

## **ELV RECYCLERS**

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Mr. Phillip Weickhardt  
Presiding Commissioner  
Waste Generation and Resource Efficiency Inquiry  
Productivity Commission  
LB2 Collins Street East  
MELBOURNE VIC 8003

Dear Commissioner,

I wish to advise that the VACC, in its haste to meet your deadline compiled an overload of data on the global Auto recycling industry and submitted it to you. During its compilation they neither offered auto parts recyclers or stakeholders the opportunity to comment on or even read its contents.

It is certainly not representative of our industries stakeholders views and the directions suggested within the submission is false and misleading.

Therefore, on behalf of my Company, one of Melbourne's largest ELV Recyclers that employs over 50 staff and is a bona fide operator and longstanding member of the VACC I hereby request that you disregard or carefully consider the content of the VACC submission dated February 2006 and lodged under the names of Alan Marshall and David Russell. It contains a mass of information overload with few affordable solutions. In fact it shows all the signs of being "underprepared."

It's only recently that the VACC formed an Automotive Recycling Division. Its staff whilst enthusiastic and willing to take on new ideas does not yet have an established depth of recycling industry knowledge. Nor the application and practical experience in implementing change within it. Stakeholders have all the necessary skills and experience in abundance and it's to them the VACC should be turning to for advice prior to lodging their submissions. Put simply, VACC staff cannot expect to gain "the knowledge" by reading 'snippets' of international information.

An experienced and active committee already exists consisting of four high volume ELV stakeholders. One of its members, Mr. Mike Third who has strong ELV interests, undertook a study tour mid last year to attend the Geneva Automotive Recycling Conference and toured a number of advanced facilities whilst there. It is therefore simply unbelievably disappointing that the VACC did not consult this committee for comment prior to its submission.

Throughout Australia the Recycling/Wrecking Industry breaks down into essentially 3 categories:

- 1) Traditional High, Good Quality Auto Recyclers/Wreckers. There are many. Processing 500 to 1000 cars per annum.  
*(Income derived from recycled parts sales. Little interest in scrap and*

- old cars*).
- 2) High volume, bona fide (ELV) vehicle processors. Less than 10 in Melbourne. Processing ELV in thousands per annum (*Income derived from scrap and ELV sale of recycled parts*).
  - 3) Traditional, usually small, auto recyclers/wrecking yards. Often unlicensed. Some poor practices. Authorities currently exist but do not enforce laws.

My company has 2 sites. One as per item 1 and one as per item 2 above.

As your programme moves forward. I would be delighted to assemble 10 owner principles from within our industry and provide a guided tour of each of their yards for you and/or your staff members. Visiting and knowing the existing industry would be a great start. In years gone by, my own company has hosted the Nissan Company from Japan and given tours to local councils of our facility.

The auto parts recycling industry itself has undergone massive changes, for the better, over the last 15 years and particularly in the last 5 years. More change is inevitable. However, it is imperative that consideration is given to the 'affordability' by the industry of any future changes and that any new laws are "workable".

I have today received a copy of the MTAA submission dated 8 February and signed off by Mr. Michael Delaney. This appears better constructed with consideration of the existing industry. At first glance I have noted that he has included the European directive for consideration. The conditions in our massive Australian continent with only a population 20 million people is totally different to those experienced in Europe. Learned persons within the industry generally regards the 'European Model' as "NOT THE AUSTRALIAN MODEL". When I last spoke with Mr. Mike Third on this subject his evaluated response was "there is no one single successful system in Europe at the moment. We will learn by watching what unfolds and do it correctly."

Could I, as an individual operator have made a submission to your programme? If it was possible and I am within the closing date, please accept my comments as laid out above as a small contribution.

Finally, I am aware that some concerned autoparts recyclers are already lobbying the VACC to withdraw their submission.

Yours faithfully,

Wayne Imlach  
Director

10<sup>th</sup> February 2006