



Ministry for the
Environment

Manatū Mō Te Taiao

A PROPOSED NATIONAL ENVIRONMENTAL
STANDARD FOR THE

Outdoor Storage of Tyres

CONSULTATION DOCUMENT

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Ministry for the
Environment
Manatū Mō Te Taiao



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Message from the Minister

This proposed new regulation to control storage of waste tyres is part of a broader package of measures to address this environmental problem.

New Zealand produces approximately 5 million waste, or end of life, tyres each year. The majority of these end up in uncontrolled stockpiles, landfills or are illegally disposed of. These tyres produce leachate contaminants like heavy metals, pose a fire risk, and can support significant rodent or mosquito populations as well as damaging the aesthetics of communities.



There are currently no national regulations to manage the outdoor storage of tyres. We are repeatedly seeing cases around New Zealand of abandoned tyre stockpiles having to be disposed of by councils at public expense. It would be possible for each of our councils to put rules into their district plans to control such activities, but a more efficient approach is national regulation. This is consistent with the Government's direction on a range of environmental issues like telecommunications, aquaculture, forestry, pest control, and stock exclusion from waterways.

This straightforward regulation simply requires a council consent for significant outdoor stockpiles of tyres. This gives the council the opportunity to put in place site appropriate conditions to manage the environmental issues, and to require a bond to protect ratepayers from a potential future liability.

The intention behind this proposed regulation is to also drive the tyre industry towards more sustainable recycling and disposal options. As part of this package, funding from the Government's Waste Minimisation Fund (WMF) is being provided towards a significant investment in infrastructure with the waste industry to collect and shred end-of-life tyres. A funding arrangement has also been entered into with Golden Bay Cement to install machinery to enable millions of tyres per year to be used in the manufacture of cement. WMF funding is also being provided to other potential end-of-life tyre uses such as in road and cycleway surfacing, floor underlay, fuel and construction products.

We welcome feedback on this proposed National Environmental Standard through this consultation document. Our objective is to reduce the risk of environmental harm from the stockpiling of waste tyres and to support the development of more environmentally sound recycling and disposal options.

Hon Dr Nick Smith
Minister for the Environment

Section 1: Background

About this consultation

The Government is considering developing a national environmental standard (NES) under the Resource Management Act 1991 (RMA) to control the activity of outdoor tyre storage.

Anecdotal evidence suggests outdoor tyre storage is a common activity in New Zealand. However, there are risks if tyres are not stored in an appropriate way.

Currently, there are no national regulations that relate specifically to the storage of tyres. The rules for storing tyres are determined by regional and district councils under the framework of the RMA and bylaw powers under the Local Government Act 2002. The Government is considering how best to manage the risks of harm to the environment, human health, and local communities from storing tyres and is seeking feedback on the proposal to develop an NES under the RMA for this purpose.

We are seeking information from local government, businesses and the public on the proposal to develop an NES, so we can better understand the costs and benefits of the proposed intervention.

This consultation only seeks information on the proposal to develop an NES. It does not seek information on how best to increase tyre recycling in New Zealand. In October 2015, the Government targeted the Waste Minimisation Fund towards growing markets for recycled tyre products. This Government initiative is directed at increasing New Zealand's rate of end-of-life tyre recycling.

Submissions close at 5.00 pm on Friday 4 August 2017. Information on how to make a submission, including questions to guide your feedback, is included in [section 5](#).

Previous government action on tyres

For decades New Zealand has faced problems with the recycling and storage of used tyres. In recent years the Government has considered how best to address both of these issues.

In May 2014, the Government released a discussion document to consult on four waste streams for potential government intervention, including tyres. It asked whether these are the right waste streams for potential government intervention and whether any of these products should be declared priority products requiring a product stewardship scheme to be developed and accredited under the Waste Minimisation Act 2008.

For all waste streams identified, including tyres, the majority of submitters were supportive of these products being the focus of potential government intervention. Many submitters wanted regulations to be developed to create a 'level playing field' for managing these product waste streams, but also wanted to make sure any mandatory product stewardship schemes are well designed.

