



The Research Director  
Agriculture, Resources and Environment Committee  
Parliament House  
BRISBANE QLD 4000  
By Email

12 September 2014

Dear Sir/ Madam

**ATRA submission to Environmental Protection and Other Legislation Amendment Bill 2014 committee**

The Australian Tyre Recyclers Association (ATRA) represents the legal, safe and ethical used tyre recycling industry in Australia. Our national membership includes collectors and processors of used passenger; mine, off road and other used tyres and additional rubber products. These processed tyres are then used as a fuel substitute, in roads, playgrounds and racetracks, in industrial adhesives manufacturing and civil construction.

All of our members are independently audited monthly including annual site visits and satellite monitoring. Our retail partners include all the major tyre retail brands including Bob Jane, Beauforepairs, Bridgestone, Jax Quickfit, Kmart, Summit as well as independent tyre retailers, department of defence and mining companies.

We are pleased to have the ability to make a submission to this inquiry.

Our principal concern is with any dilution of the existing regulatory regime associated with used tyre collection, storage and disposal in QLD. ATRA's QLD members are primarily SME's and family owned businesses. They operate to all legal requirements as well as ATRA's constitutional principles. The greatest risk to these safe, legal and legitimate operators is rogue operators that take advantage of lax regulations or as in the case of QLD loop holes in the existing rules. As such, ATRA members overwhelmingly support appropriate and tighter regulations, not less.

The guidelines associated with this inquiry suggest this bill is part of a second tranche of 'green tape' reduction. Unfortunately, an initial round of 'green tape' reduction in QLD has had a negative impact on QLD tyre recycling businesses. Specifically, the removal of the provision for a used tyre collector to have a licence, where these operators had no processing equipment – and therefore simply 'stored' these used tyres, has resulted in rogue operators entering the market.

These rogue operators have and are now dumping hundreds of thousands of used tyres on sites around Brisbane (including at Pineknba and Mt Crosby) creating environmental liabilities as well as fire risks and we have made these issues known to Minister Powell who shares our concern with these developments.

These stockpiles undercut legitimate family owned QLD businesses. They do so by undercutting on the fee the collectors charge tyre retailers for collection, due to their having no processing costs. And in the

case on the Pinkenba site have defaulted on their lease and left the site owner with a substantial financial liability.

These stockpiles additionally pose a substantial fire risk and environmental and public health hazard. We are aware, for instance, that Brisbane Airport Corporation are concerned with the Pinkenba tyre stockpile in terms of any possible fire risk associated with the airports flights paths.

ATRA would urge caution with any additional reductions in regulations associated with used tyre recovery, storage and processing. We would be happy to provide further representation as and when required.

I can be contacted at [robertkelman@iinet.net.au](mailto:robertkelman@iinet.net.au) or 0423573278

Regards

A handwritten signature in blue ink, appearing to read 'Rob Kelman', with a stylized flourish underneath.

Rob Kelman  
Executive Officer  
ATRA