

19 January 2024  
Australian Competition and Consumer Commission  
Attn: Ben Janover  
Via ACCC submission [web form](#)

Dear Mr Janover

**Tyre Stewardship Australia Limited application for revocation of authorisation AA1000409 and substitution of AA1000655 – interested party consultation.**

The Australian Local Government Association (ALGA) welcomes the opportunity to provide input into the re-authorisation of Tyre Stewardship Australia Limited (TSA) to give it legal protection from competition laws to continue to operate the national Tyre Product Stewardship Scheme (the Scheme).

ALGA is the national voice of local government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of State and Territory Local Government Associations. This submission should be read in conjunction with any separate submissions received from State and Territory Associations as well as individual councils.

ALGA supports a product stewardship scheme for end-of-life (EOL) tyres, with our strong preference being that this (or another) Scheme be made mandatory by the Australian Government as soon as possible. Although the Scheme has achieved some positive outcomes on end-of-life tyre recovery outcomes, gains are severely limited by the voluntary nature of the scheme. The Scheme fees must be sufficient to cover the full cost of tyre recycling to prevent illegal dumping and incorrect storage of tyres which is currently occurring, especially in regional and remote areas.

ALGA is supportive of the proposed re-authorisation of TSA to run the Scheme on the proviso TSA pursues transition towards a regulated scheme covering all tyres including off-the-road (OTR) tyres. Beyond this, ALGA would not support a further re-authorisation unless it is within a regulated scheme.

Should you require any further information in relation to the matters raised in this submission, please contact Denise Anderson on 02 6122 9400 or [denisea@alga.asn.au](mailto:denisea@alga.asn.au).

Yours sincerely,



Amy Crawford  
ALGA CEO