Following the Government's consultation it was determined that before introducing regulation more analysis was needed to understand the barriers to end-of-life tyre recycling in New Zealand. The Ministry for the Environment commissioned KPMG to undertake an investigation into on-shore waste tyre recycling. KPMG's report determined that a principle barrier to the recovery of end-of-life tyres for recycling in New Zealand is the limited markets for recycled tyre products.

In light of the KPMG report, the Government in October 2015 targeted the Waste Minimisation Fund towards growing markets for recycled tyre products. This Government initiative is directed at increasing New Zealand's rate of end-of-life tyre recycling. Successful projects from this funding round will begin over the course of 2017 and 2018. Growing markets for recycled tyre products addresses the economics of used tyre recycling; however, the initiative does not address the risk associated with storing tyres outdoors.

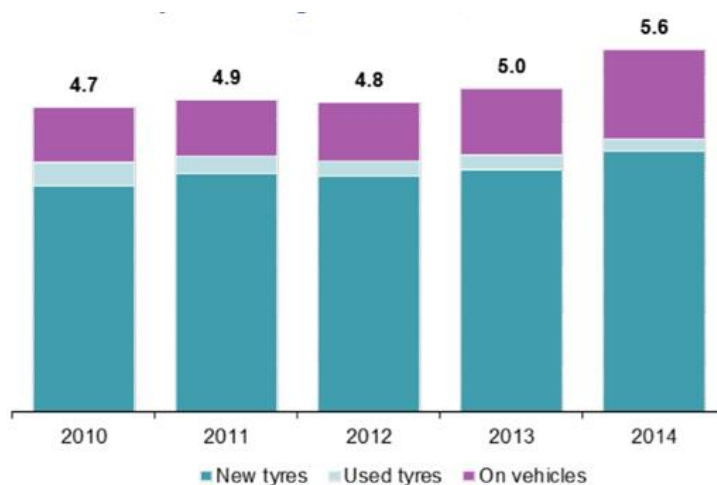
Section 2: The problem with storing tyres

What are end-of-life tyres?

End-of-life tyres (ELTs) are used tyres that are not or cannot be reused for their originally intended purpose and are not re-treaded. The term tyres in this document refers to all pneumatic (air filled) tyres for cars, motorcycles, trucks, buses, off-road vehicles, aircraft, and certain solid tyres (forklifts), but not bicycle tyres.

Approximately four million car and one million truck and other ELTs are generated annually in New Zealand. Due to increased vehicle kilometres the supply of ELTs in New Zealand is increasing. For example, between 2010 and 2014 the total number of tyres entering New Zealand increased by 22 per cent (KPMG, 2015).

Figure 1: Number of tyres entering New Zealand, in millions



Source: KPMG Waste Tyres Economic Research: Report 3 (2015) p14.

Research suggests an estimated 30 per cent of ELTs are being exported, used for agricultural purposes, or recycled, with the remaining 70 per cent being disposed of to landfill, stored on land, or otherwise unaccounted for (KPMG, 2015).

The risks with storing tyres

Storing tyres outdoors poses a risk of harm to the environment, human health, and local communities. For example:

- Fires – tyre piles represent a risk of significant adverse effects from fire. Tyres do not spontaneously combust but can be ignited accidentally or deliberately and can be difficult to extinguish (depending on the size, location and formation of the pile). Tyre fire smoke and run-off contains a range of toxic and carcinogenic compounds, including dioxins, furans, mercury and lead, which can require evacuation of nearby downwind residential areas and contaminate soil and water supplies (Firecone, 2004).
- Pests – large tyre piles can become a human health risk by creating breeding grounds for mosquito and rodent species that may spread diseases. New Zealand currently has few mosquitoes capable of carrying serious diseases, and those that exist do not appear to breed in tyres (Firecone, 2004). However, alien mosquito species capable of carrying serious diseases (such as dengue fever) that are known to breed in tyres are relatively

frequently discovered near ports and at the border (Ministry for the Environment, 2014 and Firecone, 2004). These risks are likely to increase as the effects of climate change become more prevalent.

