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23 January 2026

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

By email: iis.reps@aph.gov.au

Dear Committee Secretary,

Re: Inquiry into the Australian tyre industry and its role within a circular economy

Tyrecycle welcomes the **Inquiry into the Australian tyre industry and its role within a circular economy** (the Inquiry) by the House of Representatives Standing Committee on Industry, Innovation and Science (the Committee) to better support waste, recycling and the circular economy and commends the Inquiry process.

Tyrecycle supports all efforts to realise a circular economy for tyres and thanks the Committee for the opportunity to provide this submission. We also welcome the opportunity to engage further and invite committee members to visit our world leading recycling sites to learn more about this important issue.

Executive Summary

Part of the ResourceCo Group, Tyrecycle is Australia's largest and only national tyre recycler. We perform an essential service for the Australian community transforming waste into valuable products to support the realisation of a circular economy for waste tyres.

Recyclers such as Tyrecycle ensure tyres have one of the best management systems for any waste stream in Australia evidenced by 96%[1] of used passenger and commercial tyres being safely collected and managed, only **.5%** being dumped or stockpiled annually[2], and the recovery rate for passenger and truck tyres increasing by 8% in 2024[3] (to 87%).

This performance is a direct result of a high-performing, competitive market. Australia's road construction sector already consumes around **30,000 tonnes** of crumb rubber annually—one of the strongest markets globally—while Tyrecycle is currently advancing a pipeline of **100,000+ tonnes** per annum in domestic **Tyre Derived Fuel (TDF)** opportunities. This market-led growth in domestic demand demonstrates that the industry is driving sustainable outcomes for waste tyres and improved market resilience through business led innovation, without the need for centralised intervention.

[1] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 48, Figure 30
[2] Page 62, Table 17.
[3] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 52, Table 11

Notwithstanding continuous improvement is a critical goal, Australia has an innovative and competitive market-based model with some of the strongest and most diverse markets in the world. These assets and investment should be respected and supported as we explore tyre management programs in Australia.

Tyrecycle supports efforts to improve the framework for waste tyre management that:

1. focus on the biggest market failure: **off-the-Road (OTR) tyres**, and mining tyres in particular, which have a **recovery rate of just 2%**[4]
2. are market based and do not interfere with existing highly invested recyclers that provide good service and deliver circular outcomes
3. focused on the source of tyre disposal issues – not the legitimate recycling industry
4. do not create inefficiencies and unnecessary burden upon on the high performing, legitimate tyre recycling industry.

ABOUT TYRECYCLE

Tyrecycle is Australia's only national tyre recycler operating seven plants across the country with over 230 staff.

Tyrecycle have recently invested over **$50 million** in capital upgrades to expand domestic capability including a strategic push into the OTR market via a **$12.8 million** investment in Port Hedland (WA), alongside major developments in Newcastle (NSW), Rockingham (WA), and Erskine Park (NSW).

Tyrecycle plants are equipped with advanced rubber re-manufacturing capabilities processing in the order of 20 million tyres per annum with a recycling rate of 99%, producing high quality repurposed material for the local and global market.

See Appendix 1 for more information on Tyrecycle.

INQUIRY INFORMATION REQUEST

1. Reviewing tyre manufacturing, distribution, importation, and retail trends.

In assessing tyre industry trends, it is critical that the Committee distinguish between the **Passenger and Truck (P/T)** market and the **Off-the-Road (OTR)** market. Conflating these sectors obscures the reality of the industry's performance.

Passenger & Truck (Success):

This is a highly developed, commercial market with collection rates above 96%[5]. Tyrecycle and other recyclers have invested heavily in capacity here because the market fundamentals work. Additionally, the percentage of passenger and truck tyres that are **dumped and stockpiled represents half a percent of all tyres generated in Australia annually**[6].

OTR / Mining (Failure):

Mining (79%) and agricultural/forestry tyres (11%) account for 90% of OTR tonnes disposed annually, with a recovery rate of just **2%**[7].

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[4] https://storage.googleapis.com/tsa_craftcms_media/assets/pdf-resources/TSA0003-L8-OTR-40pp-Business-Plan-A4-WR.pdf. P.7

[5] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 48, Figure 30

[6] Page 62, Table 17.

