



8th January 2018

Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

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Dear Sir/Madam

Subject: AA1000409 – Tyre Stewardship Australia – submission

I am writing on behalf of Bridgestone Australia Ltd. ("BSAL"), and as Managing Director of that Company. BSAL is a Member of Tyre Stewardship Australia ("TSA"), and I am a Director of TSA. BSAL imports and distributes passenger car, 4x4/SUV, and truck tyres across Australia under the **Bridgestone, Firestone** and **Supercat** brands. BSAL is also a major retreader of used truck and bus tyres in Australia using the **Bandag** retreading method. **Bandag** truck and bus tyre retreading recycles a significant number of used truck and bus tyres for re-use in Australia. BSAL pays a levy to TSA equivalent to \$0.25 per new passenger car tyre equivalent sold in Australia.

I refer to TSA's application for authorisation for continuing a voluntary, national Tyre Stewardship Scheme which aims to increase the recycling rate of end-of-life tyres.

BSAL supports the continuation of the national voluntary Tyre Stewardship Scheme, and supports TSA's application for authorisation (Ref: AA1000409) which has been submitted to ACCC.

BSAL believes there is significant public benefit in continuation of the Scheme, both from an environmental and public health benefit. These benefits are well explained in the TSA application and BSAL is in agreement with these explanations.

In BSAL's opinion, there is little impact on competition in the market. From a tyre importer/reseller viewpoint, there is minimal competitive impact as most of the TSA levy is generally absorbed by the tyre importer/reseller. From a recycler/collector viewpoint, TSA accreditation is required, where possible, for use of their services by a TSA member company. This seems to have minimal impact, and if anything, has helped to lift the standards of the tyre recycling/collector industry.

As well as TSA accreditation of end-of-life tyre recyclers/collectors, BSAL advocates and supports use of Australian Tyre Recyclers Association members ("ATRA") for tyre collection and recycling by Bridgestone Franchised and Licensed stores. This reassures the Company that end-of-life tyres are being appropriately processed in an environmentally sustainable manner. BSAL is a strong supporter of ATRA.

BSAL sees no significant public detriments to the continuation of the Scheme and supports TSA's application for authorisation which has been submitted to ACCC.

Yours Faithfully

ANDREW MOFFATT
Managing Director
Bridgestone Australia & New Zealand