TyreStewardship AUSTRALIA

AUDIT HANDBOOK – FOR COLLECTORS AND RECYCLERS

OCTOBER 2020

PURPOSE OF THIS HANDBOOK

The purpose of this handbook is to develop a shared understanding among parties involved in the Tyre Product Stewardship Scheme audit and compliance activities for Collectors and Recyclers.

This Handbook sets out the processes that apply to Tyre Stewardship Australia (TSA) audits, assessment of accreditation and compliance, and steps to resolve non-compliance. It ensures transparency in relation to TSA audits and explains what Collectors and Recyclers are required to do before, during and after an audit.

TSA manages audits of Scheme Applicants and participants, including Collectors and Recyclers and reports to the TSA Board.

The Handbook should be read in conjunction with the *Tyre Product Stewardship Scheme Guidelines* which sets out the requirements that apply to Participants, including Collectors and Recyclers.

All Scheme documents, including this Handbook, are available on the Internet at tyrestewardship.org.au.

Further information contact TSA:

Tyre Stewardship Australia
Phone: (03) 9977 7820
Email: getonboard@tyrestewardship.org.au
Website: tyrestewardship.org.au

CONTENTS

INTRODUCTION 5

1.1 THE TYRE PRODUCT STEWARDSHIP SCHEME 5

1.2 ACCREDITATION CONDITIONS 7

ACCREDITATION AND COMPLIANCE PROCESSES 9

2.1 OBJECTIVES OF THE TYRE PRODUCT STEWARDSHIP SCHEME AUDIT AND COMPLIANCE PROGRAM 9

2.2 OBTAINING TSA ACCREDITATION 9

2.3 TYRE PRODUCT STEWARDSHIP SCHEME AUDITS 10

2.4 DEFINITION OF A TYRE PRODUCT STEWARDSHIP SCHEME AUDIT 11

2.5 CONFIDENTIALITY AND PRIVACY 12

2.6 SUSTAINABLE OUTCOMES FOR EOLT 13

2.7 EMPLOYEE ENTITLEMENTS DECLARATION 13

2.8 NON-COMPLIANCE ENFORCEMENT – SUSPENSION OR REVOCATION OF SCHEME ACCREDITATION 14

2.9 TSA PROCEDURE TO ADDRESS REGULATORY NON-COMPLIANCE (EFFECTIVE JAN 2018) 15

DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES 17

3.1 ACCREDITATION AUDITS 17

3.2 ANNUAL COMPLIANCE AUDITS 18

SCOPE OF ACCREDITATION/COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS 19

4.1 SCOPE OF AUDITS 19

4.2 FOREIGN END MARKET PROGRAM 22

4.3 FEM PLATFORM 22

REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS 23

ATTACHMENT 1 COMMITMENTS AND COMPLIANCE 24

ATTACHMENT 2 TSA SCHEME RISK RATING METHODOLOGY 26

ATTACHMENT 3 ACTION PLAN TEMPLATE 28

ATTACHMENT 4 SELF-AUDIT CHECKLIST FOR COLLECTORS AND RECYCLERS 29
TSA GUIDELINE REQUIREMENTS 30
GENERAL REGULATORY REQUIREMENTS 37

INTRODUCTION 1

INTRODUCTION
ACCREDITATION AND COMPLIANCE PROCESSES
DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES
SCOPE OF ACCREDITATION/ COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS
REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

1.1 THE TYRE PRODUCT STEWARDSHIP SCHEME

The Tyre Product Stewardship Scheme (**the Scheme**) is a voluntary industry Scheme that commenced on 1 July 2014 and received its ACCC re-authorisation in June 2018. Its objective is to:

- increase resource recovery and recycling and minimise the environmental, health and safety impacts of all end-of-life tyres (EOLTs) generated in Australia
- develop Australia's tyre recycling industry and markets for tyre derived products. Tyre Stewardship Australia (**TSA**), is a not-for-profit company limited by guarantee, funded by tyre importers, and is responsible for administering the Scheme
- Participants in the Scheme commit to play their part in ensuring EOLTs are disposed of in a way that represents environmentally sound use.

There are several Participant categories in the Scheme:

- Tyre importers and Vehicle importers
- Retailers (including car dealerships)
- Fleet operators
- Local governments
- Collectors
- Recyclers
- Miners.

Businesses and organisations apply to become accredited Participants in the Scheme. On becoming accredited Participants, they are required to meet the commitments that are relevant to them. These commitments are set out in the *Guidelines for the Tyre Product Stewardship Scheme* (**the Guidelines**).

All Participants in the Scheme must commit to the following:

- support the objectives of the Scheme (above)
- deal transparently and ethically with others involved in the tyre supply chain, including consumers
- promote the Scheme to the community, other businesses and organisations, as directed by TSA
- use the Scheme's branding and logo and adhere to the conditions that apply to that use, as directed by TSA

- comply with relevant laws and practices, including those that relate to the environment, occupational health and safety and employment[1]
- co-operate with audits, provision of required documents and undertake surveys as directed by TSA, and
- report requested data to TSA as directed by TSA.

All Participants in the Scheme must also commit to contribute to:

- the environmentally sound use of EOLTs
- elimination of the inappropriate export of baled tyres from Australia
- elimination of the illegal dumping of EOLTs
- elimination of disposal of EOLTs to landfill (except where no viable alternative is available and subject to state and territory legislation; for example, in rural and remote areas where appropriate recycling facilities are not available, or transportation costs are prohibitive).

Collectors and Recyclers play important roles in the Scheme, and are defined as the following:

Tyre Collector means an individual, business or organisation that collects and/or transports end-of-life tyres in any part of Australia for recycling, reuse or disposal. If you are a transporter you are also a Collector; and

Tyre Baler means an individual, business or organisation that compacts end-of-life tyres into dense bales for the purposes of aggregation and transport. Balers may bale tyres for transport within Australia or to overseas destinations for further reprocessing. For the purposes of TSA participant categories, a baler is classified as a Collector. Noting as of March 2020, TSA will no longer accept new applications from operators baling whole tyres for export (as per TSA Baling Position).[2]

Tyre Recycler means a business or organisation recovering rubber, steel, textile and/or other materials and processing it into a form of tyre-derived product, whereby it can be used as a raw material in the manufacture of finished products, or to recover energy from end-of-life tyres.

If a business satisfies the definitions of both Recycler and Collector, they are required to submit applications to be a Participant in both of these categories.

1 Where breaches of regulations occur, TSA accredited Collectors and Recyclers are required to report to TSA as per the TSA Regulatory Breach Procedure (refer to section 2.7).

2 TSA Baling Position Statement: https://www.tyrestewardship.org.au/news/tsa-advice-baling-position-statement/

Collectors and Recyclers have specific, additional commitments, these are:

For Collectors to:

a. ensure all EOLTs collected from retail and other outlets with a recycling/disposal gate fee are passed to tyre recyclers accredited by TSA
b. provide data (report) to TSA as directed by TSA
c. deal ethically and transparently with retailers and other outlets, specifically in relation to the fees and charges associated with disposal of EOLTs.