[7] https://www.tyrestewardship.org.au/tools-and-resources/tipping-the-balance-research-report-off-the-road-tyres-conveyors-tracks. P.7

Sector	% of OTR Disposal	Estimated Tonnes	Recovery Rate
Mining	**79%**	**97,233**	**< 2%**
Agriculture & Forestry	**11%**	**13,539**	**< 2%**
Combined Total	**90%**	**110,772**	**~2%**
Other (Construction/Aviation)	**10%**	**12,308**	**~80%**
Total OTR Market	**100%**	**123,080**	**13%**

Tyrecycle Position: The trend is clear—the commercial sector is generally performing well; the mining sector is failing due to the allowance of in-pit disposal options for the mining sector. **Therefore, should policy intervention be required, it must be focused upon the failure (OTR)**, not where the market is performing well with passenger and truck tyres where:

- 96%[8] are collected
- the recovery rate increased 8% in the last year of reporting[9]
- dumping and stockpiling only equates to half a percent of all tyres generated[10].

2. *Investigating current practices in tyre reuse, retreading, recycling, and resource recovery, including reviewing federal, state, and local regulations governing tyre production, disposal, and recycling.*

Current practices in tyre recycling:

Australian recyclers maintain world-leading and advanced recycling capabilities for all tyres, with enough capacity to safely manage every waste tyre in Australia.

Tyrecycle plants are equipped with advanced rubber re-manufacturing capabilities processing in the order of 20 million tyres per annum (with a recycling rate of 99% of those tyres we collect) into products including rubber chips, granules and powders.

With infrastructure in place to service all of Australia's tyre disposal needs, recyclers require tyres that become a waste be disposed to a legitimate tyre recycler (and are not legally able to be disposed to landfill) and that once they are processed, there is a commitment to procure the recycled material.

Federal, state, and local regulations governing tyre production, disposal, and recycling

Tyre landfilling

The practice of **allowing landfilling of passenger and truck tyres (particularly in WA) and in-pit disposal at mines** is the most significant **regulatory barrier** to circular economy outcomes.

Current regulations allowing in-pit disposal and landfilling are the primary barrier to circularity. Tyrecycle has invested **$12.8 million** in OTR processing capacity in Port Hedland, yet this infrastructure is underutilised as it competes against cheap, legal landfilling from mining companies.

[8] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 48, Figure 30
[9] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 52, Table 11
[10] Page 62, Table 17.

The Economic Case for Regulatory Reform (OTR Ban): Tyrecycle analysis indicates that a ban on OTR landfilling in NSW, WA, and QLD would likely recover an additional **112,000 tonnes per annum**. Diverting this volume to the recycling sector would generate:

- **$90 million** in gate fees for recyclers (underpinning business viability).
- **$56 million** in recovered crumb rubber value.
- **$6.75 million** in recovered steel value.
- **~225 new jobs** and
- **~$45 million** in further equipment investment.
- Ensure tyres meet **National Waste Policy Action Plan Targets of 80% for all waste streams in Australia.**

Tyre stewardship

Tyrecycle recognises the importance of product stewardship in efforts to improve waste tyre sector outcomes.

While the recovery rate for passenger and truck tyres is high, perverse market outcomes associated with illegitimate operators occur. It is worth noting that according to TSA data[11], the percentage of tyres that *remained dumped, stockpiled, or retained onsite at the end of the 2023-24 financial year* was less that 1% (.89% of passenger tyres and .57% of truck tyres) for each category, **representing half a percent of all tyres generated in Australia annually**:

TYRE SEGMENT	VOLUME "REMAINING IN FLOW"	SEGMENT TOTAL GENERATION	% OF SEGMENT VOLUME
PASSENGER TYRES	1,700 tonnes	190,000 tonnes	**~0.89%**
TRUCK & BUS TYRES	1,100 tonnes	192,000 tonnes	**~0.57%**
TOTAL TYRES (AGGREGATE: INC. OTR)	**2,800 tonnes** (combined)	**537,000 tonnes**	**~0.52%**

Table 1: The estimated volume of passenger and truck tyres that remained dumped, stockpiled, or retained onsite at the end of the 2023-24 financial year.

However, Tyrecycle acknowledges that although this is a very small minority both in terms of volumes and the scale of operations relative to Australia's legitimate tyre recycling sector (which has capacity to process 435,000 tonnes annually[12]), this type of operation undercuts disposal fees to highly invested recyclers, contributes to unmanaged stockpile accumulation and dispersed dumping, thereby creating environmental and economic costs for industry, key stakeholders, the environment and community.

