



All enquiries to Environmental Health on 9526 1111

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08 January 2026

Committee Secretary
House Standing Committee on Industry, Innovation and Science
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Parliament House
Canberra ACT 2600

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Dear Committee Secretary

Australian Tyre Industry Inquiry – submission by Shire of Serpentine Jarrahdale

The Shire of Serpentine is a large local government located on the outer-metropolitan fringe of Perth, Western Australia. The Shire has a mix of urban and rural development and expansive interface with national parks, forest, sensitive water resources and reserves. This landscape and positioning creates challenges for end-of-life tyre managing, lawful and unlawful disposal.

The Shire has considered the federal inquiry into the current state of the Australian tyre industry, and provides the following summary of submission comments as it relates to our unique environment.

Statutory environment

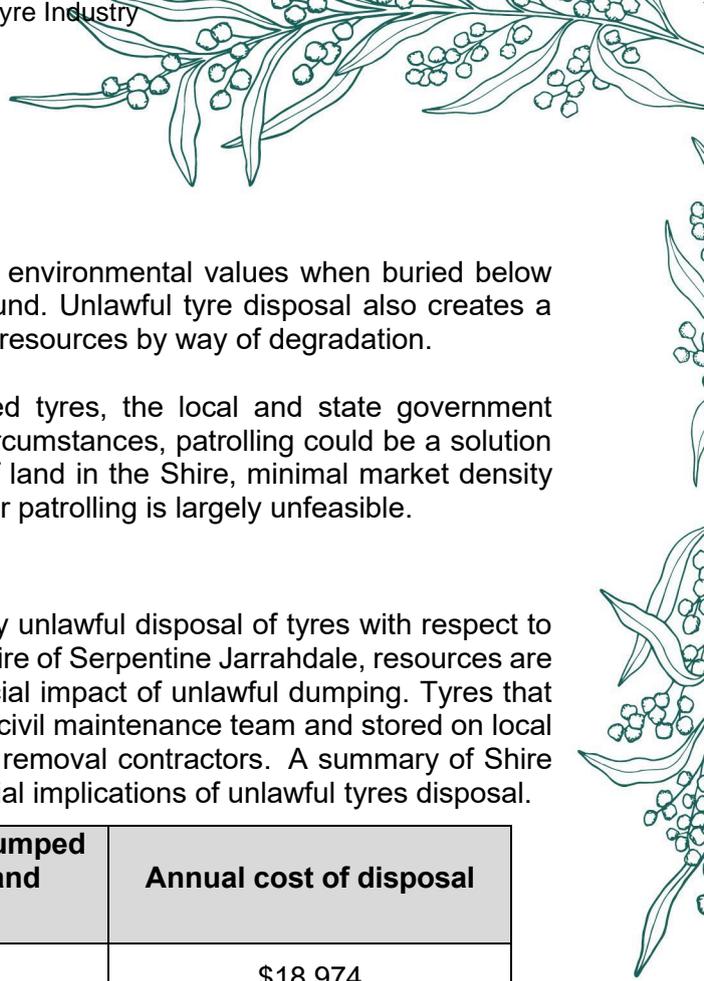
The storage, handling, transportation and disposal of used tyres are specifically controlled under the following Western Australia legislation:

- *Environmental Protection Regulations 1987* (Part 1, Schedule 1 and Schedule 5) – storage, handling, transportation and Disposal
- *Environmental Protection (Controlled Waste) Regulations 2004*
- Both the *Environmental Protection Act 1986* and the *Waste Avoidance and Recover Act 2007* have provisions that can be relevant to the control of used tyre waste.

The legislative provisions for regulatory management of waste are considered adequate, with appropriate enforcement options in place. The barrier to encourage enforcement is a lack of resourcing in the sector, specifically those Authorised under the legislation, to regulate unlawful disposal of tyres.

In Western Australia, the Department of Water and Environmental are the primary regulator for sites storing more than 100 tyres and the lead authority in response to tyre disposal at the scale of environmental pollution. The state government, similar to local government, face resourcing challenges in respect of environmental pollution control. This is not just a resourcing challenge associated with funding, but also a sufficient supply of qualified environmental health officers that are available for such important work. Both state and local governments report challenges in attracting and retaining environmental health officers.





Environmental risk and implications

Unlawful tyre disposal presents a risk to resources and environmental values when buried below ground and presents a fire risk when stored above ground. Unlawful tyre disposal also creates a hazard for mosquito breeding and risk to sensitive water resources by way of degradation.

Whilst legislation is in place to prevent illegal disposed tyres, the local and state government regulators report high rates of tyres disposal. In some circumstances, patrolling could be a solution to informal dumping. However, due to the vast extent of land in the Shire, minimal market density and competing local government service priorities, Officer patrolling is largely unfeasible.

Financial implications

The Shire of Serpentine Jarrahdale is highly impacted by unlawful disposal of tyres with respect to the cost of collection, storage and disposal. Within the Shire of Serpentine Jarrahdale, resources are required to be allocated each year to manage the financial impact of unlawful dumping. Tyres that have been illegally disposed are collected by the Shire’s civil maintenance team and stored on local government property before collection by approved tyre removal contractors. A summary of Shire expenditure is prepared below to demonstrate the financial implications of unlawful tyres disposal.

| Financial year | Number of illegal dumped tyres collected and disposed | Annual cost of disposal |
|--------------------------|--|--------------------------------|
| 2023/2024 | 1405 | \$18,974 |
| 2024/2025 | 1130 | \$8,082 |
| 2025/2026 as at 02/12/25 | 246 | \$2,252 |

Table 1. Summary of Shire of Serpentine unlawful tyre storage and cost of disposal.