For Recyclers to:

a. guarantee that all end-of-life tyres received from Collectors go to an environmentally sound use
b. provide data (report) to TSA as directed by TSA, on the number and fate of tyre EPU/tonnes processed and sold or otherwise provided for an environmentally sound use.

1.2 ACCREDITATION CONDITIONS

Where an Applicant (or a related body corporate of the Applicant or a current or former Participant which has a director, secretary, officer, employee or other personnel in common with the Applicant) has had accreditation under the Scheme suspended or revoked or has otherwise been non-compliant with the Scheme (including the general and specific commitments of Scheme) then this may raise concerns about the ability of the Applicant to meet the general and specific commitments of the Scheme relevant to the accreditation being applied for under an Application. As a result, TSA reserves the right to:

- request that the Applicant provide further information in order to demonstrate that the circumstances leading to the previous suspension/revocation/non-compliance have been resolved and will not impact on the ability or capacity of the Applicant to meet its commitments under the new accreditation; and
- grant accreditation subject to the Applicant complying with additional conditions specified by TSA (such as additional site inspections over a given timeframe) to ensure ongoing compliance with Scheme commitments; and/or
- reject the Applicant's Application.

Participants must comply with and otherwise meet the general and specific commitments and obligations which apply to the Participant under the Scheme at all times. To ensure that this occurs, TSA may:

- verify information submitted by Applicants and conduct informal reviews of this information from time to time; and
- conduct audits of a Participant's activities and processes.

A Participant must notify TSA immediately if it can no longer meet its general and/or specific commitments under the Scheme.

Participants must immediately inform TSA in writing of any changes to their business operation, including:

- the Participant's business moving to a new location and/or setting up an additional operation at a new location[3]
- a change of ownership of the Participant, sale of any part of the Participant's business or if the Participant ceases to trade or is otherwise insolvent
- the commissioning of new equipment and/or changes to operations of the Participant
- significant business disruptions to the Participant (such as, but not limited to, disasters including fire or flooding, or equipment damage or malfunction) that will inhibit the operations of the Participant or any location at which is accredited
- the Participant receives any regulatory notice/order/fine. Refer to Section 2.8
- arrangements for the collection and recycling of EOLT change with respect to the use of Participant.

Change to a Participant's business, such as those changes that materially impact the ability of the Participant to operate as provided for in the Participant's Application may require TSA to re-audit the Participant, particularly where a Participant has moved to a new location or is conducting operations at a location that was not included in the Application or is different to any previous audit.

3 A business moving to a new location and/or setting up operations or business at an additional location must apply for accreditation for each new or additional location. Businesses with multiple locations must have each location separately accredited.

ACCREDITATION AND COMPLIANCE PROCESSES 2

INTRODUCTION
ACCREDITATION AND COMPLIANCE PROCESSES
DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES
SCOPE OF ACCREDITATION/ COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS
REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

2.1 OBJECTIVES OF THE TYRE PRODUCT STEWARDSHIP SCHEME AUDIT AND COMPLIANCE PROGRAM

TSA's Audit and Compliance Program is designed to achieve the following objectives, not necessarily set in order of priority:

- Ensure that the Scheme achieves the desired environmental outcomes.
- Mitigating risks that may result in harm to human or environmental health.
- Ensure that Collectors and Recyclers honour and work in compliance with their commitments to the Scheme.
- Improve the level of compliance with the Scheme's commitments, aiming to achieve best practice site management.

2.2 OBTAINING TSA ACCREDITATION

A Collector or Recycler must complete the steps below in order to obtain TSA accreditation.

1. Collector/Recycler submits online application, that includes an outline of the operations, and an Action Plan.

2. TSA will contact applicant to confirm details and request further documentation, prior to scheduling a site audit.

3. Collector/Recycler provides requested documentation to TSA for verification.

4. Once satisfied with the documentation provided, TSA will arrange a site audit at Collector/Recycler applicant site.

5. A site audit is completed and reviewed by TSA. The audit report that TSA will provide to the Collector/Recycler applicant contains a list of outstanding issues to resolve (if applicable). These issues must be updated into the applicant's formal Action Plan with timeframes for completion, depending on severity of finding (see Attachment 2, Table 2).

6. TSA management will review all documents and decide whether to recommend applicant to the TSA Board for accreditation.

7. TSA Board approves accreditation recommendation. Collector/Recycler applicant becomes TSA accredited.

2.3 TYRE PRODUCT STEWARDSHIP SCHEME AUDITS

TSA audits assess whether an applicant (Collectors/Recyclers) meets and complies with the commitments that their organisation has made to the Scheme.

Collectors and Recyclers are required, regardless of their status as Participants in the Scheme, to comply with all relevant legislation and regulatory obligations that apply to them in the jurisdiction/s in which they operate. Therefore, a TSA audit does not necessarily assess compliance with all legislation or regulation, however it does assess compliance with commitments made by the Participant regarding complying with relevant legislation.

2.4 DEFINITION OF A TYRE PRODUCT STEWARDSHIP SCHEME AUDIT

A TSA audit is a systematic and documented verification process of objectively obtaining and evaluating audit evidence to determine whether a Collector/Recycler in the Scheme is compliant and meets its commitments as set out in **the Guidelines** (and the TSA Accreditation Logo Style Guide[4]).

The key purpose of a TSA audit is to determine whether the Collector/Recycler is in compliance with the relevant commitments they have made to the Scheme. The scope of a TSA audit is limited to the collection of evidence that relates to compliance or non-compliance with those commitments. A TSA audit does not extend to any other matters.

A strong and well-resourced audit regime is essential to protect the credibility of the Scheme and the interests of Participants.

As a voluntary initiative, the Scheme largely relies on self-regulation to achieve compliance, supported by robust administrative processes. Audits play an important role in establishing and maintaining the credibility of the Scheme and improving the level of compliance through feedback and education. Identification of non-compliance may result in a Collector or Recycler's suspension or revocation from the Scheme. Refer to section 2.8 for suspension/revocation process.

TSA operates two audit types:

1. Accreditation Audits – for applying tyre Collectors and Recyclers

   TSA requires that all Collectors and Recyclers seeking accreditation undergo an accreditation audit prior to accreditation being recommended to the TSA Board for approval.

2. Compliance Audits (annually) – to ensure that Collectors and Recyclers are compliant with their TSA commitments on an ongoing basis.

   TSA Audit and Compliance Program audits 100 percent of accredited Collectors and Recyclers annually. If a Collector or Recycler is deemed to be at a risk of not meeting the Scheme's requirements, TSA may schedule further risk-based audits for the specific site. The requirement for additional risk-based audits is at the discretion of TSA.

4 TSA Style Guide is available upon request from TSA, to accredited participants.

2.5 CONFIDENTIALITY AND PRIVACY

Confidentiality and privacy are paramount. All information and data about businesses and organisations accredited and/or associated with TSA are treated with the strictest confidence.

Section 5.2.2 of the Guidelines states that 'TSA will treat all information and documents obtained during an audit as confidential. Disclosure of sensitive audit findings and observations will be restricted to audit personnel and TSA senior management and will not be shared with other Participants or the public.'

