



# ATRA

Policy & Regulation Unit  
Environment Protection Authority  
Victoria  
By email: wastetyresRIS@epa.vic.gov.au

31 October 2014

Dear Sirs

**Re: ATRA response to Victorian waste tyre RIS**

Thank you for the opportunity to respond to the draft regulations outlined in the used tyre Regulatory Impact Statement (RIS).

In broad terms, ATRA members support tighter regulations relating to the collection, storage and processing of end of life tyres. Unsafe and unethical tyre collectors / processors that avoid legitimate business costs, associated with public health and safety, and undercut on price are the greatest threat to the legitimate industry and the environment.

In this regard, ATRA believes the Victorian regulations are a meaningful and welcome first step. We look forward to continuing to work with the Victorian government, EPA and SV to help implement the existing regulations, strengthen the regime and support market development.

ATRA (the Australian Tyre Recyclers Association) represents the legal, safe and ethical tyre recycling industry in Australia. We estimate that our members cover between 60-70% of the market. All ATRA members are audited against all specific legal requirements in their particular state as well as ATRA's additional standards. This audit process is undertaken by an independent / third party firm (Equilibrium OMG) reconciling monthly data, satellite surveillance and annual unannounced site inspections.

The introduction in Victoria of a regulatory regime should go a long way in fixing the used tyre collection industry and levelling the playing field for ATRA members who have invested millions of dollars in appropriate fire safety and other equipment, reprocessing machinery as well as insurances, worker safety regimes, undercover storage, market development etc.

ATRA would suggest the following approaches would further strengthen the Victorian regulations:

- That the 5000 EPU threshold for works approval and an EPA licence should be lowered to immediately match NSW at 500 units. There are very few retailers that would hold anything near 5000 EPU's and additional / more regular collection runs would alleviate this problem, at no extra cost to those retailers. Similarly, local government regional consolidation points would also benefit from more frequent collection arrangements.



- We are also concerned that the RIS takes no account of the issue of stockpiling – i.e. that an operator may still be allowed to stockpile large quantities of used tyres and not process these units. It is an historic reality that many existing stockpiles have come about as a result of rogue operators leasing a site, stockpiling for short term returns (no processing obviously means reduced costs for these collectors) and then abandoning the site and the liability to the government and ultimately the community to manage.
- We would also suggest some form of waste tracking and data collection would enhance the regulatory approach guaranteeing a 'supply chain' solution that holds retailers as well as collectors and processors to account for their waste.
- Finally, again, ATRA and its Victorian members remain keen to support the EPA and government in implementation and look forward to this opportunity.

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Regards

A handwritten signature in black ink, appearing to read 'Rob Kelman', is written over a light blue horizontal line.

Rob Kelman  
Executive Officer  
ATRA