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Greentape Standard Applications Consultation

Reform and Innovation Division

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Introduction

ACOR is the peak national industry body for the resource recovery and recycling industry. ACOR aims to engage with and advises governments on the practical implications of policy and regulation to promote delivery of sustainable business infrastructure necessary to achieve major improvements in resource recovery and remove rogue operators, into a productive economy.

The Greentape Reduction Policy (GRP), and the associated draft eligibility criteria and standard conditions for environmentally relevant activities (ERAs) 59- Tyre recycling undermine the operation of legitimate tyre recyclers and fails to address social and environmental risks in relation to tyre storage/ stockpiling.

The cost of tyre recycling is not reflected in the value of recycled products

Under the current regulation, the cost of tyre recycling is not covered in the value of finished recycled product. This is due to tyres being made not to come apart from materials, such as rubber, steel and fibre, which are required for performance and safety on the road. Furthermore, other costs associated with regulation compliance and approvals for tyre recycling make the operation cost of recycling tyre more extreme compared to other products.

The draft prescribed ERAs should take into consideration of the entire tyre supply chain, including tyre and vehicle importers, retailers, fleet operators, tyre collectors and recyclers. Regulations are also required to ensure operators that charge customers to collect tyres for

recycling actually recycle and/or dispose them without negative impacts on environmental and human health.

Social and Environmental hazards and risks associated with used tyre storage

Since the removal of tyre storage under Schedule 2- Prescribed ERAs in the *Environmental Protection Regulation 2008* (EPR), the problem of tyre stockpiling has re-emerged. Rogue operators and organised criminals typically pay less for the removal of tyres than legitimate recyclers and claim that the collected tyres are stored “temporarily”. However, they do not have any intention of recycling or disposing of them responsibly. As a result, used tyres are stockpiled in facilities that are not purpose built to combat the risk of long lasting “oil fires” generated by waste tyres.

Furthermore, these rogue operators often dispose of tyres below the cost of legitimate recyclers in rented premises without the knowledge of property owners then leaving either the owner or government to pay for proper recycling or disposal. Although there are penalties in place for illegal dumping, the penalties that apply to these criminals are grossly insufficient to break their business model. With over 1 million end of life tyres in Queensland annually the profits are considerable and flow to the worst elements of society.

In addition, tyre stockpiling has significant hazards and risks, including fire, leaching, mosquitoes, weeds and vermin. As you may recall, two disastrous fires caused by tyre stockpiling in Salisbury and Willawong resulted in life lost and causing over \$15 million in damages. In the Salisbury fire, all local water had to be diverted for a sustained period to put out the fire.

Tyre fire not only causes serious air pollution, but can potentially pollute nearby rivers and streams. This could also result in contaminated soil due to the run off from the burning tyres leaching into soil. Burning tyres also creates highly toxic black smoke which has an adverse impact on human health, local wildlife and atmospheric conditions.

The *Environmental Protection Act 1994* clearly states its object is to “protect Queensland’s environment while allowing for development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends”.

While tyre stockpiling has adverse impacts on human health and the environment, there is no regulation in place to address the issues of tyre storage/ stockpiling. The current regulation fails to fulfil the object of the Act.

Strict storage and processing licenses in Queensland was the primary lever that the Department of Environment and Heritage Protection could use to ensure tyres that were collected for recycling were properly recycled or disposed. Increased effort in policing to combat tyre stockpiling should be also considered in current regulation.

Conclusion

The EPR and the associated regulations for tyres do not consider the entire supply chain and overlooks the adverse social and environmental impacts of tyre storage/ stockpiling. Current regulation fails to address the social and environmental risks with regards to human health, local wildlife, and air and water pollution. ACOR's risk assessment is attached.

Waste tyres represent one of the most significant and dangerous wastes if they are not managed appropriately. The draft risk assessment is not accurate and not sufficient to address the potential risks of waste tyres storage and handling. Legitimate recyclers are facing extreme financial hardship with the loss of hundreds of jobs and millions of dollars in investment.

ACOR urges the Department and the Minister to review the draft to ensure regulation will be in place to combat tyre stockpiling. ACOR welcomes the opportunity to contribute to the review of the draft and stand ready to advise government following the outcomes of the consultation.

Yours sincerely,



Grant Musgrove

Chief Executive Officer