Regardless, highly invested recyclers do not want to see an overhaul of the tyre management system in Australia primarily predicated upon the mismanagement of tyres *that equate to around half of one percent of total volumes generated in Australia.*

Given these negative outcomes, Tyrecycle supports efforts to improve sector performance, however, proposes that any **reform should be particular and commensurate to the nature and the scale of**

[11] Page 62, Table 17.
[12] Page 62, Table 17.

the issues seeking to be addressed. Should a more overt mechanism be considered by the Inquiry, Tyrecycle proposes that any policy must:

1. focus on addressing clear and definitive market failures – such as mining tyre landfilling.
2. be market based and not interfere with existing highly invested recyclers that are providing good coverage and service.
3. focus on the source of tyre disposal issues – not the legitimate recycling industry.
4. not create inefficiencies and unnecessary burden upon on the high performing, legitimate tyre recycling industry.

Current practices in tyre retreading

The Australian tyre retreading market is now largely confined to the commercial (truck and bus) sector, with passenger car retreading effectively eliminated by low-cost imports that have made retreading uneconomic. Retreading persists primarily among large fleets using premium casings, where it remains cheaper over the tyre's life, while smaller operators have shifted to low-cost, single-use imports.

Despite delivering significant environmental benefits, including ~70% lower oil use per tyre, the retread market is in structural decline. Retreads once matched new truck tyre sales but now account for around one-third or less of the market[13], driven by competition from cheap imports, labour constraints, and the increasing prevalence of low-quality casings unsuitable for retreading—further reducing future retread capacity.

Tyrecycle Position: Landfill bans for all tyres should be implemented as a base policy position across Australia – regardless of whether enhanced stewardship is pursued or not. This low-cost regulatory mechanism is the most efficient way to realise a circular economy with the least unintended detrimental impact on markets and would instantly validate recent large-scale government and private investment in recycling infrastructure[14]. Of note is the $123 million investment made for tyre recycling by government ($41 million) and industry ($81 million) through the Recycling Modernisation Fund (RMF) (see Appendix 2 for more details).

Where the strengthening of stewardship mechanisms are considered, intervention must be precise and focused upon system failures, minimise unintended outcomes in high performing markets and not be at the expense of the legitimate tyre recycling industry that performs an essential service to the Australian community in a challenging operating environment.

3. Exploring technological advancements in tyre design, recycling processes, and alternative materials.

Tyrecycle and leading Australian recyclers have invested significantly in enough advanced recycling capacity to ensure all of Australia's tyres are processed into high value products. Australia has some of the most advanced recycling infrastructure in the world built upon the strength of the local passenger and truck collection markets.

The issue for Australian recyclers is **feedstock security** and **market demand.**

- **Feedstock security** can be addressed via landfill bans that would drive an additional volume of over 100,000 tonnes (mostly OTR) to the infrastructure recyclers have invested in.

[13] https://storage.googleapis.com/tsa_craftcms_media/assets/pdf-resources/TSA-Retreading.pdf
[14] Insert RMF tyre investment numbers

- **Market demand** can be secured by entrenched procurement commitments from government in consistent annual markets such as road construction.

Over the past five years Tyrecycle have invested heavily ($45,500,000 + $6,500,000 in RMF funding) in significant upgrades and capital improvement projects all over Australia[15] enabling the production of highly refined tyre derived product for inputs into advanced manufacturing, including micronisation and high-grade tyre production.

While Australian recyclers have invested heavily and have significant capacity to process Australia's waste tyres, equipment is being underutilised due to the allowance of landfilling. This investment in technology by Tyrecycle and other leading recyclers requires feedstock security and market demand to be commercially viable.

- **Supply Side:** Tyrecycle have the technology to recycle OTR tyres (investing $12.8 million in an OTR facility in Port Hedland) but we cannot compete with a hole in the ground. The government must "back in" its own investments (via the Recycling Modernisation Fund) by ensuring feedstock is not legally disposed in landfill.
- **Demand Side:** Innovation is futile without a customer. Government procurement specifications are the most powerful tool to drive demand.

