofilling for future tyre recovery. This issue is discussed in more detail under Part 1 'Hazards and Risks Associated with Stockpiles'.

See WALGA Recommendation 5

Issue 4: Extra costs for baling before monofilling

Recommendation 4: Consider funding for the purchase of balers and establishment of above ground storage facilities

➤ This is discussed under issue and recommendation 2.

Issue 5: Baling not feasible for larger tyres.

Recommendation 5: Mine sites should be required to have tyre management plans that ensure a maximum recovery of tyres in the future through monofilling with survey and GIS mapping. At tyre monofills oversize tyres should be compressed through baling where possible or otherwise stacked in a cell to an equivalent height of stacked bales.

➤ Local Government has no issue with this recommendation.

Part 3: Report for Review of Management and Operation of Used Tyre Stockpiles and Stockpile Guidelines

3.1. Structure and Content of the Report

The general structure of this report is considered better than the report on Tyre Landfill Management in that it is appropriately indexed and divided into obvious numbered sections. However, the workshop raised two significant issues with the content of the report.

3.1.1. Assessment of Hazards and Risks

The first issue is that, in providing an overview of potential hazards and risks of above ground tyre storage, it is considered that some risks were seriously understated or omitted from the report. It is considered that the risks associated with tyre stockpiles are significant enough for Local Government to conclude that

tyres should not be stockpiled except in the very short-term. The reason for the stockpile must be clear and the final destination of the tyre known and readily available. This is discussed in more detail in Part 1 of the Submission.

The most significant of the risks omitted or underestimated in the report are considered to be –

- The risk of disease. Dengue fever in the north and Ross River fever in the south are major mosquito borne diseases that could be associated with the stockpiling of tyres. The difficulty of mitigating the mosquito risk is not given full consideration.
- The risk of tyre fire. In particular, greater consideration needs to be given to the likelihood of tyre stockpiles being deliberately lit by vandals; and the capability of Local Emergency Services to deal with the hazards associated with an above ground tyre fire.
- The risk of stockpiles becoming economically unsustainable and potentially being abandoned if tyre markets do not emerge. The cost of closing and remediation a tyre stockpile is dismissed in the report as being 'minimal if the site is managed properly'. However, the cost of first setting up a stockpile, combined with the cost of disposing of tyres to a monofill (if markets do not emerge), is in fact likely to be a significant financial imposition on an operator. Local Government would certainly require some form of State or industry underwriting of a stockpile to mitigate this financial risk.
- The lack of consideration for the potential loss of centrally located land for the purpose of stockpile development; and the potential increase in heavy traffic delivering tyres to a stockpile and collecting tyres for re-processing.
- The lack of consideration in the report for the potentially significant environmental risk created from the movement of tyres that may contain odours and pathogens to a stockpile. For instance, tyres that have previously been used for engineering purposes in a retaining wall or leach drain have the potential to carry serious contamination to the stockpile. This presents a health and safety issue for workers handling the tyres and a potentially significant risk of highly polluted run-off entering the stockpile environment.
- The lack of consideration for the risk of a significant cost burden being placed on Local Government for the enforcement of these Guidelines. In particular, it is considered that the report fails to address the likely financial impacts of attempting to enforce compliance at existing 'unofficial' stockpiles, such as might be found at farms or old quarries etc.

3.1.2. Issues Impeding the Implementation of the Guidelines

The report also openly raises a number of serious issues that are likely to impede the successful and safe implementation of the Guidelines. Local Government fully agrees with the report's analysis of these issues, and considers that in some instances the report underestimates the seriousness of the problem. However, the report provides no suggestions for how these issues might be dealt with or even minimised.

As such, it is considered that the Guidelines are clearly not suitable for introduction until the issues raised have been addressed. Local Government considers that these issues can largely be dealt with if the Guidelines are supported by a combination of readily available, established markets, appropriate EPR schemes, and ongoing education programmes. These suggestions are discussed in more detail in part 1 of the submission.

See WALGA Recommendation 4 and 5

3.2 Particular Issues with guidelines

Notwithstanding any of the additional issues addressed above, the draft Guidelines are considered poorly developed. They lack detail in some sections, such as an explanation of costs and operational guidelines; and are overly prescriptive in others, such as the smoking prohibition distances. A number of specific issues were raised at the workshop including–

- The Guidelines treat tyres as if 1 tyre is equal to 1 equivalent passenger unit (EPU). However, storing over 5000 passenger tyres is clearly not the same as storing 5000 Off-the-road (OTR) tyres. It is considered EPU should be used across the board to avoid confusion;
- The Guidelines do not differentiate between storing different types of tyres;
- The Guidelines do not address worker Health and Safety sufficiently;
- The Guidelines do not provide sufficient operational guidance;
- The Guidelines do not provide consideration for costs such as infrastructure or labour; and
- No consideration is given for the possible eventuality of potential market failure in the used tyre market.

It is considered that the Guidelines need to be amended and released as a full, stand alone document for comment. Further, it is considered that they should be drafted in the context of acting as a temporary storage area for established markets. That is, the Guidelines should reflect the risk-minimisation imperative that stockpiling is only acceptable as a short-term option to supply available used tyre markets.

WALGA Recommendation 9: That the Stockpile Guidelines be removed from the report; amended to reflect stockpiles are only acceptable as a short-term option; and issued as a stand-alone draft document for comment.

WALGA Recommendation 10: That the amended Stockpile Guidelines only be introduced to support proven market opportunities; and that full economic and practical support be provided for their implementation.