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Our Ref **139972/1 NT.pm**
Your Ref **A91336-A91337**

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Monday, 18 March 2013

Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Attention: Jaime Martin

BY EMAIL: jaime.martin@accc.gov.au

Dear Ms Martin

**AUSTRALIAN TYRE INDUSTRY COUNCIL
APPLICATION FOR AUTHORISATION (A91336-A91337)**

We refer to your email of 15 March 2013.

We are instructed by our client to respond to the matters raised in your email.

The proposed composition of the TSA Board following the Pre-Decision Conference of 12 February 2013, as set out in our letter of 8 March 2013, represents a slight change from the Guidelines. In practice it is agreed that the board member selected by ATIC and the Australia Tyre Recycling Association (ATRA) will be tasked with representing the interests of both collectors as well as recyclers.

In answer to your specific questions:

1. Our client understands that ATRA members represent approximately 60% of the tyre collection activity in Australia. The remainder is carried out by a number of small operators and is highly dispersed.

Our client is not aware of any specific representative body for tyre collectors in Australia.

2. To the best of our knowledge, yes, it is common for tyre recyclers to operate a collection activity as part of their business.

With this in mind, it is reasonable to envisage that ATRA can adequately represent the interests of both tyre recyclers and tyre collectors.

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We invite you to contact us should you have any further queries.

Sincerely

A handwritten signature in black ink, appearing to read "N. Tebbe". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

NICHOLAS TEBBEY

Supervising Director GERALD SANTUCCI