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Government of South Australia

Zero Waste SA

AUST. COMPETITION &
CONSUMER COMMISSION
CANBERRA

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Mr David Hatfield
Director Adjudication Branch
Australian Competition & Consumer Commission
GPO Box 3131
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Dear Mr Hatfield

RE: AUSTRALIAN TYRE INDUSTRY COUNCIL APPLICATIONS FOR AUTHORISATION (A91336-A91337)

I refer to your letter dated 19 October 2012 and your invitation to comment on the above application for authorisation from the Australian Tyre Industry Council (ATIC).

The South Australian Government established Zero Waste SA to promote waste management practices that as far as possible eliminate waste or its consignment to landfill, and advance the development of resource recovery and recycling.

The timely introduction of a product stewardship scheme for end-of-life tyres aligns with the goals of *South Australia's Waste Strategy 2011-2015*. The objectives of the strategy are to: maximise the useful life of materials through re-use and recycling; and avoid and reduce waste, with specific priorities for action focussing on supporting product stewardship initiatives, including for tyres.

The vast majority of Australia's end of life tyres are currently disposed through landfill, export, stockpiling or illegal dumping with only a very small proportion recycled or used as a fuel for energy in Australia. Disposal through export, landfilling or dumping represents the loss of a valuable resource to the Australian economy.

When end of life tyres are put to productive use they reduce the demand for virgin materials in the production of goods and energy, reduce pressure on landfill space and improve the amenity of the land, and eliminate the risk of fire and breeding grounds for mosquitos and other vermin.

It is Zero Waste SA's view that the likely public benefits from the arrangements proposed by the ATIC outweigh any public detriment.

Following the ACCC's assessment Zero Waste SA looks forward to the voluntary scheme ultimately being accredited under the *Product Stewardship Act 2011 (Cth)*.

Yours sincerely


Vaughan Levitzke
Chief Executive
Zero Waste SA

Date: 26/10/12