

Australian Tyre Recyclers Association Position Statement regarding the Export of Whole Baled Tyres from Australia.

The ACOR Board has asked for a brief overview of ATRA's position regarding this export.

Introduction

ATRA members collect and process around 23Million used tyre units p.a. These are converted to tyre derived fuels (TDF) replacing coal in cement kilns in Japan and South Korea – for every one tonne of TDF replacing one tonne of coal, one tonne of CO₂ is displaced (<http://atra.org.au/wp-content/uploads/2017/05/TDF-GHG-Report-final.pdf>).

ATRA members also produce rubber crumb for soft fall surfaces and asphalt as well as civil work applications.

There are an additional approximate 5Million used tyres baled and exported from Australia from non-ATRA members.

ATRA members unilaterally banned from the association's membership criteria the export of whole baled tyres, around five years ago, on the basis that:

- Bales of whole tyres can carry water and therefore mosquito larvae and diseases – UN WHO identify used tyres as one of the primary vehicles for the global spread of such diseases
- The end destination of these tyres is almost certainly a poor environmental outcome and this has been demonstrated. This recent Guardian UK article bears testament to the imposition of UK (Australian waste whole tyres go to the same fate) tyre waste on developing countries
<https://www.theguardian.com/commentisfree/2019/jan/30/worse-than-plastic-burning-tyres-india-george-monbiot>

A detailed account of ATRA's position on whole baled tyre exports can be found here <http://atra.org.au/wp-content/uploads/2017/06/TSA-baling-report.pdf>

In 2017/ 2018 ATRA undertook a waste tracking project, culminating in Rob Kelman travelling to India and Malaysia to witness where Australian bales of whole tyres finished their productive life.

More detail is available upon request and in summary:

- ATRA purchased 10 GPS satellite trackers and placed them inside bales of tyres leaving Australia for Malaysia and India
- These bales were on sold within these countries and multiple bales within a single shipping container ended up in multiple destinations from 2000km's north (near the Nepalese border) or 600Km's east in the centre of the country
- This included going to pyrolysis operations as well apparently for use in open burning to preheat drying kilns
- An Indian tyre manufacturing industry survey concluded that around 20% of used tyres are applied to open burning and an additional 30% for pyrolysis

- There is major concern with the approximately 800 largely 'backyard' pyrolysis operations in India (a 'field study' by an Indian used tyre recycler regarding pyrolysis compliance is attached to this brief) from both environmental and human health perspectives
- There is based on our GPS tracking project no-way to verify where bales of whole tyres end their life in India
- Equally, Reuters recently highlighted the nature of this sector in Malaysia
<https://uk.reuters.com/article/uk-malaysia-poisoning-oil-insight/burning-tyres-the-murky-oil-business-polluting-parts-of-asia-idUKKCN1T10AY>

ATRA's objectives regarding this export are:

- Have Tyre Stewardship Australia (TSA) implement its position regarding bales and ban the practice from its accreditation criteria
 - o This is being actively developed between TSA and ATRA
- Building a global position with ATRA equivalents in other countries
- Working with various BASEL convention processes to have this agreement ban the export of unprocessed used tyres (as they have recently regarding mixed waste plastics)

END