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BRIDGESTONE

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Ref AA836L

Kaitlin Hanrahan

Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear Kaitlin,

Subject: AA1000409 – Tyre Stewardship Australia – submission

I am in receipt of your letter of December 13, 2017, reference 63031 and wish to respond accordingly to the questions listed in Attachment A of the document.

1. In our view Tyre Stewardship Australia (TSA) is an essential body represented by the Tyre industry to create awareness and promote industry participation in the issue of tyre disposal. Without this organization it is felt that no common objective would be enabled to deal with the current issues.
2. I can only speak from the point of view of Earthmover Tyres as this is the primary business of our Company. At present there is no practical or commercial method of disposing of Giant Off the Road Tyres (OTR). Therefore, the need to have common industry participation and discussion on this matter is vital. This should include TSA involvement as well as the mining industry.
3. No comment as per point 2.
4. I cannot see any issues relevant to competition through the TSA Scheme
5. The current scheme is primarily focused on Passenger Car and Truck and Bus Tyres and the scheme appears to be accepted by the majority of the major tyre manufacturers and distributors. It is paramount that the introduction of any levy scheme for OTR tyres is applied to all importers and distributors in order to maintain a level playing field.
6. Not fully aware of the details of greater flexibility requested
7. As previously stated it is important that the industry is driving the requirement for tyre disposal. The programs introduced and applied by the TSA can only be of public benefit for the improvement of the environment.
8. I am not aware of any detrimental issues as a result of the TSA scheme.

Yours sincerely

Bridgestone Earthmover Tyres Pty Ltd



Andrew Andreou
Chief Operating Officer