Information about Applicants and Participants is handled by TSA. When handling information regarding Collectors and Recyclers, auditors whether contracted by TSA or internal are required to adhere to the highest standards of confidentiality and the protection of privacy. The Board is not advised of Collectors' and Recyclers' identities and audit timings during the Audit Programs. However, if required to make a decision regarding a Collectors or Recyclers Scheme accreditation status following a material or significant non-compliance with Scheme commitments, full disclosure of the identity of the non-complying business or organisation may be provided to the Board. It is not possible to conceal the fact that a Collector or Recycler is no longer part of the Scheme for either of the reasons discussed in Sections 2.8 or 2.9.

2.6 SUSTAINABLE OUTCOMES FOR EOLT

The Sustainable Outcomes Indicator (SOI) has been developed as a simple framework to represent the environmental and social impacts of EOLT that are collected, processed, used within Australia and exported internationally by Scheme Participants.

The intent of the SOI is to demonstrate how the activities of entities within the Scheme represent the achievement of environmentally sound uses for EOLT generated in Australia. The SOI has been developed to align with the objectives of the Scheme and principles of the waste hierarchy.

The SOI framework used to apply star ratings to Collector and Recyclers in the Scheme is available on the TSA website[5]. Collectors and Recyclers within the Scheme are assigned a star rating (0-5 stars), to represent Acceptable Outcomes and Unacceptable Outcomes.

SOI star ratings published on the TSA website are reviewed on at least a quarterly basis.

2.7 EMPLOYEE ENTITLEMENTS DECLARATION

It is critical to the reputation of TSA, the Scheme and the companies in the EOLT supply chain, as well as the sustainability of the tyre industry, to ensure that workers' rights are respected. Scheme participants are required to ensure that employees are paid correctly and that they receive all of their entitlements under law. Participants are also expected to take steps to ensure non-employee workers receive their entitlements, even when they are hired by a sub-contractor.

TSA's Employee Entitlements Declaration asks participants to confirm that they comply with key laws and standards in this regard. Participants will be required to complete the Declaration annually, on a site by site basis. In addition to employee entitlements, TSA also encourages participants to address all worker rights, including in relation to health and safety, discrimination, freedom of association and collective bargaining, and freedom from forced and compulsory labour as well as child labour, and may include consideration of respect for those rights in its audits.

5 Sustainable Outcomes Indicator: https://www.tyrestewardship.org.au/guidelines/sustainable-outcomes-indicator/

2.8 NON-COMPLIANCE ENFORCEMENT – SUSPENSION OR REVOCATION OF SCHEME ACCREDITATION

Where a tyre Collector or Recycler has breached Scheme requirements TSA, may:

- suspend a Collector or Recycler's accreditation immediately by giving notice in writing; or;
- revoke a Collector or Recycler's accreditation by giving 30 business days' notice in writing.

Whilst a Collector or Recycler's accreditation is suspended, TSA reserves the right to revoke the accreditation of a Collector or Recycler if necessary.

Collectors or Recyclers will first be provided with a reasonable opportunity (i.e. 30 business days) to rectify the non-compliance.

Where a Collectors or Recyclers accreditation is suspended or revoked, Retailers will be provided with reasonable opportunity (4 weeks) to seek an alternative to continue meeting their Scheme commitments.

Where a Collectors or Recyclers accreditation is suspended, the Collector or Recycler does not need to re-apply again for accreditation. The Accreditation may be reinstated once TSA determines the compliance issue is resolved and TSA is satisfied there is evidence to support the reinstatement of the accreditation.

Where a Collector or Recycler accreditation is revoked, the business or organisation can re-apply for accreditation after 12 months have lapsed.

Suspension and/or revocation will be noted against the relevant business entity on the TSA website. As a consequence of leaving the Scheme, through either resignation or revocation the Collector or Recycler status, a business or organisation:

- loses the right to use the Scheme's logo
- loses the right to make claims about being a Participant to the Scheme, and
- loses its entry on the Scheme's website.

In some circumstances, TSA may elect to keep an entry on the Scheme's website, including a note that the business has been 'suspended', 'revoked' or is 'no longer TSA accredited'. This is at the discretion of TSA.

2.9 TSA PROCEDURE TO ADDRESS REGULATORY NON-COMPLIANCE (EFFECTIVE JAN 2018)

The TSA Regulatory Breach Procedure (see process diagram on next page) has been created to ensure clarity as to accreditation status during the breach notification and investigation process and to indicate clear timeframes for actions by both impacted Scheme Participants and TSA. It also provides reassurance to other Scheme Participants that any regulatory breaches, including environmental, occupational health and safety and employment laws are considered appropriately within the Scheme framework.

The key elements of the process are as follows:

1. All TSA accredited Collectors and Recyclers are required to advise TSA Accreditation and Compliance Manager (self-report) of any regulatory breach, violation or infringements **within one week** of receiving official advice from the relevant authorities.
2. The Collector or Recycler impacted must provide TSA with copies of relevant breach/infringement notifications, within **7 days** of receiving such notification.
3. TSA will require that the Collector or Recycler provide an action plan outlining how they intend to address the issues relating to the breach(s)/infringement.
4. The TSA Accreditation and Compliance Manager will evaluate each case – in collaboration with local authorities, if required – and provide a recommendation to the TSA Board for appropriate action.

Where a Participant fails to report a Regulatory Breach as required under the Regulatory Breach Procedure, TSA may suspend or revoke the Participant's accreditation for such period as determined by TSA.

If TSA becomes aware of a Regulatory Breach it may, but is not required to, inform the relevant Participant. TSA reserves the right to inform Participants of Regulatory Breaches via available communication channels in order to continually improve best management site practices. TSA may also seek to verify information provided regarding Regulatory Breaches with third parties, as required.

A Regulatory Breach or non-compliance with the Guidelines can result in the suspension or revocation of a Participant's accreditation under the Scheme. A breach may be determined at the discretion of the TSA Board, including whether an identified breach will result in a suspension and/or revocation. Refer to section 2.8.

TSA- Regulatory Breach Procedure

Effective Date: 1 JAN 2018

VIOLATION OCCURS	PARTICIPANT SELF REPORTS TO TSA	TSA ASSESSES VIOLATION	PARTICIPANT DOES NOT SELF REPORT VIOLATION TO TSA
1. TSA accredited Participant commits an EPA and/or regulatory violation/ breach / infringement and receives a notice/ order/ fine.	1. TSA Participant is required to self-report the EPA and/or regulatory violation/ infringement within one week of notice to TSA. 2. TSA Participant is required to provide copies of official documentation (notice/ fine/ etc) as evidence. 3. TSA Participant is required to provide an Action Plan outlining how they intend to resolve the regulatory issue.	1. TSA AC will evaluate each violation individually in collaboration with relevant regulatory authorities if required. 2. TSA AC will provide a recommendation to the TSA Board proposing recommended actions from the breach as required.	1. If a TSA accredited Participant receives a violation/ infringement/ notice/ order/ fine and does not inform TSA within the proposed one week, TSA will inform the Participant via registered post and email that TSA is aware of their breach/ infringement/ notice/ order/ fine and request an explanation for the breach/ infringement/ notice/ order/ fine and proposed action plan. 2. Subject to item 4 below, if after one week, TSA does not receive satisfactory documentation, including plans to resolve the issue, TSA will write a letter to the Participant informing them that they are breaching TSA criteria and relevant jurisdictional authorities' regulations and therefore TSA has the right to revoke the Participants accreditation if further action is not provided. 3. Subject to item 4 below Participants will be provided a further week and if action does not occur to inform TSA and rectify the breach then TSA may consider revocation of the accredited Participant. 4. TSA, acting reasonably, may revoke Participant status, giving 30 calendar days' notice where a Participant has materially breached the requirements of the Guidelines[1].

