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CE-24-0168

Mr David Hatfield
Director
Competition Exemptions
ACCC
GPO Box 3131
Canberra ACT 2601

Email: exemptions@accc.gov.au

Dear Mr Hatfield

Re: Tyre Stewardship Australia Limited application for re-authorisation AA1000655 draft determination and interim authorisation

Thank you for your letter dated 7 June 2024 inviting interested parties to comment on the Australian Competition and Consumer Commission's (the ACCC) draft determination in respect of the application for authorisation lodged by Tyre Stewardship Australia Limited (TSA).

Green Industries SA (GISA) and the South Australian Environment Protection Authority (EPA) has noted the ACCC's draft determination provided with your letter which sets out a proposal to grant authorisation of the TSA for 3 years.

GISA and the EPA provided a submission to the ACCC dated 29 January 2024 supporting renewal of the authorisation to the TSA and the continuation of the Tyre Product Stewardship Scheme (the Scheme) to improve outcomes for end-of-life tyres (EOLT) generated in Australia, consistent with the principles of the waste management hierarchy and the circular economy.

GISA and the EPA agree that continuation of the Scheme is likely to result in environmental and public health and safety benefits by decreasing the volume of EOLT entering the domestic waste stream, being stockpiled or unsustainably burned for energy recovery. The ACCC draft determination acknowledges that TSA considers that transitioning to a co-regulated model under the *Recycling and Waste Reduction Act 2020* would allow it to better achieve its goals, and as such, TSA is seeking authorisation for 3 years in the hope that a new regulatory framework will be implemented in that time.

GISA and the EPA consider that it is in the public interest to continue the Scheme as administered by the TSA and supports the ACCC draft determination to grant authorisation of the TSA for a further 3 years. South Australia will continue to advocate for a regulated national product stewardship scheme for EOLT and work with Federal, state and territory governments, and the TSA to ensure the effective operation of the Scheme to achieve the desired circular economy outcomes.

For further information on this matter, please contact Kerryn Suthern, Environmental Adviser, EPA on [REDACTED] or [REDACTED]

Yours sincerely,



Josh Wheeler
A/Chief Executive
Green Industries SA

Date: 5 July 2024



Jon Gorvett
Chief Executive
Environment Protection Authority

Date: 5 July 2024