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Committee Secretary
House Standing Committee on Industry, Innovation and Science
PO Box 6021
Parliament House
CANBERRA ACT 2600

via: iis.reps@aph.gov.au

Dear Committee Secretary

Inquiry into the current state of the Australian tyre industry, and any challenges and opportunities for the industry within the context of a circular economy

The Australian Council of Recycling (ACOR) welcomes the opportunity to provide a submission to the House of Representatives Standing Committee on Industry, Innovation and Science's Inquiry into the Australian tyre industry. ACOR notes the submission made by the Australian Tyre Recyclers Association (ATRA) and acknowledges the value of their contribution to this inquiry.

ACOR is the peak industry body for the resource recovery, recycling and remanufacturing sector in Australia. Our membership spans the recycling value chain and includes leading organisations involved in recovered tyres, metals, glass, plastics, paper, organics, textiles, mattresses, oil, e-waste and battery reprocessing and remanufacturing, kerbside recycling, container deposit scheme operations, and construction and demolition recovery. Our mission is to lead the transition to a circular economy through the recycling supply chain.

Regulatory integrity and enforcement

ACOR is increasingly concerned that persistent non-compliance and weak enforcement of the waste export rules for tyres are undermining confidence and investment in domestic tyre recycling capacity. ACOR has been alerted to instances where operators appear to be operating outside regulated export requirements and has raised these concerns directly with the relevant Commonwealth department, including providing evidence of suspected non-compliance. To date, ACOR has not observed any material change in compliance outcomes or enforcement activity.

This lack of visible and timely enforcement creates uncertainty for legitimate operators, distorts market signals, and discourages investment in compliant processing infrastructure. Regulatory integrity, including transparent licensing, auditing, and enforcement, is critical to ensuring that responsible operators are not disadvantaged and that Australia's tyre recycling system can deliver genuine circular economy outcomes.

End markets for recycled tyres

The recycling system is a remanufacturing supply chain, comprising three essential elements: collection, processing, and end markets. Each element is vital for practical recycling outcomes and must be scaled and economically viable.

Markets for processed recycled tyre materials are of paramount importance, and the system is reliant on access to both domestic and international end markets. While unprocessed or whole tyres must not be exported in ways that breach regulatory requirements, policy settings should support strong, sustainable markets for processed materials, recognising global demand for recycled tyre products. At the same time, measures are needed to stimulate domestic demand for high-value recycled tyre products to ensure a robust and resilient local market.

Product stewardship, extended producer responsibility and policy proportionality

ACOR supports product stewardship and extended producer responsibility where market failures exist and where schemes are well-designed, properly governed, and developed in partnership with recyclers. Poorly designed schemes, however, risk prioritising administration over recovery outcomes, weakening end markets, and shifting costs and risks onto the recycling sector without improving environmental outcomes.

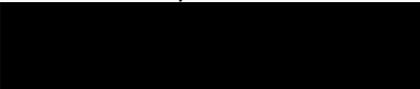
The tyre recycling sector provides a useful illustration of the importance of policy proportionality and system design. High collection rates, existing processing capacity, and established recovery pathways mean that policy interventions should be carefully targeted to address identified gaps rather than disrupt functioning parts of the system, and with a focus on enforcement of existing regulatory regimes.

Conclusion

ACOR welcomes the Committee's inquiry and encourages close consideration of the ATRA submission as a technically informed contribution grounded in operational experience.

We would be pleased to engage further with the Committee on the policy principles that apply across the recycling sector and support strong circular economy outcomes across all material streams.

Yours sincerely



Suzanne Toumbourou
Chief Executive Officer