[1] Guidelines for the Tyre Product Stewardship Scheme Tyre Stewardship Australia available at https://www.tyrestewardship.org.au/wp-content/uploads/2020/04/Guidelines-for-Tyre-Product-Scheme.pdf

DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES

3

INTRODUCTION
ACCREDITATION AND COMPLIANCE PROCESSES
DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES
SCOPE OF ACCREDITATION/ COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS
REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

3.1 ACCREDITATION AUDITS

1. Application form, Action Plan[6] and required information received and approved by TSA.
2. TSA Auditor contacts sites to initiate audit process, including an explanation of the audit, how long it will take, what information will be required, who will need to be in attendance and arrange a time for the site audit.
3. Site audit is undertaken.
4. TSA Auditor follows up with site within one day requesting any additional information and allowing one week for this information to be provided.
5. TSA Auditor prepares draft audit report (within two working weeks of audit) and detailed non-compliances and actions required by the site and provided timelines for compliance based on the risk matrix.
6. TSA Accreditation and Compliance Manager reviews and approves draft audit report.
7. TSA Auditor amends final draft audit report (if required) and sends to Auditee for review – one week to comment. If required, TSA will follow up with audit participant to clarify findings.
8. TSA Auditor reviews Auditee comments and finalises report for distribution to Auditee.
9. The actions listed in the Audit Report forms the Collector/Recycler's current TSA Action Plan. The site should implement the actions listed over the next 12 months and keep record of the document for future auditing purposes.
10. Based on the recommendations of the audit, the Auditee's application for TSA accreditation is recommended for approval by the TSA Board.
11. Once approved, the applicant becomes TSA accredited and receives a TSA accreditation pack, including TSA sticker and certificate of accreditation. Details of new accreditations are updated in TSA system.

6 Note: the intention of submission of an Action Plan at the application process is to show that the business or organisation intends to meet Scheme requirements by indicating actions to promote the Scheme/meet Scheme commitments applicable to their operation/s.

This is separate to a audit Action Plan, which is provided as part of a TSA audit and agreed with the Participant to implement actions over a given timeframe.

3.2 ANNUAL COMPLIANCE AUDITS

1. TSA Auditor develops schedule of annual compliance audits for Collectors and Recyclers.
2. TSA Auditor contacts sites **at least two weeks** prior to approximate audit date and provides an explanation of the audit, how long it will take, what information will be required, who will need to be in attendance and arrange a time with each site for the site audit
3. Site audit is undertaken.
4. TSA Auditor follows up with accredited entity within one day requesting any additional information and allowing one working week for this information to be provided.
5. TSA Auditor prepares draft audit report (within two working weeks of audit) and detailed non-compliances and actions required by the accredited entity and provided timelines for compliance based on the risk matrix.
6. TSA Accreditation and Compliance Manager reviews and approves draft audit report.
7. TSA Auditor amends final draft audit report (if required) and sends to Auditee for review – one week to comment. If required, TSA will follow up with audit participant to clarify findings.
8. TSA Auditor reviews Auditee comments and finalises report for distribution to Auditee.
9. The actions listed in the Audit Report forms the Collector/Recycler's current TSA Action Plan. The site should implement the actions listed over the next 12 months and keep record of the document for future auditing purposes.

SCOPE OF ACCREDITATION/ COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS

4

INTRODUCTION
ACCREDITATION AND COMPLIANCE PROCESSES
DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES
SCOPE OF ACCREDITATION/ COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS
REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

4.1 SCOPE OF AUDITS

TSA review the scope of accreditation and compliance audits on a regular basis and will make changes as required, based on:

- Participant feedback
- Changing risk – profile of Participants; and
- Alignment with objectives of the Scheme.

The scope of TSA audits will primarily focus on Participant's commitments to support the Scheme, including reporting to TSA online reporting platform, downstream vendor management and environmentally sound use of EOLTs. Key requirements for Participants to hold relevant insurances, permits and licences will be assessed as part of TSA audits. This includes ensuring that licence conditions (e.g. tyre storage/processing conditions and air/land/water discharges), are met.

It is the responsibility of site operators to understand and comply with regulatory requirements that apply to their operations. Contact should be made directly with the relevant authority (State or Territory) to determine how requirements can be met.

Other key areas of focus are tyre storage and fire safety, including management of hazardous materials and emergency response. These items form requirements of best practice management as prescribed by TSA's Best Practice Guidelines on Tyre Storage and Fire and Emergency Preparedness. An audit may also look to verify information provided in an Employee Entitlements Declaration.

TSA is committed to working with accredited entities to ensure their staff, customers and the environment are safe. While it is not TSA's remit to undertake an audit of EHS aspects as part of the accreditation and compliance audit process (for Collectors and Recyclers), it is relevant to TSA's objectives to minimise EHS impacts of managing end-of-life tyres and to ensure that Participants comply with relevant regulations. As a result, key EHS aspects, tyre storage and fire safety, including management of hazardous materials and emergency response form part of TSA's audit scope.

A list of items included in TSA's audit scope (for Collectors and Recyclers) are provided for reference below. For further detail, refer to Self-Assessment Checklist for Collectors and Recyclers (**Appendix 4**).

TSA Audit Scope – key focus areas

- **TSA Scheme Guidelines and Commitments**
  - Objectives of the Scheme
  - Dealing Transparently and Ethically with Others
  - Scheme Promotion
  - Tyre Inventory System / Tyre Storage Management System
  - Fate of Tyres – Local / International – Evidence of Environmentally Sound End-Use Required

  Collectors

  - Environmentally Sound Use
  - Deal with TSA accredited Recyclers
  - Data Reporting (as directed by TSA)
  - Transparency of Fees Charged for Collecting
  - Records / Inventory Management
  - Action Plan – refer to **Attachment 3** for example of Action Plan template post accreditation / compliance audit

  Recyclers

  - Environmentally Sound Use
  - Data Reporting (monthly or as directed by TSA)
  - Action Plan – refer to **Attachment 3** for example of Action Plan template post accreditation / compliance audit
  - Records / Inventory Management
  - Downstream Vendor Management
- **General Regulatory requirements**
  - Management Systems (EHS), if relevant
  - Local Government Approvals (Do you have the correct ones?)
  - Environmental approvals to operate (Do you have the correct ones?)
  - Transport licence (Do you have the correct one?)
  - Insurances, Closure, Business Continuity
  - Security / site access
  - Regulator Involvement – have you received any notices / fines from a regulator. Refer to TSA Regulatory Breach Procedure (section 2.9).
  - General housekeeping
  - Stormwater/ Water Discharges

