

## **Green Distillation Technologies**

Re: A91336 – A91337

In reference to comments by C&R Tyre Recycling at the pre conference on 12/2/13, that money and the bottom line are the real drivers of the practicality of recycling solutions, we concur with that view.

The tyre retailers are at the forefront of this issue and we know from practical experience that they are continually driving the collector's price down. This makes it impractical for them, the collectors, to spend money on recycling and therefore directs them towards undesirable solutions.

Under the articles of ATIC do 'collectors' and 'recyclers' form part of the Tyre Industry as a whole and if so do they have any representation within the council? (this builds on the points made orally at the meeting in reference to collectors in Clauses 26 & 78).

GDT believes it to be vitally important that they are included within the circle of influence particularly as we head towards a stewardship scheme. If the downward price spiral continues it becomes more impractical for collectors, as the economic incentive and encouragement to recycle disappears.

We also feel that the voluntary levy placed on the consumer is now an 'accepted' position. The current situation where the retailer controls the distribution of that levy is totally unacceptable. We respectfully suggest that ATIC and Government get involved in that area and try to achieve a more equitable distribution that will enforce proper record keeping and encourage recycling in line with the stated position of ATIC.