- Discharge of contaminants – inappropriate storage of tyres can result in leaching of toxic materials into soil and occasionally groundwater. The concentration of leaching is specific to storage time and local conditions. The longer a tyre pile is exposed, the more contaminants will be released, particularly in damp conditions. Contaminants that can leach from tyres include cadmium, lead, aluminium, manganese and zinc (Kim, 2004). Laboratory tests suggest that leachate from tyres may be toxic to some fish species (such as rainbow trout), invertebrates and algae (MWH, 2004).
- Financial liability – illegal dumping and abandonment of tyre stockpiles can create a large financial liability for removing the tyres or cleaning up the site. Removal of illegally dumped tyres has cost councils and landowners from \$8,000 to \$100,000, depending on the amount of tyres and location (Firecone, 2004).
- Visual and amenity impacts – large piles of tyres are unsightly for neighbours and communities in general and can impact on the pleasantness and aesthetic coherence of an area. Large tyre piles can also have negative impacts on New Zealand’s clean green image. Tyre piles can also increase vermin (as noted below) which can have an adverse effect on the amenity of an area.

The storage of tyres in New Zealand

New tyres / useable tyres

New / useable tyres are a valuable commodity that can retail for between \$50 and \$400 each. Because these tyres are valuable there are more incentives for the owner of the tyres to store them in a protected way. For example, new and useable tyres are likely to be stored in a secure environment such as a warehouse, distribution centre, or retail facility that is not easily accessible by the general public. Storing the tyres in this way minimises the risk of harm occurring by reducing amenity effects and the risks of fire or contaminant leaching.

Outdoor tyre storage

Anecdotal evidence suggests that in New Zealand it is common to stockpile used and end-of-life tyres with the intent of future reuse or reprocessing. The most typical form of temporary storage for large volumes of end-of-life tyres is in outdoor tyre stockpiles that are normally uncovered. These stores typically have limited security measures and can be more easily accessed by the general public than new tyre warehouses.

Anecdotal evidence suggests individuals and small businesses are the most likely to become involved in the activity of stockpiling end-of-life tyres. End-of-life tyres are often stockpiled because:

- stockpiling provides a cheap method of disposal and an opportunity to reduce business costs
- individuals hope the economic value of end-of-life tyres will increase in the future, and thereby store tyres in anticipation of this (waste banking)
- individuals store end-of-life tyres to use as a feedstock supply for future tyre recycling technologies (as mentioned previously tyre recycling in New Zealand faces economic barriers).

Outdoor tyre stockpiling is an issue if storage practices are insufficient to mitigate the risk of adverse effects. As tyres reach an end-of-life state they lose their commodity value. This decreases the incentive to store end-of-life tyres appropriately and increases storage risks as described previously.

There is a risk that introducing the proposed NES may result in an increase in illegal dumping of waste tyres due to increased compliance costs. The cost of remediating dumped tyres would fall on councils and/or private landowners. However, existing tyre stockpiles would not be affected if the effects of the activity remain the same or similar in character, intensity, and scale due to the existing use rights exemption under s10 of the RMA.

Illegal dumping of tyres on both private and public land has also been a reported problem. The cost of dumping tyres illegally is seldom borne by disposers but rather those who have responsibility for the affected land.

There are provisions in place through the Litter Act 1979 to prohibit illegal dumping. However, we understand that it is difficult for councils to identify illegal dumpers and councils have limited resource and capacity to address illegal dumpers. The fines associated for dumping under the Litter Act 1979 do not provide a sufficient disincentive for dumping or sufficient compensation to cover the clean-up cost and prosecution (being a maximum of \$5,000 for an individual or \$20,000 for a body corporate).

The proposed NES would not affect tyres disposed of to land (for example, to cleanfills and landfills). Disposal of waste to land in this manner is likely to be subject to a resource consent which should either ensure that tyres are not permitted to be disposed of on the site, or that the adverse effects of their disposal are adequately managed.