  - Air Emissions
  - Hazardous Materials and Bulk Chemical Storage
  - Waste Management
  - Emergency Prevention, Planning and Response
  - Fire Safety – as per TSA Best Practice Guidelines for Tyre Storage and Fire and Emergency Preparedness
  - EOL Tyre Storage (Outdoor and Indoor) – as per TSA Best Practice Guidelines for Tyre Storage and Fire and Emergency Preparedness. (Are you meeting your license requirements? If you do not have a license are you under the jurisdictional requirements?).
- State Based Environmental Legislation (Tyre Storage, Transport, Processing, Recycling) and State Based Fire Legislation – refer to TSA Best Practice Guidelines for Tyre Storage and Fire and Emergency Preparedness for Essential Requirements in each jurisdiction.
- Down Stream Vendor Management and Environmentally Sound End Use of Tyres and Tyre Products information and licences (relevant to end destinations).

4.2 FOREIGN END MARKET PROGRAM

The aim of the Foreign End Market (FEM) Program[7] is to verify offshore facilities receiving Australian sourced EOLT, providing increased transparency of environmentally sound end use of EOLT.

The FEM Program is linked to the SOI (refer Section 2.6). Participants sending EOLT material to overseas destinations are required to have these destinations verified, where participants that do not have their FEM verified present 'unacceptable outcomes' for exported Australian sourced EOLT (and tyre product).

Acknowledgement of participants who have had FEM verified will be via application of FEM verified logo to their business on the TSA website.

4.3 FEM PLATFORM

All participants that export EOLT (and tyre product) overseas must have these final destinations independently verified in order to ensure environmentally sound use of EOLT and must only export to facilities which are currently verified under the FEM Program or via a certified third party auditor (to meet TSA defined criteria).

TSA has an online platform to manage verification of FEM (FEM Platform). FEM will become verified by TSA through completion of key steps as follows: Education, Self-Assessment (including upload of requested documentation to the FEM Platform), Verification of information (by TSA and/or independent auditor) and Site inspection (via independent auditor), if required.

Self-assessment and audit protocol relevant to FEM, includes the following focus areas: Modern Slavery, Health and Safety, Environment and Distribution[8].

Participating FEM that are audited as part of the FEM Program (or via certified third party auditor) will receive recommendations to assist in continual improvement. All information held on the FEM Platform will be strictly confidential. Where TSA engage directly with FEM for the purpose of verification, these sites will be made available on the TSA website and visible to TSA accredited entities only (not public to any tyre recycler)

7 Foreign End Market Program: https://www.tyrestewardship.org.au/accreditation/foreign-end-market-verification/

8 This focus area relates to safe transport of material and that product delivered to site is not sent offsite for use that may cause environmental and social harm.

REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

5

INTRODUCTION
ACCREDITATION AND COMPLIANCE PROCESSES
DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES
SCOPE OF ACCREDITATION/ COMPLIANCE AUDITS FOR COLLECTORS AND RECYCLERS
REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

The following is a summary list of documents and information that may be requested by TSA Auditors when conducting a document audit to assess a Collector or Recycler's compliance with the Scheme. Refer to **Attachment 1** for further information regarding required documentation to assess a Collector/Recycler application for TSA accreditation.

The summary list includes, but is not limited to, the following:

- Throughput details, including export details (bill of ladings etc.)
- Tyre stockpile management practices/procedures, where applicable
- Evidence to guarantee an environmentally sound end use of product when transferred to Down Stream Vendors (Collectors/Recyclers/Shipping Agents/Brokers/Exporters)
- Relevant licenses to recycle tyres and/or transport tyres (such as EPA License/Works Approvals/authority to transport waste etc.)
- Local government planning approval/permits (e.g. Development Approval, Planning Permits)
- Any fines or notices or clean up orders relating to the site or any company directors or office holders. Any other legal or regulatory notices.
- Fire/Emergency management plans/assessment reports/inspection certificates
- Company insurance details, vehicle insurances and details, worker's compensation
- Waste transport certificates/EPA reporting requirements
- Tyre Derived Product storage procedures/guidelines, where applicable
- Types of products/resources dispatched from site
- EHS documentation/plans/assessments/audits
- Storage of chemicals
- Authorisations for international transfer of wastes (e.g. under Basel Convention, where relevant)
- Major equipment inventories (e.g. balers, shredder, granulator), specifications to Australian Standards, preventative maintenance, pre-operational checks
- Employee policies
- Payroll records (subject to privacy requirements.

Where necessary, TSA will liaise with relevant regulators (State and Territory) to verify that applicants are adhering to regulatory requirements applicable to their site operations. Assessment of outstanding regulatory notices/fines forms part of the process for verifying that applicants are meeting Scheme requirements.

ATTACHMENT 1
COMMITMENTS AND COMPLIANCE

Commitments to be addressed and examples of Evidence Assessed to determine Compliance during a Document Audit.

GENERAL REQUIREMENTS

REQUIREMENT	ASSESSMENT
Deal transparently and ethically with others involved in the tyre supply chain, including customers.	*Reference: Provision of evidence of downstream vendors (where required), promotional material of EOLT recovery – website, receipts given to customers showing fees.*
Promote the scheme to the community, businesses and organisations.	*Reference: Action plan, promotional material, newsletters, stationery, website, articles.*
Adhere to the conditions that apply to use of the Scheme's accreditation branding and logo.	*Reference: Logo and other branding where used on document/s.*
Comply with relevant laws and practices, including those that apply to the environment, occupational health and safety and employment.	*Reference: EHS policies and procedures, environmental policies and procedures, application, licences where necessary, employee policies, workers compensation insurance information, payroll records.*
Cooperate with surveys conducted by TSA.	*Reference: TSA records.*
Cooperate with audits conducted by TSA.	*Reference: timeliness of response to requests for documents from TSA, completion of TSA audits as required.*
Perform the activities set out in the accepted Action Plan.	*Reference: Action Plan.*
Provide annual self-certification.	*Reference: Annual self-certification submitted to TSA.*

COLLECTORS

REQUIREMENT	ASSESSMENT
Ensure all end-of-life tyres collected from retail and other outlets with a recycling gate fee are passed to domestic tyre recyclers accredited by TSA as participants in the scheme.	*Reference: Contracts with recyclers, TSA records, comparison of records with those of retailers and recyclers.*
Provide data to TSA on the number and fate of tyre EPU/tonnage processed and sold or otherwise provided for an environmentally sound use.	*Reference: Documentation of tyres received from Participants and their fate, receipts from buyers of tyre-derived products.* *Reporting to TSA Reporting Platform regularly.*
Deal transparently and ethically with retailers and other outlets, specifically in relation to the fees and charges associated with the disposal of end-of-life tyres.	*Reference: Receipts given to customers showing fees.*

RECYCLERS

REQUIREMENT	ASSESSMENT
Documentation that all end-of-life tyres received from Participants go to an environmentally sound use.	*Reference: Documentation of tyres received from Participants and their fate, receipts from buyers of tyre-derived products.*
Provide data to TSA on the number and fate of tyre EPU/tonnage processed and sold or otherwise provided for an environmentally sound use.	*Reference: Documentation of tyres received from Participants and their fate, receipts from buyers of tyre-derived products.* *Reporting to TSA Reporting Platform regularly (data provided to TSA).*

ATTACHMENT 2
TSA SCHEME RISK RATING METHODOLOGY

A summary of the audit finding types and a description of the non-compliances that lead to each audit finding type are presented in Table 1.

