



Inquiry into the Recycling and Waste Reduction Bills 2020

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SUBMISSION – AUSTRALIAN TYRE RECYCLERS ASSOCIATION (ATRA)

The Australian Tyre Recyclers Association (ATRA) is pleased to provide the following submission to the above inquiry, particularly in relation the proposed ban on the export of whole bad tyres.

SUPPORT FOR THE EXPORT BAN

1. ATRA fully supports the proposed ban on the export of whole baled tyres. This is an extremely positive and long overdue policy intervention from the Federal Government.

Bales of whole tyres have been exported from Australia primarily to India and Malaysia applied to highly polluting used tyre pyrolysis plants or even open burning, i.e. whole tyres burnt under various drying kilns.

ATRA has undertaken extensive research and monitoring of this export over the past six years, including GPS tracking of bales of whole tyres, visiting these sites in India and Malaysia and engaging regulators in those countries, and have reported these findings to governments and other agencies.

LEGITIMATE EXPORTS

2. Australia does have legitimate exports of 'processed' used tyres and this will remain post the export ban.

These exports are primarily focused around shredded material exported to high end industrial facilities in South Korea and Japan including energy generation and cement kilns; as well as casings and retreads for direct reuse.

- a. Used tyres are notoriously difficult and costly to recycle and secondary use as a fuel (Tyre Derived Fuel - TDF) remains a viable solution for this problem waste
- b. One tonne of TDF replacing one tonne of coal = one tonne CO₂ prevented
- c. There is also a growing market for 'Off The Road' (OTR) i.e. large mining sector tyre recovery and disposal; whereby this material is partly processed domestically and exported to India for further processing including remanufacture into new tyres
- d. And whole tyres, primarily 4WD, Truck and Bus casings and retreads are exported for beneficial direct reuse

IMPLEMENTATION

3. The draft legislation outlines the need for **AUDITS** of operators exporting processed materials
 - a. ATRA supports audits on operators. Importantly, these audits must be undertaken prior to an operator being issued with an export licence
 - b. This pre-licencing audit will help ensure dodgy-operators are not legitimised early in the process, making it easier to monitor the sector. This pre-licence audit must include a full assessment of the capital capacity of an operator to meet export conditions (size thresholds contained below)

- c. The application process must be transparent; I.e. all applicants must be made public allowing for feedback to the department / auditing authority re; the bona fides of an applicant and their ability to process material to the required specification

PERMITTED EXPORTS

4. Whole baled tyres will be banned. However, there are numerous tricks dodgy operators within the industry will attempt in order to circumvent the legislation. This includes 'stacking' whereby several used tyres are forced into each other and this may be explained as 'casings' exports, but these tyres will in fact be exported for open burning like bales; or exports of tyres with one-cut or two-cut – again this material would have the same unsustainable fate as bales.
 - a. ATRA has proposed a minimum processed export size of 150MM (6inch chip) and below. ATRA understands this export threshold will be consulted in early 2021 as part of the regulatory consultation process.
 - b. Noting also that legitimate exports of casings and retreads will be permitted

ATRA would be pleased to make any additional direct representations to the Committee if useful.

Yours sincerely

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Australian Tyre Recyclers Association