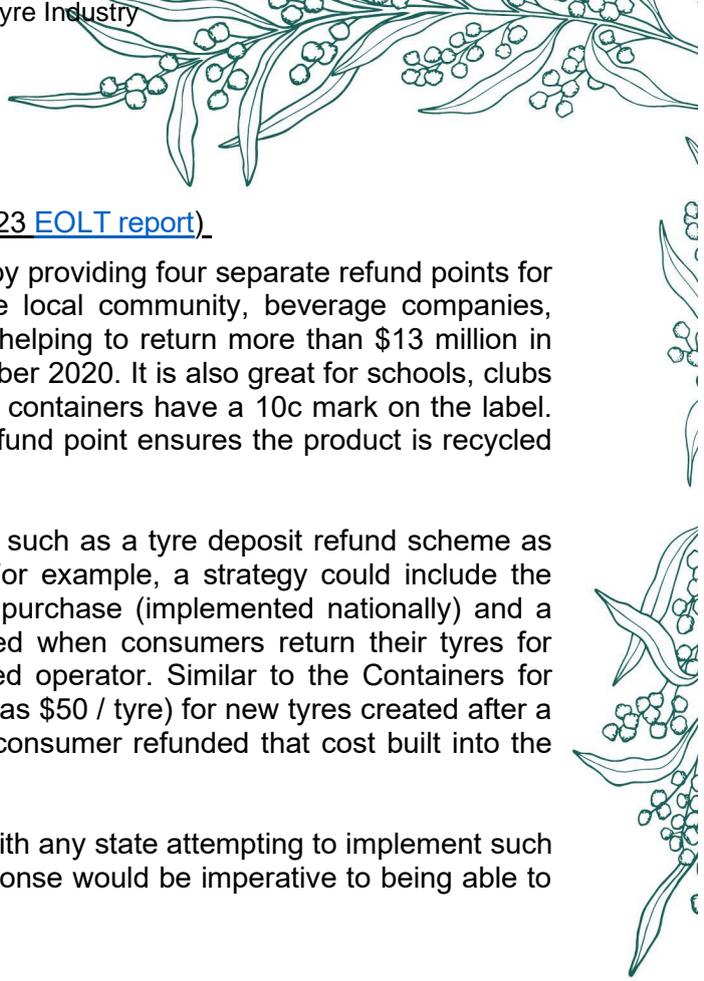
Barriers for Used Tyre Disposal

The Shire provides a Waste Transfer Station facility and disposal services however tyres are non-accepted items. One barrier to resource recovery is the cost of infrastructure required to effectively recycle tyres. An additional barrier is the process of obtaining relevant statutory approvals for land use to set up recycling facilities in Western Australia. Streamlining the process of obtaining the appropriate Licence or Works Approval from the Regulator (WA Department of Water and Environmental Regulation) could help accelerate the growth of capacity to reuse tyres in Western Australia.

The closest landfill facility approved to accept and dispose of waste tyres is the Armadale Waste Transfer Station, located outside of the Shire’s jurisdiction and not positioned centrally to the Shire community. The facility accepts up to six (6) tyres per visit and charges up to \$65 per tyre on rim for disposal. It is understood that the current practice is to shred tyres in Western Australia and export the shredded material as tyre derived fuel to generate energy.

Due the high volume of tyres collected and associated costs, it is unfeasible for the Shire to undertake delivery and disposal at the nearest approved waste transfer station.





Circular Economy Model - Recycle incentive scheme (2023 EOLT report).

The Shire supports the Containers for Change initiative by providing four separate refund points for Shire residents. Containers for Change works with the local community, beverage companies, recyclers and the waste industry to recycle containers, helping to return more than \$13 million in refunds to the Western Australian community since October 2020. It is also great for schools, clubs and charities to raise much-needed funds. Eligible drink containers have a 10c mark on the label. Returning 10c containers to a Containers for Change refund point ensures the product is recycled and not sent to landfill.

The Shire advocates for a circular economic instrument such as a tyre deposit refund scheme as one method to mitigate the issue of illegal dumping. For example, a strategy could include the consideration for upfront recycling fees at the point of purchase (implemented nationally) and a proportion that proportional cost of the tyre be refunded when consumers return their tyres for recycling at an approved disposal point or to a licensed operator. Similar to the Containers for Change scheme, it would be a sufficient incentive (such as \$50 / tyre) for new tyres created after a certain date, to be then returned for recycling and the consumer refunded that cost built into the upfront purchase price of the tyre.

Naturally, there would be a range of issues associated with any state attempting to implement such a scheme on their own, and thus a national agreed response would be imperative to being able to ensure such a scheme could work.

Shire of Serpentine Jarrahdale's Position

An end-of-life model is required for tyres to meet the objectives of this Strategy and provide much needed relief towards the environmental and financial impacts of the tyre industry at the local level. The Shire recommends a nationally consistent approach, which includes the appropriate support for businesses, consumers and an emerging tyre manufacturing industry, in order to sustainably manage this product into the future.

Thank you for the opportunity to provide this submission on behalf of the Shire.

Yours sincerely



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Director Development Services