Table 1 Risk rating summary

FINDING TYPE	FINDING DESCRIPTION
Gross Non-Compliance Finding	Participant fails to respond to directive issued by TSA within 30 days in relation to a high risk finding.
High Risk Finding	**Regulatory Non-Compliance** Highest risk of enforcement (likely, or potentially high penalty), release, injury, or liability, or the absence or near-absence of a required program. **TSA Guideline Non-Compliance** • Refusal to cooperate with the Tyre Product Stewardship Scheme Audit; • Evidence establishes that Participants do not have arrangements in place to recycle all Scheme tyres; • Previous instances of medium level non-compliance have not been addressed; • Multiple previous instances of medium level non-compliances; • One prior instance of serious non-compliance.
Medium Risk Finding	**Regulatory Non-Compliance** Significant but not highest-risk finding. Failure to provide training as required by regulation. Failure to complete a periodic requirement on time. Substantial number of minor deficiencies in a compliance program. Non-repetitive failure to meet a licence requirement. **TSA Guideline Non-Compliance** • Lack of evidence that Participants have arrangements in place to recycle all Scheme tyres; • Verification process indicates that a Participant does not have arrangements in place to recycle all Scheme tyres; • Failure by Participants to provide data and failure or delay in contributing to verification process. • Not reporting regularly via the TSA Reporting Platform; • Unsecure outdoor storage of end-of-life tyres. Theft and/or dumping has been an issue; • Misuse of logo, e.g. in an inappropriate context such as on the side of skip used for general waste; • First incident for the above examples or similar; • Numerous instances of low-level non-compliance that, together, cannot be regarded as minimal.

FINDING TYPE	FINDING DESCRIPTION
Low Risk Finding	**Regulatory Non-Compliance** Compliance detail when basic program elements are in place. Single (non-repetitive pattern) minor deviation from a regulation. Inaccurate compliance determination. **TSA Guideline Non-Compliance** • Inadequate action to promote the Tyre Product Stewardship Scheme (e.g. Does not have a TSA sticker and/or TSA sticker is out-of-date, site does not have any promotional flyers on-hand); • End-of-life (EOL) tyre storage is outside and covered, but not secure (i.e. locked). Theft and/or dumping has not been an issue. • Lack of cooperation or delay by Participants in providing data or cooperating in place to recycle all Scheme tyres; • Intelligence received that a Participant does not have arrangements in place to recycle all Scheme tyres; • Minor misuse of the Tyre Product Stewardship logo (e.g. specification of logo not met); • First incident of its type for the particular Participant; • No more than two previous incidents of low-level non-compliance in other areas.
Best Management Practice	Auditor recommends a best management practice, representing industry best practice, typically relating to a risk-based findings.
Area of Potential Concern	An area/activity that may present a future non-compliance. This is based on the evidence collected during the current audit that may trigger a future compliance obligation.

Table 2 outlines the timeline TSA participants must adhere to in order to implement corrective action and close out findings from the audit program.

Table 2 Corrective action closure timelines

DEFINITION	CORRECTIVE ACTION REQUIRED BY
Gross Non-Compliance Issue	Should be resolved immediately
High Risk Finding	Resolved within one month
Medium Risk Finding	Resolved within 6 months
Low Risk Finding	Resolved within one year
Best Management Practice	As appropriate
Area of Potential Concern	As appropriate

ATTACHMENT 3
ACTION PLAN TEMPLATE

The Action Plan template below forms part of the audit summary which will be compiled by the TSA Auditor at the time of the audit and forms the Participant's TSA Action Plan for review and actioning of non-compliant issues (over 12 months).

COMPLIANCE ACTION PLAN			
CATEGORY	FINDINGS	ACTION REQUIRED	TIMELINE
Gross Non-Compliance			
High Risk Finding			
Medium Risk Finding			
Low Risk Finding			
Best Management Practice			
Area of Potential Concern			

ATTACHMENT 4
SELF-AUDIT CHECKLIST FOR COLLECTORS AND RECYCLERS

The following self-assessment checklist for Collectors and Recyclers[9] provides Participants with a list of key requirements that may be requested during a TSA Audit to support Participant compliance with the Scheme requirements.

This checklist is intended as a guide to support Participants through the TSA audit process. It may be a useful tool for Participants to review prior to a scheduled TSA audit.

The scope of TSA audits will primarily focus on Participant's commitments to support the Scheme, including reporting to TSA online reporting platform, downstream vendor management and environmentally sound use of EOLTs. Key requirements for Participants to hold relevant insurances, permits and licences will be assessed as part of TSA audits. This includes ensuring that environmental licence conditions (e.g. tyre storage/processing conditions and air/land/water discharges), where relevant are met. An audit may also look to verify information provided in an Employee Entitlements Declaration.

TSA is committed to working with accredited entities to ensure their staff, customers and the environment are safe. While it is not TSA's remit to undertake an audit of EHS aspects as part of the accreditation and compliance audit process (for Collectors and Recyclers), it is relevant to TSA's objectives to minimise EHS impacts of managing end-of-life tyres and to ensure that Participants comply with relevant regulations. As a result, key EHS aspects, tyre storage and fire safety, including management of hazardous materials and emergency response form part of TSA's audit scope.

Documentation will be requested ahead of scheduled TSA audit. Where documentation is unavailable, observations will be made on site and recommendations made as part of TSA audit findings.

9 Note that as part of continuous improvement of the Scheme audit questions may change from time to time, i.e. self-assessment checklist is provided as a guide only.

TSA GUIDELINE REQUIREMENTS

1.0 GENERAL REQUIREMENTS – ALL PARTICIPANTS IN THE SCHEME:

☐ Does the Participant support the objectives of the Scheme?

- ☐ TSA Action Plan
- ☐ Evidence of progress against targets
- ☐ Staff interview confirms understanding and support the Scheme
- ☐ Staff interview confirms they are aware of the Action Plan and relevant actions and targets
- ☐ Other

☐ Does the Participant deal transparently and ethically with others involved in the tyre supply chain?

- ☐ Evidence of tyres sent to environmentally sound use
- ☐ Staff interview confirms ethical actions in support of the Scheme

☐ Does the Participant promote the Scheme to the community, other businesses and organisations, including through the development and implementation of an individual Action Plan?

- ☐ Evidence of promotion of Scheme
- ☐ Evidence of point of sale material on display
- ☐ Evidence of TSA logo/sticker displayed
- ☐ Action Plan in place and implemented
- ☐ Staff interview indicates promotion of the Scheme
- ☐ Other

☐ Does the Participant use the scheme's branding and logo and adhere to the conditions that apply to that use, as set out in Part B of the Tyre Product Stewardship Scheme Guidelines (the Scheme)?

