

Submission by Blue Environment Pty Ltd-11 June 2024

This brief submission responds to the draft Determination's commentary under the heading 'sufficient transparency in data reporting' and Appendix B. Blue Environment is a consulting company specialising in waste and resource recovery, with particular strengths in data and modelling. We are longstanding authors of the biannual National Waste Report and the annual Australian Plastics Flows and Fates study. Our director Kyle O'Farrell (then at Envisage Works) was the primary author of the original model described in the 2019 Randell Environmental Consulting report 'End-of-life tyres supply chain and fate analysis'. We advise that we are currently working with TSA to review and improve its modelling, which is substantially changed since the original version. On 12 April 2024 we submitted a report to TSA stating that: "In our preliminary opinion, the model produces high quality estimates of the generation and fate of different types of end-of-life tyre. The theory is robust; the method is sound; the data used is the best we are aware of; and the assumptions seem sensible". We continue to work with TSA to improve the model, especially in relation to fates and the communication of uncertainty.