Tyrecycle position: Government must complement technological and infrastructure investments with policy levers (such as landfill bans as the simplest mechanism with the least likely detrimental impact of existing high performing markets) to secure supply and procurement policies to secure demand.

4. *Identifying opportunities to develop high-value uses for waste tyres and tyre-derived materials, including applications in construction, manufacturing, and other commercial sectors.*

The recycling sector is playing its part in driving high-value tyre derived product development. With the significant investments Tyrecycle has made, we can produce high-end tyre-derived products (TDP) at scale. Tyrecycle plants are equipped with advanced rubber re-manufacturing capabilities processing in the order of 20 million tyres per annum (with a recycling rate of 99% of those tyres we collect) into products including rubber chips, granules and powders.

The Strategic Pivot: Domestic Energy and Sovereign Resilience

While international markets for tyre derived fuel (TDF) remain an active component of the global trade, Tyrecycle is strategically advancing a pipeline of **100,000+ tonnes per annum in domestic** TDF opportunities. By integrating TDF into Australia's high-energy manufacturing sector, we are enabling local industries to diversify their fuel mix and enhance their operational resilience.

This domestic expansion provides three core advantages:

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[15] New South Wales: Erskine Park/ Newcastle - 1.5 inch / Steel Cleaning / OTR Processing -$8,222,000
South Australia: $2,710,000
Western Australia

- Port Headland Australia OTR Processing - $9,824,000
- Perth crumbing plant - $15,648,000
- Tasmania: $2,533,000

- **Decarbonisation at Scale:** Displacing traditional fossil fuels with TDF in industrial kilns offers a significant carbon reduction pathway for Australian manufacturers. TDF generates approximately **60% fewer emissions than brown coal**, providing a high-heat, lower-carbon alternative.
- **Economic Multiplier:** Domestic processing keeps investment within the country, generating local employment and supporting sovereign manufacturing capabilities.
- **Supply Chain Resilience:** Utilising waste tyres onshore minimises the logistics and regulatory risks associated with international shipping, providing a more stable "closed-loop" solution for Australian waste.

Tyrecycle is currently advancing a pipeline of **100,000+ tonnes per annum** in domestic TDF opportunities. A landmark example is our agreement with **Cement Australia's Railton kiln**; by supplying 2" TDF, we are successfully utilising Tasmania's entire stream of passenger, 4WD and light truck waste tyres to power local industry.

Ultimately, the transition to domestic TDF is a pragmatic commercial evolution that secures Australia's industrial energy future and demonstrates a high-performing market that is leading the way in creating domestic demand without the need for centralised intervention.

The barrier to market is not technical; it is **commercial certainty**.

- The industry requires **ongoing, consistent demand** to maintain and support existing and RMF-funded investment.
- **Government procurement of TDP** (e.g., crumb rubber for roads) is essential.
- **Long-term contracts** for minimum tonnages, open for competitive tender by recyclers, would guarantee stable local outlets and underpin necessary capital investment.

Case study: Roads market:

Australia has one of the **largest markets for crumb rubber in roads of any territory in the world** with close to 30,000 tonnes being consumed annually. This level of demand for this highly refined and valuable product (which sells for up to $700 a tonne) is greater than the demand in any European or Canadian markets (including those with Extended Producer Responsibility (EPR) schemes), demonstrating that a market-based system is capable of robust outcomes, if supported by appropriate policy mechanisms, including government procurement policies.

Example: An example of successful government specifications to drive demand is VicRoads standard specification **Section 408 - Sprayed Bituminous Surfacings**, which sets the parameters for how crumb rubber is used in most rural and regional Victorian roads. According to Technical Note 107, the crumb rubber content by mass of binder varies with the sprayed seal type: VicRoads

- **Unmodified Seals**: up to 5% crumb rubber
- **Initial Seal & High Stress Seal**: 9% crumb rubber
- **Extreme Stress Seal**: not less than 15% crumb rubber

By encouraging crumb rubber to be used in roads to this degree, Vicroads is driving the consumption of around 750,000[16] tyres in Victorian roads annually. Standardising this practice nationally would ensure significant ongoing consumption, underpinning investment by the recycling sector, supported by government.

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[16] Figure derived from industry intelligence and engagement with the road sector, including road authorities.

Tyrecycle position: Recyclers have the products, and uses are established. Support is required to **underpin and increase demand** through policy and procurement to ensure the continued commercial viability of high-value uses.

