

Australian Competition and Consumer Commission (ACCC)

Att: Mr Gavin Jones and Mr Ben Janover

By email:

gavin.jones@accc.gov.au

ben.janover@accc.gov.au

2nd February 2024

Dear Messrs Jones and Janover

RE: TYRE STEWARDSHIP AUSTRALIA (TSA) RE-AUTHORISATION SUBMISSION

CTS Tyre Recycling (ABN 21 644 200 528) makes this submission as a subsidiary of Complete Tyre Solutions a privately owned business with more than 35 years of experience in the Australian tyre industry.

We are aware that **Tyre Stewardship Australia Limited has made application for revocation of authorisation AA1000409 and substitution of AA1000655.**

For brevity in this submission, we wish to make it clear that we are aware of the thrust of the submission you will receive from the Australian Tyre Recyclers Association (ATRA) and that we **support that submission in its entirety.**

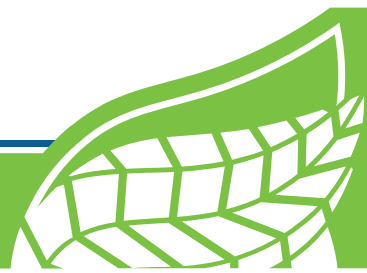
CTS Tyre Recycling is not currently a member of ATRA but expects to be so within a matter of months.

Specifically, we submit that TSA currently fails to recognise the contribution of established Australian tyre recyclers. There are currently no tyre recyclers on the TSA Board.

We echo ATRA's position that re-authorisation should only be granted on the following conditions:

1. *At least one tyre recycler position is created on the TSA Board (refer Section 3, Governance, of the ATRA submission);*
2. *Public claims made by TSA are reviewed to ensure they are 'accurate and truthful'; and*
3. *TSA is required to clarify publicly inconsistencies in the publishing of data and acknowledge that recent media releases could be construed as misleading (refer Section 2, Data and Reporting, of the ATRA submission)*

By way of background, Complete Tyre Solutions and CTS Tyre Recycling are major players in the supply, repair, and maintenance of tyres to the passenger, transport, agriculture and mining and resource sectors. Our company has committed ~\$30-million to build a dedicated tyre recycling facility at Neerabup, in Perth's northern suburbs, and expects to be accepting end-of-life tyres at the site within months, with full processing by year-end.



The Neerabup project, supported by grants from the Commonwealth and Western Australian governments, will deliver a state-of-the-art tyre recycling plant to process waste tyres into crumb rubber, tyre derived products, reusable high tensile steel wire and reusable textile.

The crumb rubber will also be remanufactured to produce rubber matting suitable for a wide range of value-added uses, including as soft-fall flooring, large scale flooring underlay and for equestrian and agricultural applications.

The tyre recycling process includes a “pre-shredding” process to enable recycling for the first time in Australia of “Off The Road” (OTR) tyres of the type and size used on massive haul trucks across the mining industry.

CTS Tyre Recycling (together with parent company Complete Tyre Solutions) will provide a full service offering whereby it can sell a tyre, service and maintain where required, and recycle the end-of-life product, placing it and its business partners at the forefront of the tyre industry’s move towards a full circular economy.

For more information on our credentials and activities please see:

<https://ctstyrecycling.com.au/>

<https://completetyresolutions.com.au/>

We thank the ACCC for the opportunity to lodge this submission.

Kind regards



Leigh Cometti

Managing Director