- ☐ Logo is visibly displayed at the site
- ☐ TSA logo on building and collection vehicles
- ☐ Logo is used on documents and publications
- ☐ Use of logo is appropriate

- ☐ Does the site have an inventory system to monitor the number of tyres stored onsite including number in each pile, the storage location, and distances between piles, group, boundaries and buildings?
  - ☐ Inventory system for IN and OUT
  - ☐ Inventory system for tyre placement

- ☐ How many tyres did you collect last FY?
  - ☐ Weighbridge dockets
  - ☐ Proof of number IN
  - ☐ Number comparable to annual reports

- ☐ If applicable, how many tyres left the site to third party for end-use?
  - ☐ Proof of number OUT
  - ☐ Number comparable to annual reports

- ☐ Has the accredited Participant provided data to TSA on the number and fate of tyre EPU processed and sold or otherwise provided for an environmentally sound use?
  - ☐ Monthly data in TSA system
  - ☐ Infrequent reporting
  - ☐ Not reporting (not yet accredited)

- ☐ Does the site have a record keeping system to manage the records for the licences and permits of management partners/suppliers and transporters? Do they keep records such as invoices, consignment notes to track the movement of waste?
  - ☐ Records kept and available

- ☐ Does the site ship waste tyres overseas?
  - ☐ Yes – see section 4
  - ☐ N/A

- ☐ Can the site provide evidence that tyres go to an environmentally sound use in the overseas country?
  - ☐ Downstream vendor audits provide evidence of environmentally sound use – see Downstream Vendor (export) checklist, section 4

☐ Can the site verify the country where they are shipping the waste will accept waste tyres?

- ☐ Evidence of verification
- ☐ Destination country has not banned import of waste tyres

☐ For all material transported to downstream vendors, the facility maintains documentation confirming receipt of materials by vendors.

- ☐ Yes – see Downstream Vendor (export) checklist, section 4
- ☐ N/A

General Requirements – notes/other evidence available for TSA audit:

2.0 COLLECTORS

☐ Does the Participant collect and/or transport tyres?

- ☐ Transport licences

☐ Does the Participant deal only with recyclers accredited by TSA (ensure that contractual arrangements specify that all end-of-life tyres are provided to an accredited tyre recycler)?

- ☐ All copies of dockets/receipts provided for review
- ☐ Dockets show tyres only sent to Scheme Participants
- ☐ Contracts with non-accredited collectors specify tyres go to ESU
- ☐ Other

☐ Does the Participant deal ethically and transparently with retailers and other outlets, specifically in relation to the fees and charges associated with disposal of end-of-life tyres? How much is charged, and is it adequately explained?

- ☐ Invoices show charge
- ☐ Invoices explain charge included
- ☐ Advice provided explaining charge on invoice
- ☐ Other

☐ Where a Collector is also a Recycler, does the Participant guarantee that all end-of-life tyres received from Participants go to an environmentally sound use?

- ☐ Evidence tyres sent to environmentally sound use
- ☐ Invoices
- ☐ Consignment notes
- ☐ Relevant clauses from contracts
- ☐ Other

Collectors – notes/other evidence available for TSA audit:

3.0 RECYCLERS

☐ How much was reported as recycled/ recovered last reporting period?

- ☐ Quantity available

  Amount _____

☐ Can the Participant substantiate the quantity reported as recycled/recovered?

- ☐ Reported quantity (above) can be verified by substantiation
- ☐ Bills of ladings
- ☐ Invoices
- ☐ Other

☐ What is the processing capacity of the site?

- ☐ Quantity available

  Amount _____

☐ How does the site ensure all tyres received go to environmentally sound use? Is there a contingency plan in place?

- ☐ Business Plan
- ☐ Contingency Plan
- ☐ Other

☐ Does the Participant comply with TSA reporting requirements?

- ☐ Monthly data in TSA system

☐ Does the business also collect tyres? If so, ensure all applicable requirements are also met

- ☐ Yes – complete Collector checklist, section 2
- ☐ N/A

Recyclers – notes/other evidence available for TSA audit:

4.0 DOWNSTREAM VENDOR CHECKLIST

- ☐ Does the collector or recycler export tyres or tyre derived products to international destinations? Note destinations.
  - ☐ List of destinations

- ☐ Does the collector or recycler have contracts in place that specifies the form of the exported waste tyres? Shredded, baled or whole tyres?
  - ☐ Contractual arrangements specify the form of the waste

- ☐ Does the collector or recycler use brokers, agents (primary or secondary) or freight forwarders?
  - ☐ Details of brokers, agents (primary or secondary) or freight forwarders

- ☐ Are there any specific controls in place for the export of tyres and tyre products to the destination country?
  - ☐ Yes – see 'If YES' below
  - ☐ No – see 'If NO' below

  - ☐ If YES – is there evidence from a relevant regulatory authority that the import of tyres, in their exported form, is acceptable?
    - ☐ Evidence from the relevant regulatory authorities from the receiving party if the controls are not clear

  - ☐ If NO – if control measures are in place is written notification and consent must be obtained from the relevant regulatory authority from the receiving party.
    - ☐ Written notification and consent must be obtained from the relevant regulatory authority from the receiving party

- ☐ Are the whole tyres (or modified whole tyres), baled tyres or tyre derived products exported, free of contamination (such as dirt, rocks or water) and appropriately fumigated according to contractual arrangements (if required)?
  - ☐ Evidence (photos are appropriate) that the tyres are free of contamination

- ☐ Are export declarations including Export Declaration Number (EDN) for each shipment and monthly reports from the Integrated Cargo System (ICS) obtained?
  - ☐ Export declarations, including Export Declaration Number (EDN) for each shipment and monthly reports from the Integrated Cargo System (ICS) for exports

- ☐ Are bills of lading available to be viewed including loading/receival dates and transport consignment numbers?
  - ☐ Evidence of bills of ladings for all exports that include loading/receival dates and transport consignment numbers

- ☐ Can these be reconciled against monthly sales/purchase orders and receipts and shipping consignments?
  - ☐ Yes – reported quantity can be verified
  - ☐ No

- ☐ Is the production/processing capacity of the facility detailed and can these amounts be reconciled against volumes of material exported?
  - ☐ Yes – reported quantity can be verified
  - ☐ No

- ☐ Is the recycler able to provide evidence of destruction to demonstrate that the tyres or tyre derived products have been processed and can no longer be re-used.? The form of destruction (i.e. energy recovery, energy generation, pyrolysis etc.)?
  - ☐ Yes – appropriate evidence available
  - ☐ No

- ☐ Are there any photo's available to view that show the facility?
  - ☐ Yes – appropriate evidence available
  - ☐ No

- ☐ Does the receiving facility have in place environmental licences, transport licences, licences to operate, emission and monitoring results, annual regulatory reporting and environmental statements?
  - ☐ Yes – appropriate evidence available
  - ☐ No

- ☐ Does the receiving facility safeguard the occupational health and safety of site personnel and adhere to any regulatory requirements around minimum or best practice human health protection standards?
  - ☐ Yes – appropriate evidence available
  - ☐ No

☐ Does the facility have industry or association accreditations?

