



Ms Chloë Bird
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Waste Regulation and Stewardship Branch
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1 October 2021

Dear Ms Bird

Re: Exposure Draft of the Recycling and Waste Reduction (Export – Waste Tyres) Rules 2021

The Waste Management and Resource Recovery Association of Australia (WMRR) appreciates the opportunity to provide feedback on the Department's exposure draft of waste tyre rules and extends its apologies for providing this submission after the close of the consultation period. WMRR would be grateful if the government would consider our feedback below. WMRR is the national peak body for all stakeholders in Australia's \$15 billion waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation that represent a broad range of business organisations, the three (3) tiers of government, universities, and NGOs.

Australia has a strong and professional WARR industry, one that is a driver of jobs and business, employing approximately 50,000 full-time employees while growing investment in the economy. WMRR's members are involved in a range of important WARR activities, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual materials including energy from waste and landfilling.

WMRR acknowledges the Department's efforts in consulting and collaborating with the industry as it works to roll out the waste export bans, which we support. WMRR commends the department for developing considered and appropriate export rules for the export of waste tyres and would only make three (3) recommendations.

1. Request for delays to commencement are not supported

WMRR continues to support the intent of this ban (and all bans), recognising that there are challenges in transitioning for all material streams to these requirements. As such, we would not support any delay in implementation of this particular ban given that there were no delays considered for any other material stream, and we would request that all proposed license holders follow the licence process as soon as it is available to ensure compliance with the timeframes that have been known for two (2) years.

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WMRR submits that any delays to the ban would undermine the integrity of the ban and importantly, eliminate the work and investment to-date by the legitimate sector of the industry (as well as through the government's RMF) that has spent the last two (2) years gearing up for the bans as a whole. As you may be aware, it was as early as October 2019 that the tyre industry was alerted to the fact that bales of used whole tyres would be banned from export from 1 December 2021, giving the sector more than 18 months to factor this decision into their operations, retool, and generate new markets. To-date, there are operators who have spent millions of dollars in new plant and equipment for used tyre recycling that are committed to meeting the ban timetable and creating Australian jobs.

2. Reuse and rethreads

WMRR is urging the Department to continue to allow for the export of used tyres offshore where there is evidence of reuse ("seconds") and rethreading (casings being the exported product) outcomes as these are in line with the higher order uses within the adopted waste hierarchy. Exports of seconds and casings of all applicable used tyres – passenger, 4WD, light commercial, truck, bus and aviation – should be permitted if:

- The final destination for re-use can be identified via the verification of foreign end market location and these tyres are not exported to destinations that are subject to the OECD Control System for a partial or total ban on used tyre imports, or other country-specific risk frameworks that regulate the import.
- There is evidence of certification against international standards for re-threading with respect to international requirements and foreign end market verification processes and reporting, and where the Australian Standard AS 1973-1993 Pneumatic Tyres – Passenger Car, Light Truck and Truck/Bus – Rethreading and Repair Processes is complied with. Further, in relation to rethreading, the requirements for this export include that the tyre meets safety and construction standards and has at least 50% of its original thread.

3. OTR exports

Finally, WMRR proposes that until opportunities are identified to increase onshore recovery and processing of off the road (OTR) tyres, that these tyres – greater than 100kg - which include mine and excavation tyres, as well as solid (forklift) tyres greater than 20kg are exempted from the export ban.

Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's feedback.

Yours sincerely



Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

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