

10 May 2018

Our Ref: FCL BJH TYR280-131069

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Dear Ms Hanrahan

**Tyre Stewardship Australia Limited Application for authorisation AA1000409
Response to draft determination**

We refer to the Australian Competition and Consumer Commission's (**ACCC**) draft determination dated 27 April 2018 (**Draft Determination**).

We confirm that Tyre Stewardship Australia Limited (**TSA**) accepts the proposed period of authorisation in the Draft Determination, being six years. Similarly, TSA does not wish for a pre-hearing conference to be called in relation to the Draft Determination.

However, TSA wishes to clarify a matter.

Please note that in relation to paragraphs 29 and 76(f) of the Draft Determination, TSA wishes to point out that there is limited transparency in relation to the end-of-life destinations of *all* exported tyres, not merely those tyres which are baled for export. In this regard, we confirm that baling is a method of compressing tyres for the purposes of export, rather than exporting them whole. It is the end-of-life destination of all exported tyres (whether they are exported as shredded tyre product, whole tyres, or baled tyres) that is of primary concern to TSA in managing the Tyre Product Stewardship Scheme. TSA is seeking to address this through the verification of downstream vendors going forward.

Please contact Francesca Lai or Ben Hamilton if you have any questions or would like to discuss this letter further.

Yours faithfully



Hall & Wilcox