- ☐ Yes – appropriate evidence available
- ☐ No

Downstream Vendor (export) – notes / other evidence available for TSA audit:

GENERAL REGULATORY REQUIREMENTS

It is the responsibility of the site operator to ensure compliance with relevant EHS regulations specific to your State or Territory.

5.0 GENERAL ENVIRONMENT, HEALTH AND SAFETY

5.1 INSURANCE, CLOSURE, BUSINESS CONTINUITY

☐ Does site hold appropriate insurances based on the business type and operations?

- ☐ Public and Product Liability
- ☐ Workers compensation
- ☐ Pollution liability
- ☐ Third party compulsory insurance for Motor Vehicles
- ☐ Pollution insurance (also called environmental risk insurance)
- ☐ Other

5.2 SITE APPROVALS

☐ Does the site hold appropriate permit (Local Council) to operate (based on the business type and operations)?

- ☐ Yes, permit approved
- ☐ Permit application in progress
- ☐ No
- ☐ Other

☐ Has the site completed a self-assessment, where applicable (Development Approval)?

- ☐ Yes
- ☐ No
- ☐ In progress

5.3 SECURITY

☐ The site has appropriate security measures to prevent unauthorised entry, which are secure and well maintained

- ☐ Security fencing
- ☐ Secure lockable gates
- ☐ CCTV cameras
- ☐ Motion detectors, sensor lighting
- ☐ Alarm system
- ☐ Other

5.4 MANAGEMENT SYSTEMS

☐ The site has a management system containing procedures describing business processes

- ☐ Non-certified management systems
- ☐ ISO 9001
- ☐ ISO 14001
- ☐ OHSAS 18001
- ☐ AS 4801
- ☐ Other

☐ Has the site identified and assessed the EHS risks associated with the activities being carried out on site?

- ☐ Job Safety Analyses (JSAs)
- ☐ Safe Work Method Statements (SWMS)
- ☐ Risk Assessments
- ☐ Other

☐ Are facility EHS audits performed?

- ☐ Audit documents
- ☐ Audit schedule
- ☐ Audited for certification

☐ Are operational and management procedures documented, available and implemented?

- ☐ Documented operating & management procedures
- ☐ Safe Operating Procedures (SOPs)
- ☐ Evidence of staff training/implementation

5.5 REGULATOR INVOLVEMENT

☐ The site has had environmental incidents such as spills or fires that caused environmental impacts (i.e. required reporting)

- ☐ Incident reports
- ☐ Clean up notice
- ☐ Correspondence with EPA
- ☐ EPA records
- ☐ Other

☐ The site has had serious or dangerous health and safety incidents?

- ☐ WorkCover notices
- ☐ Correspondence with regulator
- ☐ Other

☐ The site has successfully managed legal requirements and avoided notices, fines or penalties?

- ☐ WorkCover notices
- ☐ Correspondence with regulators
- ☐ Clean up notice
- ☐ Other

☐ The site has received complaints from neighbours or interest groups?

- ☐ Complaint correspondence
- ☐ Complaints log, e.g. as per licence conditions
- ☐ Procedure for addressing complaints
- ☐ Evidence of action taken to address complaints
- ☐ Other

5.6 ENVIRONMENT – GENERAL HOUSEKEEPING

☐ Housekeeping across the site considered to be:

- ☐ Poor
- ☐ Acceptable
- ☐ Good
- ☐ Excellent

5.7 ENVIRONMENT – LICENCE CONDITIONS

☐ Does the site have relevant EPA licences to operate that covers business type/operations?

- ☐ Yes – evidence/copy of current licence kept on site
- ☐ No
- ☐ In progress

☐ Can the site provide evidence that all licence conditions are being met?

- ☐ Tyre storage threshold maintained
- ☐ Stormwater
- ☐ Air emissions
- ☐ Water discharges
- ☐ Waste management
- ☐ Chemical storage
- ☐ Complaints log
- ☐ Waste reporting
- ☐ Other condition

5.8 OHS – EMERGENCY PREVENTION, PLANNING, AND RESPONSE

☐ Does the site have an emergency plan and is it regularly reviewed?

- ☐ Site emergency plan
- ☐ Next review date indicated
- ☐ Plan is up to date

☐ Does the site carry out regular emergency scenario training such as evacuation drills, fire-fighting drills, spill response?

- ☐ Documented schedule for drills
- ☐ Staff interview confirms

☐ Are the emergency plans regularly reviewed?

- ☐ Site emergency plan
- ☐ Next review date indicated
- ☐ Plan is up to date

General Environment, Health and Safety – notes/other evidence available for TSA audit:

5.9 FIRE SAFETY

Please refer to Tyre Stewardship Australia Best Practice Guidelines on Tyre Storage and Fire and Emergency Preparedness. The guidelines present the Essential Requirements which have been deemed to comply with regulations across each Australian jurisdiction.

☐ Are there sources of ignition in close proximity to flammable/combustible materials?

- ☐ Hot works permit system
- ☐ Inspection of electrical equip/machinery and vehicles
- ☐ No storage of flammable/hazardous wastes within 30 m of tyre storage
- ☐ No open fires
- ☐ No smoking zones
- ☐ Ignition control not adequate

☐ Has the facility completed a fire safety study?

- ☐ Yes
- ☐ No
- ☐ In progress

☐ Has the site engaged with the local fire authority?

- ☐ Correspondence with fire authority

☐ Is there provision for first response fire protection? Is the equipment appropriately maintained?

- ☐ Fire extinguishers meet standards
- ☐ Hose reels meet standards
- ☐ Exit signs and lighting
- ☐ Equipment inadequate

☐ Does the site have smoke and/or heat detectors or an early warning system?

- ☐ Smoke and heat detectors
- ☐ Automated emergency services alert
- ☐ Inadequate fire detection

☐ Is there a compliant fire hydrant and onsite water storage being appropriately maintained?

- ☐ Adequate number of hydrants
- ☐ Adequate onsite water storage
- ☐ Fire hydrants meet standards
- ☐ Fire water supply is inadequate

☐ If the site **does have** a sprinkler system, does the fire water containment capacity meet State Fire Authorities Guideline requirements?

- ☐ Yes
- ☐ No

☐ If the site **does not** have a sprinkler system, does the fire water containment capacity meet State Fire Authorities Guideline requirements?

- ☐ Yes
- ☐ No

6.0 SITE CONTAINMENT OF CONTAMINATED WATER

☐ If the site has a hydrant or sprinkler system, does the site have provisions for the retention of contaminated water run off? (i.e. fire water?)

- ☐ bunding or containment area around tyre storage
- ☐ onsite retention for contaminated fire water
- ☐ no bund walls or containment area

6.1 EMPLOYEE ENTITLEMENTS

☐ Does the site have a system in place to ensure compliance with minimum employee entitlements? Does the site keep appropriate payroll records?

☐ HR/payroll systems

☐ Employee/payroll records kept