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Mr Richard Fleming  
A/g General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601  
Via email: [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

Dear Mr Fleming

I am writing to you on behalf of the Australian Motor Industry Federation (AMIF) in relation to the Commission's recent draft determination, which proposes to grant authorisation to the Australian Tyre Industry Council's Tyre Stewardship Scheme. AMIF has, within its structure, the Australian Tyre Dealers and Retreaders Association (ATDRA) and, as such, has taken an intense interest in this matter.

The Commission will be aware that efforts to develop and implement an appropriate policy response to the issue of end-of-life tyres have been underway for two decades. In all of that time AMIF – on behalf of ATDRA and through its predecessor organisation, the Motor Trades Association of Australia (MTAA) – has been a stakeholder and party to those efforts. Three years ago a new path was determined for end-of-life tyres. An implementation group was formed comprising representatives of ATIC, AMIF (on behalf of ATDRA), the Australian Tyres Recyclers Association (ATRA) and the Australian Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) and Independent Chair. This has realised the current proposals for a tyre product stewardship scheme (TPSS) in Australia. Central to those proposals is the establishment of Tyre Stewardship Australia (TSA).

AMIF, through ATDRA and Member Bodies, has consulted widely with affected retail motor traders both during the development of the TPSS and as it stands in its final form. AMIF and affiliated organisations fully supports the proposals for a TPSS and looks forward to the establishment of TSA and the implementation of the TPSS as currently proposed.

If there is any further information you require in relation to this matter, please do not hesitate to contact me or our Director Policy, Mr Colin Duckworth on 02 6273 8222.

Yours sincerely

A handwritten signature in black ink that reads "Richard Dudley". The signature is fluid and cursive, with the first name being more prominent.

Richard Dudley  
Chief Executive Officer  
4 March 2013