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Date: 3 April 2024

From

To

Mr David Hatfield
Director Adjudication
Australian Competition and Consumer
Commission (ACCC)
david.hatfield@accc.gov.au

Dear Mr David Hatfield

Re: These are the type of outcomes we are looking for from the Tyre Stewardship Australia review.

1. Prevent the TSA from being involved in any part of government licence and permit approval processes due to their conflicts of interest with industry. As the TSA is using their organisation as a vehicle to access information on non-members international and domestic customers and their business processes, for the benefit of their members.
2. Sever penalties needed to be imposed on the TSA to discourage abuse of market power, scare mongering, market interference, and reporting inaccurate and misleading information to industry. The TSA should be made to publicly explain their misconduct.
3. A stricter code of conduct should be introduced for all staff employed by the TSA to increase accountability and discourage misconduct. Background checks should be performed to reduce risk and improve information security, conflicts of interest must be disclosed.
4. Penalties and restrictions must be imposed on the TSA to prevent and discourage cartel type behaviour within their organisation.
5. The TSA's constitution should be amended to restore members rights regarding who they do business with outside the TSA, to create a more inclusive environment.
6. The accuracy of all milestones achieved and financial statements made by the TSA need to be confirmed. Audits need to be conducted on the TSA's performance by a reputable organisation approved by the ACCC to restore public trust and transparency.
7. More scrutiny needs to be placed on how funds are spent.
8. Their needs to be greater diversification on the board of the TSA
9. Their needed to be a process established where all complaints related to the TSA can be safely reported to government and investigated.
10. Ther terms of what the TSA can do and not do within industry need to be more clearly defined.

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11. The ACCC needed to restrict what information the TSA can request from a member, to prevent the misuse of information. As at the end of the day, only government can approve and issue licences and permits. The accreditation is of no real value.
12. The TSA needed to more clearly describe, if they where reauthorised how that would benefit industry.
13. Their needed to be a review conducted on all staff employed by the TSA already, to access their performance, role and responsibilities, attitude and contribution to date.
14. The TSA needs to have a solid plan in place which clearly defines their objectives and deliverables with dates specified of when specific outcomes and milestones will be achieved.

Sincerely,

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