

**Geoff Gwilym**  
CHIEF EXECUTIVE OFFICER



7 February 2024

Mr Ben Janover  
Contact Officer  
Australian Competition & Consumer Commission

**Victorian Automotive  
Chamber of Commerce**

ABN 63 009 478 209

VACC House  
650 Victoria Street  
NORTH MELBOURNE VIC 3051

P: 03 9829 1103  
E: [ggwilym@vacc.com.au](mailto:ggwilym@vacc.com.au)

Via email: [ben.janover@accc.gov.au](mailto:ben.janover@accc.gov.au)

**Ref: AA1000655**

Dear Ben

The Victorian Automotive Chamber of Commerce (VACC) thanks the Australian Competition and Consumer Commission (ACCC) for the opportunity to provide a response to the Tyre Stewardship Australia (TSA) re-authorisation application to continue to operate the national Tyre Product Stewardship Scheme.

VACC notes the stated operational objectives of TSA,<sup>1</sup> which includes undertaking education and awareness activities associated with end-of-life tyres, as well as focusing on the human and environmental impacts resulting from illegal dumping and excessive stockpiling. VACC considers TSA to be an integral part of the national waste policy solution, which aims to address weaknesses within the circular economy for waste in Australia (including tyres).<sup>2</sup>

In a short time, TSA has proven to be a consistent and authoritative voice on end-of-life tyres, including identifying viable markets for repurposing the waste into tyre derived products. They have also been active in the development of several high quality, comprehensive industry reports and regularly engage with stakeholders. The "mytyres mychoice"<sup>3</sup> campaign has been positively received by industry as it raises awareness to consumers of the inherent dangers of dumped tyres, while also promoting the use of accredited retailers committed to the responsible disposal of used tyres.

VACC supports TSA's application to continue operating the national Tyre Product Stewardship Scheme under the current framework – in the absence of regulatory intervention. VACC does however, acknowledge several deficits within the current Scheme due to its voluntary nature. It is VACC's long standing position that a co-regulatory framework is required to address the long-term, negative effects of end-of-life tyres.

According to TSA, approximately 1.8 million tyres were either illegally dumped, stockpiled, hidden in warehouses or put into landfill in Victoria in 2022-23.<sup>4</sup> Added to this, many Australian automotive retailing businesses are facing critical industrial waste collection delays due to ongoing global shipping issues, labour shortages, the export ban on whole and baled tyres, and the lack of local markets able to use tyre derived products. Additionally, retailers are now faced with the financial burden of clean-up costs resulting from unauthorised dumping of tyres on their own premises. Illegal dumping is also on the rise in state and local parks as well as local community facilities.<sup>5</sup>

Councils are bearing the costs related to collecting dumped tyres, which is transferred to the rate payer. For example, the City of Brimbank reportedly collected approximately 73 tonnes of tyres dumped in public space last year, equating to 8000 tyres.<sup>6</sup> In 2022-23 Australia generated an estimated 545,000 tonnes of used tyres, with only around 320,000 tonnes, or 58 per cent recovered.<sup>7</sup> Clearly more needs to be done to help address this significant shortfall.

---

<sup>1</sup> Tyre Stewardship Australia "Guidelines for the Tyre Product Stewardship Scheme, Amendment 1.1" <<https://www.tyrestewardship.org.au/wp-content/uploads/2021/01/TSA0060-TPSS-Guidelines-2021-Final.pdf>>.

<sup>2</sup> Department of Climate Change, Energy, the Environment and Water "National Waste Action Plan 2019" <<https://www.dcceew.gov.au/environment/protection/waste/publications/national-waste-policy-action-plan>>.

<sup>3</sup> Tyre Stewardship Australia "mytyres mychoice" <<https://www.tyrestewardship.org.au/mytyresmychoice/>>.

<sup>4</sup> Tyre Stewardship Australia "Illegal dumping on the rise and Victoria is copping it" <<https://www.tyrestewardship.org.au/news/illegal-tyre-dumping-on-the-rise-and-victoria-is-copping-it/>>.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> TSA, "Australian Tyre Consumption and Recovery – 2022-23" <<https://www.tyrestewardship.org.au/wp-content/uploads/2023/11/Australian-Tyre-Consumption-2022-23.pdf>>.

There are significant public benefits to appointing one organisation whose solely responsible for promoting the sustainable use of end-of-life tyres. The efficacy with which they are able to work with respective states' Environmental Protection Agencies should not be understated. However, it remains VACC's position, should the current framework continue to experience a lack of industry support, VACC stands ready to support government intervention, which includes mandating the participation of all tyre manufacturers, as indicated by the Minister for Environment and Water.<sup>8</sup>

VACC would welcome the opportunity to discuss this matter with you or your team at a convenient time should there be a need. Please contact Mr John Khoury, Industry Policy Advisor, VACC [REDACTED] on [REDACTED] regarding any further information on this matter.

Kind regards



**Geoff Gwilym**

---

<sup>8</sup> The Hon Tanya Plibersek MP "*Labor taking action on recycling of mattresses, tyres and healthcare plastics*" <<https://minister.dcceew.gov.au/plibersek/media-releases/labor-taking-action-recycling-mattresses-tyres-and-healthcare-plastics>>.