5. *Evaluating the effectiveness of the existing circular economy models and identifying opportunities for research and development to support improved sustainable practices.*

A critical observation for the Committee is that domestic demand is not an automatic byproduct of a mandatory Extended Producer Responsibility (EPR) scheme. There is a common presumption that EPR is a prerequisite for market development; however, international evidence shows that centralised schemes often focus on the logistics of collection while failing to cultivate high-value end-use markets.

In contrast, Australia's success is a result of **business-led innovation**. The current competitive, market-based system is already highly effective, as evidenced by a **96% collection rate** for passenger and truck tyres[17], an 8% increase in recovery rates in 2024[18] (reaching **87%**), and the fact that dumping and stockpiling now equate to only **0.5%** of all tyres generated annually[19].

The demand for **30,000 tonnes** of crumb rubber in roads and Tyrecycle's pipeline of **100,000+ tonnes** per annum in domestic TDF opportunities have been built through commercial partnerships and technical excellence. The existing model is already delivering world-class outcomes; what is required to reach the next level of performance is targeted policy—such as landfill bans and procurement mandates—that backs in existing market strengths rather than replacing them with a bureaucratic clearinghouse.

The core issues for Australian recyclers are **feedstock security** and **market demand**, which are best addressed through specific policy levers:

- **Feedstock Security:** This can be addressed via **landfill bans** (specifically targeting the mining and OTR sectors). Such a move would drive an additional volume of over **100,000 tonnes** to the advanced infrastructure in which recyclers have already invested, significantly improving plant utilisation.
- **Market Demand:** Long-term market stability can be secured by **entrenched procurement commitments** from government in consistent annual markets such as road construction.

Ultimately, the Australian model proves that domestic resilience is driven by commercial offtake certainty and technical capability. Strengthening this sector should focus on supporting the high-performing markets already in place and addressing specific failures like OTR disposal.

6. *Considering the role of commercially viable product stewardship schemes and whether these should be made mandatory, and identifying infrastructure gaps in collection, processing, and recycling facilities.*

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[17] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 48, Figure 30
[18] Tyre Stewardship Australia: Material Flow Analysis Report 2023-24: Page 52, Table 11
[19] Page 62, Table 17.

Tyrecycle supports efforts to improve sector performance, however, proposes that any **reform should be particular and commensurate to the nature and the scale of the issues seeking to be addressed.** Should more overt mechanism be considered by the Inquiry, Tyrecycle proposes that any policy must:

1. focus on addressing clear and definitive market failures – such as mining tyre landfilling.
2. be market based and not interfere with existing highly invested market players that are providing good coverage and service.
3. focus on the source of tyre disposal issues – not the legitimate recycling industry.
4. not create inefficiencies and unnecessary burden upon on the high performing, legitimate tyre recycling industry.

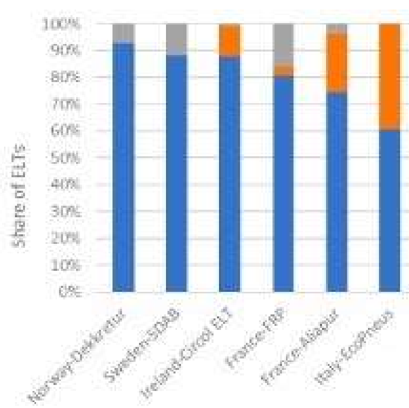
Stewardship Context in Australia

Tyrecycle commenced large-scale commercial recycling in Australia in 1993 and has been operating for as long as many established global EPR schemes (Tyre Stewardship BC in Canada since 1991, Aliapur in France since 2003). In this time, Australian recyclers have delivered outcomes comparable to the rest of the world and in some cases, are exceeding what European schemes can achieve in end market innovation (such as the roads sector).

For example:

- Australia uses tens of thousands of tonnes of crumb rubber in roads, far exceeding any territory in Europe, including those that have EPR schemes.
- Many territories in Europe that have EPR schemes have energy recovery rates comparable to that of Australia, as per the Graph 1, below:

Graph 1: Outcomes for ELTs in Western Europe, 2022[20].



