



Ms. Kaitlin Hanrahan,
Australian Competition & Consumer Commission
23, Marcus Clarke St, Canberra ACT 2601

30 January 2018.

By Email:

Dear Kaitlin,

I refer to your letter dated 13 December 2017 and our subsequent exchange of January 16, granting us an extension for response to February 2.

The Directors of this Council have asked me to express their support for the Product Stewardship initiative in general as well as for the submission lodged by Tyre Stewardship Australia Ltd. on December 5, 2017.

It is our belief that circumstances have not changed since the original submission lodged by this Council in 2012/2013 and that a market failure is still affecting the recycling of end-of-life tyres in Australia. These circumstances have become even more severe in recent years and Tyre Stewardship Australia finds itself operating under difficult circumstances derived from elements such as dis-homogeneous national legislation, the voluntary nature of the Scheme itself, international energy markets and international subsidies on tyre-derived crumb.

We believe that the public benefit outweighs any public detriment that might derive from the submission of Tyre Stewardship Australia and wish to stress that we will welcome an increase in participation from its current and future accredited entities, especially under the form of accurate and timely reporting of data on the actual destination of end-of-life tyres. We will also seek action from TSA in case of non-compliance with reporting requirements.

The Directors of this Council acknowledge the challenge faced by Tyre Stewardship Australia and seek the support of the Commission in granting the authorisation requested.

Please feel free to call nor write at any time if I can be of further assistance.

Yours sincerely,



Silvio de Denaro,

Company Secretary

Australian Tyre Industry Council Ltd.

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