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Productivity Commission  
Locked Bag 2, Collins St East  
Melbourne Vic 8003  
*By email: [circular.economy@pc.gov.au](mailto:circular.economy@pc.gov.au)*

Dear Sir/Madam

## **SUBMISSION: OPPORTUNITIES IN THE CIRCULAR ECONOMY INQUIRY**

### General Introduction

CTS Tyre Recycling is a West Australian founder-led business managed by an experienced Managing Director with significant tyre industry experience and a Chief Operating Officer with significant experience in dealing with end-of-life-tyres. Additionally, our company's Production Manager previously held leadership roles at major tyre recycling, waste management and manufacturing plants in Kuwait and India, including at one of the largest tyre recycling facilities in the Middle East

CTS Tyre Recycling was born out of the desire of our parent company Complete Tyre Solutions to operate in a more sustainable fashion. As a result, CTS Tyre Recycling is making a long-term investment (>\$40 million) in the tyre recycling sector. We also recognise industry requirements for dependable and viable tyre disposal solutions for Western Australia.

Our new facility is the first in Australia to have the capability on a single site to receive and process tyres of all sizes, from small lawn and garden tyres through to the largest Off The Road surface mining tyres used on mine haul trucks.

Beyond recycling to produce TDF, crumb rubber and clean steel, CTS Tyre Recycling has extended its service offering with the purchase and installation of advanced rubber moulding equipment to produce a range of high-value speciality rubber products, including acoustic underlay and a range of rubber matting suitable for soft-fall flooring, gym matting, load restraint matting and other uses.

The plant represents best practices in both tyre shredding and rubber product moulding technology with the capability to produce a range of remanufactured rubber products.

Not only are we creating value from waste, but we will have the unique ability to guarantee a chain of custody from end-of-life tyres into sustainable value-added rubber products.

We further intend to create a new brand, Upcycled Rubber or similar, that will be launched with the intention of becoming a highly visible brand that companies can partner with to promote the joint objectives of removing waste from landfill and helping to build a circular economy.

CTS Tyre Recycling has, and appreciates, the support of the state and federal governments in delivering this project.

#### Our Submission

Our submission is simple.

CTS Tyre Recycling supports **in its entirety** the comprehensive submission made to this Inquiry by the Australian Tyre Recyclers Association (ATRA).

Our Company specifically endorses the opportunity for the PC to support policy action that could change the widespread current practice of end-of-life OTR tyres and conveyor belt rubber being sent to landfill.

The ATRA submission contends that some 130,000 tonnes of OTR tyres and as much as 115,000 tonnes of conveyor belt rubber being disposed of in Australia each year. Most of that disposal is by way of landfill with little or no future site remediation work.

Our facility alone has capacity to recycle 60,000 tonnes per annum.

At this time, there is no legal requirement for the largest miners (or any miner) to recycle these massive tyres, each of which can weigh up to five tonnes. We don't expect there is any real prospect of recovering the tyres and belts already buried, however we believe that, with encouragement from government, they could be persuaded to return future EOLTs to Perth on the same road trains (purpose-designed to carry OTR tyres) that carry them to their sites.

In addition to reducing landfill disposal, our recycling initiatives will reduce the need for further virgin product, leading to a sustainable path towards a true circular economy for one of the world's most used circular products..

Kind regards

**Leigh Cometti**  
**Managing Director**

ENDS