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A RESOURCECO COMPANY

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Waste and Resource Recovery Team  
Department of Environment, Land, Water and Planning  
PO Box 500  
Melbourne VIC 8002

## Tyrecycle Combustible Recyclable Waste Material Submission

Tyrecycle is Australia's largest collector and recycler of end-of-life tyres, operating facilities across the country and delivering regional and metropolitan services across all states and territories. The market for end-of-life tyres is one of the most challenging in the waste and recycling industry, being impacted by both current and historical market failures.

Tyrecycle acknowledge the industry need for this Waste Management Policy (Combustible Recyclable and Waste Material) and support the advancement of regulation in this space. As a holder of an A09 waste tyre storage licence, we can confirm that our fire risk reduced as a direct result of going through the EPA licence works approval process and although the improvements came at significant financial cost, the results experienced at our operation in Somerton have been beneficial.

As a general observation, both the Policy and the Guidelines are singularly fire focused in their scope and obviously that leaves a gap between the wider general environmental duty requirements that are picked up when a site is licensed for tyre storage.

### Waste Management Policy (Combustible Recyclable and Waste Material)

It is our understanding that waste tyres are included in the definition of Combustible Recyclable and Waste Material and therefore both tyre recycling facilities and sites that stockpile tyres are both defined as Waste and Resource Recovery Facilities. We also assume that new tyres are not included in these definitions. It is deducted therefore that unlicensed tyre sites are included in the scope of the Policy. Greater clarity in term definition may be required to ensure accurate understanding from industry.

We would propose that the licence threshold for waste tyres be lowered from 5000 EPU (equivalent passenger units) to 100 EPU to ensure that all tyre recycling operations in Victoria achieve the same level of fire risk reduction. This is already occurring effectively in other Australian jurisdictions and enables regular interaction between recyclers and regulators, which encourages and supports communication and conversations about managing fire risks.

Tyrecycle do not support 7 b) of the Policy. The Guidelines are performance and risk based and as such already have sufficient room for interpretation. Opening up another avenue for alternative control measures may lead to weaker control measures at recycling sites, unnecessary regulator resources to manage these alternatives and an overall lack of clarity for how the industry reduces fire risk.



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10 Keegan Street,  
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## Management and Storage of Combustible Recyclable and Waste Materials Guideline

All of the content and direction contained in these Guidelines is reasonable, practicable and, from our experience, are proven to work. The improvement measures have made our business safer and have no doubt protected the local community and environment from potential adverse impacts derived from a fire event.

As mentioned above, the Guidelines are not prescriptive in nature and are littered with words such as 'adequate' and 'sufficient', leaving interpretation open and subjective which is not conducive to a level playing field for business. Unfortunately, the recycling industry and more specifically the end of life tyre recycling industry, has a proliferation of rogue elements within it that will seek out the lowest operating model unless regulation is definitively articulated and forcefully applied by the relevant regulatory body. Accordingly, any guidelines, policy or regulations that fail the above test will most certainly allow the industry rogues to prosper and the legitimate operators to be disadvantaged through increased costs and un-even industry landscape.

The intersection of these Guidelines with other existing health, safety and environmental guidance and legislation is also subjective and may lead to poor choices by industry if not standardised and enforced.

Tyrecycle operate a second, smaller site in Victoria that remains under the threshold for a waste tyre licence and stores tyres indoors. When looking for best practice methods for operating this site, we have followed the Guidelines as far as possible but have had to look for guidance from regulations in other States for the indoor storage of tyres. We recommend that indoor storage be addressed in the Management and Storage of Combustible Recyclable and Waste Materials Guideline.

We welcome the opportunity to discuss our submission in further detail at your request as we believe it appropriate to engage in a workshop environment to fully explore the requirements of this policy change.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Fairweather".

Jim Fairweather  
Chief Executive Officer  
Tyrecycle Pty Ltd