

ABN 20-089266375
15 Forest Crt
Templestowe Vic 3106
alfred.eiden@bigpond.com
Ph.: 61-3-98419205
Mb: 0410433859



31st October 2012

Mr. Jaime Martin
Assistant Director | Adjudication
Australian Competition & Consumer Commission
Level 35 | 360 Elizabeth Street, Melbourne, 3000

Re: Endorsement for Granting Australian Tyre Industry Council (ATIC)
Approval for Operating a Tyre Stewardship Scheme

Dear Mr. Martin,

I am responding to information sent to me on 19th of October 2012 concerning the Commission's response to ATIC's submission to operate a Tyre Stewardship Scheme as an incorporated entity.

Polytech Resources is an independent materials and process engineering consultancy providing professional advice and assessment on tyre recycling technology, and on opportunities for materials recovery and product innovation. Educated in Germany in materials process engineering (Rubber Technology), I held senior engineering positions with Dunlop International in Germany, UK and Malaysia in tyre manufacture, and later with BICC and Olex Cables in Australia, where I was engaged in cable engineering (Mining and Industrial Rubber Cables). I became an Adjunct Research Fellow at Monash University in 2009 with focus on material recovery and conversion value added products from waste streams.

In my assessment, initiatives taken by ATIC to establish a national Tyre Stewardship Scheme (TSS) covering the entire 'End of Life' (EoL) tyre range, is a very constructive step, which will benefit all stakeholders in the supply chain. Dealing comprehensively with EoL tyres will benefit Australia in general, as existing practices impact negatively, in many different ways. To continue with *current* practices would lose the opportunity to capture the inherent value of the materials in this waste stream.

Without a coherent, coordinated approach to recovery and conversion of the inherent materials of EoL tyres, many benefits remain uneconomical, their value only partly realized. The scheme as offered is designed for voluntary participation: I am of the opinion the many new opportunities opened to them will motivate new and existing industry participants to join. Importantly, the much-needed investment for product innovation in Australia will be attracted by a more coherent industry approach.

The benefits to Australia can be seen by utilizing the inherent value of EoL tyre materials, conservatively estimated to be \$ 350 million per annum, in Australia, to create new enterprises, generate employment, produce energy replacement and tyre derived products both for internal applications and for export. An industry-focused approach generates the means and incentives to research and develop unique and novel processes and products enhancing the creation of knowledge within Australia.

I strongly endorse ATIC's application for permission to operate the proposed Tyre Stewardship Scheme, and would urge the Commission to this course.

Yours sincerely

A handwritten signature in black ink, appearing to read "Alfred Eiden", written in a cursive style.

Alfred Eiden
Managing Director

Copy: Mr. Gerry Morvell, Chair Tyre Implementation Working Group, C/- Secretariat Tyre IWG