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**Storage of waste tyres – regulatory impact statement**

Policy and Regulation Unit  
EPA Victoria  
GPO Box 4395  
Melbourne Victoria 3001

Dear Derek,

**Sustainability Victoria's comment on the 'Storage of waste tyres – regulatory impact statement'**

Sustainability Victoria welcomes the opportunity to comment on the Storage of waste tyres – regulatory impact statement (the RIS).

SV has worked closely with our environment portfolio partners, the EPA and the Department of Environment and Primary Industries (DEPI), on the development of regulations pertaining to improving the safe management of end-of-life (EOL) tyres, including preparatory work and direct input into the draft RIS.

SV is supportive of the approach, rationale and recommended outcomes of the RIS and sees this regulatory framework as vital to supporting a robust market for EOL tyres in Victoria.

In collaboration with our portfolio partners, SV is working to facilitate strengthened markets for tyre derived products (TDP) by partnering with Tyre Stewardship Australia to improve communications to enhance responsible procurement for tyre recycling services. This includes engaging all points of the supply chain to identify barriers and work collaboratively to overcome these barriers, including but not limited to those that inhibit the increased use of crumbed tyre rubber in asphalt.

The intent of this approach is to support a market pull for tyres away from stockpiling as an end point through the creation of value for tyre derived products by increasing demand via new and expanded local markets.

The product stewardship approach SV is taking to improve market conditions for TDP could not possibly succeed without the underpinning of the regulatory framework proposed by this RIS. Without a strong regulatory framework to create a baseline for the safe management of EOL tyres, legitimate handlers and processors who incur more costs through processing and adherence to standards would continue to be undercut by unscrupulous operators that avoid the overheads associated with safe processing and management of EOL tyres.

SV, DEPI and the EPA have worked closely within the portfolio to coordinate better EOL tyre management practices and market conditions using strategic, regulatory and market oriented initiatives. While this work to date is in its infancy, the ongoing safe management of EOL tyres is predicated on strong local market conditions

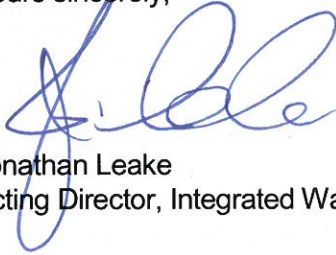


that are underpinned by a regulatory 'baseline' for the safe management of EOL tyres.

SV is therefore fully supportive of the recommendations proposed in the RIS as the most cost effective, targeted and administratively efficient regulatory tools available to mitigate the risk of environmental and human harm caused by fire through inadequate tyre stockpiling methods, whilst acting to support legitimate handlers and processors in Victoria's tyre recycling industry.

If you have any queries regarding this letter or SV's activities in relation to tyres, please contact Liam O'Keefe on 8626 8870.

Yours sincerely,



Jonathan Leake  
Acting Director, Integrated Waste Management