Key: Blue is energy, Orange is granulation

These examples demonstrate that:

- high value market outcomes can be achieved with a market-based model and that any push for enhanced stewardship should not undermine these hard fought and important attributes to the Australian sector.
- having an EPR scheme does not necessarily correlate to higher value outcomes as current outcomes in Australia are comparable to many territories in Europe.

[20] Sourced from Australian Tyre Recyclers Association Research

While requiring further development and strengthening, Australia has an innovative and competitive market-based model with some of the strongest and most diverse markets in the world. These assets and investment should be respected and supported as we explore tyre management programs in Australia.

Challenges with EPR

Any efforts to bring an EPR scheme to Australia needs to recognise the challenges that pervade when applying such models to an Australian context.

Tyrecycle strongly oppose any move toward a centralised, bureaucratic agency that acts as a "single clearinghouse" for the industry as a centralised Extended Producer Responsibility (EPR) scheme poses significant risks to the current, highly invested market due to:

- **Market Disruption & Investment Risk:** A centralised EPR scheme replaces the current competitive, market-based system with a single authority controlling transactions. This change risks undermining the substantial investments made by existing Australian recyclers if the bureaucracy manages procurement uncompetitively.
- **Increased Cost & Inefficiency:** Centralised bureaucracies incur high administrative overhead that diverts funds away from actual recycling. Replacing competitive procurement also removes market discipline, potentially leading to higher operational costs and ultimately increasing prices for consumers, leading to inflationary risk to the economy.
- **Stifled Competition & Innovation:** Centralised control over the market's direction can limit access for new players and reduce the incentive to innovate, as the authority may lack the agility and flexibility needed to respond to immediate market signals and support the development of new, cost-effective technologies.
- **Unique Australian context:** No EPR schemes have been implemented for tyres in a territory the size and nature of Australia. EPR schemes in Canada and Europe are 'territory' or 'province' based and are generally for jurisdictions the size of the ACT of Victoria. Unique challenges will need to be addressed relating to the size, diversity and remote nature of much of Australia.

Focus on the source of issues

The Committee should be aware that the perverse outcomes associated with passenger tyre disposal mismanagement *comes from the disposer of the tyres – not the recyclers who are the providers of collection and recovery service.*

In this context, it is *some unscrupulous* tyre retailers that seek to avoid the true cost of disposal with legitimate recyclers that dispose cheaply that are the source of stockpiled and dumped[21] tyres. The stakeholder group with the most bearing on the circular outcomes associated with the disposal of passenger tyres (the main source of tyre dumping and mismanagement issues), is the tyre retailer sector. Therefore, Tyrecycle asserts that any considerations for overt policy reform should not unfairly disadvantage recyclers, but be focused upon the stakeholder group that have the largest bearing on the achievement of circular economy outcomes via their service procurement choices.

[21] This is because almost all passenger tyres (the type that are dumped most prevalently) are accumulated at tyre retailers when consumers procure new tyres and have old ones taken off to be replaced.

Tyrecycle Position: Australia has a high performing market that should be respected. EPR schemes do not necessarily correlate to higher value outcomes. Keep the *logistics and commercial relationships* competitive. This will ensure the market continues to lead and innovate and is not stifled by a centralised bureaucracy.

7. *Investigating environmental, community, and health and safety concerns related to tyre waste and recycling operations.*

Environmental risks in this sector are driven by **non-compliant operators** and **mining disposal practices**, not legitimate recyclers.

- **In-Pit Disposal:** The practice of burying millions of tyres in mining pits creates long-term environmental liabilities (fire risk, contamination) and wastes valuable resources.
- **Rogue Operators:** The current system too easily allows unscrupulous tyre retailers to procure collection services from illegitimate operators to undercut the market by stockpiling unsafe volumes.

Tyrecycle Position: Regulatory enforcement should focus on the *source* of the issue (retailers using cheap/illegal collectors) and the *disposal point* (mines), rather than adding red tape to highly compliant, ISO-certified recyclers like Tyrecycle.

Concluding remarks

Tyrecycle supports all efforts to realise a circular economy for tyres and thanks the Committee for the opportunity to provide this submission. We also welcome the opportunity to engage further and invite committee members to visit our world leading recycling sites to learn more about this important issue.

Tyrecycle is ready to invest further in Australia's domestic capability. To unlock this investment, we do not need a new bureaucracy to run the industry.

We welcome the opportunity to discuss these matters with the Committee.

