



19 January 2024

Ben Janover  
Contact Officer  
Australian Competition and Consumer Commission  
Your ref: AA1000655

By email: [exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)

Dear Mr Janover

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

Thank you for the opportunity to make a submission in relation to the application for re-authorisation by Tyre Stewardship Australia Limited (TSA).

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of twelve local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.8 million, one third of the population of Sydney, including NSW's most densely populated suburbs.

SSROC strongly supports the NSW Government's aims to improve the recovery of resources from waste, including through product stewardship schemes such as that operated by TSA. Product stewardship schemes can directly improve resource recovery outcomes, but critically also focus the responsibility for the recoverability and reusability of products on the producer: this is essential as we move towards the Circular Economy that is central to Government policy. TSA has an important role within this context.

SSROC is aware of and values the role of TSA in the operation of the Tyre Product Stewardship Scheme. We are currently working with TSA on a project to demonstrate the effectiveness, value and environmental and social benefits of asphalt mixes that incorporate rubber from used car and truck tyres. The project is partly funded by TSA, which covers the costs of the technical design of the demonstration projects, materials specifications, site-monitoring and life-cycle assessment. The trials themselves are funded by the 11 participating councils, and will help to inform the future application of different mixes for different road conditions.

Importantly, we anticipate that this type of asphalt will extend the life of the road due to a range of known benefits:

- Higher resistance to deformation and less rutting
- Improved adhesion and bonding with bitumen
- Less windscreen damage, contributing to road safety
- Increased resistance to heavy vehicular traffic and high impacts
- Better road grip
- Reduced UV and thermal sensitivity, so better resistance to cracking
- Cost-effective binder relative to other polymers
- Safer laying technique, and less maintenance required



TSA operates the scheme effectively, and is a proactive product stewardship and advocacy body. The effective operation plus advocacy makes a significant contribution to normalising the need for products to be reused, recovered, or recycled rather than disposed of by means that offer only environmental damage such as landfill and burning. Articles by TSA have been published in the leading Australian waste industry publication, Inside Waste, and has been a good partner in our project. SSROC supports TSA in its role developing and eventually embedding this beneficial use of end-of-life car and truck tyres.

The organisation has established the scheme very well, with tyre retailers actively participating, and initiatives such as our clearly showing the potential for tyre-derived rubber to be recovered and reused in a way that is commercially viable.

SSROC supports the re-authorisation of TSA for a further 3 years so that it can continue its valuable work establishing a viable product stewardship scheme.

Should you have any further enquiries in relation to this letter, please contact me or SSROC Senior Coordinator Circular Economy, David Kuhn, by email [ssroc@ssroc.nsw.gov.au](mailto:ssroc@ssroc.nsw.gov.au) or by phone [REDACTED].

Yours sincerely

[REDACTED]

Helen Sloan  
**Chief Executive Officer**  
**Southern Sydney Regional Organisation of Councils**