Yours sincerely,

[redacted]

E: [redacted]
Chief Executive Officer
Tyrecycle

Appendix 1: About Tyrecycle

Tyrecycle is the only producer of tyre derived products nationally that can guarantee a full chain of custody from cradle-to-grave for domestic and off-shore customers; ensuring that all manufactured products are utilised in an environmentally sound way.

Tyrecycle plants are equipped with advanced rubber re-manufacturing capabilities processing in the order of 20 million tyres per annum with a recycling rate of 99%, producing high quality repurposed material for the local and global market.

Tyres are recycled at secure facilities across our footprint into products including rubber chips, granules and powders that can be used in a variety of innovative applications. Tyrecycle's aim is to discover new applications for scrap tyres, avoiding tyres being sent to landfill.

As part of Tyrecycle's national operations, over the past five years have invested heavily ($38,000,000) in a number of significant upgrade and capital improvement projects. There are also a number of new facilities in the pipeline that will further expand our footprint and benefit the industry.

Current Relevant Projects

New South Wales: Erskine Park/ Newcastle - 1.5 inch / Steel Cleaning / OTR Processing -$8,222,000

South Australia: 2in Chipper CM - clean cut chip - $2,710,000

Western Australia

- Port Headland Australia OTR Processing - $9,824,000
- Perth crumbing plant - $15,648,000

Tasmania: 2 in Chipper CM - clean cut chip - $2,533,000

Tyrecycle holds the necessary environmental regulator licences and permits as well as advanced management systems comprising inspection and auditing, training and competencies, risk and hazard management and other legal requirements. Tyrecycle is certified across the 45001:2018 Health and Safety), ISO 14001 (Environmental Management) systems and ISO 9001 (Quality Management).

Appendix 2: Recycling Modernisation Fund Investment

State	Project Name / Recipient	Govt Funding (State + Fed)	Industry Contribution (Est.)	Total Project Investment	Annual Capacity (Tonnes)
NSW	7 Star Tyres Pty Ltd	$745,184	$1,500,000	**$2,245,184**	8,500
NSW	Traco Pty Ltd	$343,366	$700,000	**$1,043,366**	*Not specified*
NSW	Tyrecycle (Erskine Park)	$2,900,000	$5,800,000	**$8,700,000**	50,000+
QLD	Carroll Engineering Services	$500,000	$1,000,000	**$1,500,000**	8,000

QLD	Solar Recovery / Banana Shire	$3,370,000	$6,700,000	**$10,070,000**	*Mixed Stream*
SA	Tyrecycle (Lonsdale)	$962,000	$1,900,000	**$2,862,000**	15,000
TAS	Tyrecycle (Stowport/Bridgewater)	$1,500,000	$3,000,000	**$4,500,000**	10,000
VIC	City of Yarra / Uni of Melb	$90,000	$75,000	**$165,000**	*Trial Project*
VIC	Porous Lane Pty Ltd	$40,000	$40,000	**$80,000**	*Innovation*
VIC	Tyrecycle (Somerton Upgrade)	$1,800,000	$3,600,000	**$5,400,000**	15,000
WA	4M Waste Pty Ltd	$2,970,000	$6,000,000	**$8,970,000**	12,000
WA	Complete Tyre Solutions (Rnd 1)	$3,500,000	$7,000,000	**$10,500,000**	9,000+
WA	CTS Tyre Recycling (Round 2)	$4,500,000	$9,000,000	**$13,500,000**	3,624
WA	East-West Pilbara Rubber	$675,000	$1,350,000	**$2,025,000**	12,000
WA	Elan Energy Matrix Pty Ltd	$357,867	$715,000	**$1,072,867**	~7,000/day
WA	Kariyarra - Tyrecycle JV	$6,900,000*	$13,800,000	**$20,700,000**	27,000
WA	Matters Ent. (RubberGem)	$5,000,000	$10,000,000	**$15,000,000**	*Not specified*
WA	Tyrecycle Pty Ltd (Rockingham)	$5,190,000	$9,600,000	**$14,790,000**	42,000
TOTAL	**National Investment**	**$41,343,417**	**$81,780,000**	**$123,123,417**	**~212,124+**

*Note: The $6.9M for Kariyarra-Tyrecycle is included in the funding totals as it was a committed RMF allocation, even though the project eventually moved to independent delivery.