Section 3: Our proposal for managing the storage of tyres

Problem definition

The supply of used and end-of-life tyres (ELTs) in New Zealand is increasing. There are limited markets for resource recovery of tyres once they have reached the end of their useable life. Collectors and retailers are incentivised to store and dispose of used tyres in the cheapest way possible to increase commercial margins. As a result, research suggests the majority of used tyres in New Zealand are disposed of in non-levied landfills, stockpiled or illegally disposed of.

Whilst the RMA provides a framework for local government to establish rules to control tyre storage, these options have been, and continue to be, underutilised. Rules that do exist create variation in both content and enforcement. As a result, operators can exploit gaps in regulatory settings by moving used tyre stockpiles between regions. These settings create difficulties for agencies when implementing and enforcing controls, and hinder the collection of information to understand the activity.

These market and regulatory drivers lead to the stockpiling of used and end-of-life tyres. This will increase in future with the growing supply of tyres. Outdoor tyre stockpiles pose risks to the environment, human health, and local communities due to the risk of fire, amenity effects, leaching of contaminants, pest breeding, and stockpile abandonment. The risks a tyre stockpile poses increases with the size of the pile.

Tyres stored indoors have the benefit of being more secure, covered, and not in public view and therefore do not present the same adverse effects and risks.

The Government has already taken steps to address the lack of markets for used tyres through the Waste Minimisation Fund, with funded projects implemented in 2017/2018. However, we are certain that this measure alone will not address the core risks identified to the environment, human health, and local communities as it only addresses the market component contributing to increasing used tyre stockpiles.

Tyre stockpiles are likely to still exist or develop even if markets for ELTs develop. Therefore, the regulatory gap identified above remains the outstanding driver leading to the development of tyre stockpiles.

Objectives

The objectives identified seek to address the adverse effects on the environment and risk of harm to human health and to local communities from the activity of outdoor tyre storage.

The primary objectives of the proposed regulation are to provide certainty that:

- the risks of harm to the environment, human health, and local communities from storing tyres outdoors are appropriately managed
- outdoor tyre storage practices are consistently managed across New Zealand, removing gaps in regulatory settings which create perverse incentives to move tyres between regions.

In assessing options against these objectives it is also desirable that the regulation meets the following secondary objectives:

- measures are easy to understand for councils and operators
- measures are able to be implemented and enforced
- measures provide a way to collect information about outdoor tyre storage.

National direction under the Resource Management Act 1991

To achieve the Government's objectives we are proposing to develop a national environmental standard (NES) under part 5 of the Resource Management Act 1991 (RMA).

The RMA is New Zealand's main piece of legislation that sets out how we should manage our environment. The RMA was created to achieve a more coordinated, streamlined, and comprehensive approach to environmental management.

In general, decisions under the RMA about land and resource use are made by local government (regional councils, unitary authorities, and city and district councils). However, the RMA also allows central government to provide direction on specific national, regional or local issues, using a range of tools.

We consider that the problem of outdoor tyre storage, the objectives of the project, and our proposed solution are aligned with the overarching purpose of the RMA to promote the sustainable management of natural and physical resources. The proposed NES allows for the continuation of tyre storage activities to enable people and communities to provide for their economic well-being while avoiding and mitigating adverse effects on the environment from this activity.

What are national environmental standards?

National environmental standards are legally enforceable regulations made under part 5 of the RMA. They provide certainty by setting out national requirements for particular activities. An NES can prescribe technical standards, methods or requirements for land use and subdivision, water take and use, use of the coastal marine area, discharges, and noise matters. They can also require monitoring, particularly if the standard is aimed at improving the environment.

An NES is a regulation that can control activities directly and independently of regional or district rules. An NES may also prescribe the way councils manage activities and resources, including classifying activities, prescribing methods, or monitoring requirements. However, councils can impose stricter standards through the rules in their plans if the NES specifically states they can do so.

The proposal

We are proposing to develop an NES to manage the risks presented by outdoor tyre storage. In doing so we want to acknowledge that the adverse effects increase when the quantity of tyres stored increases.

The proposed NES would affect district and city councils.

An NES for the outdoor storage of tyres could be comprised of the following controls.

Table 1: Proposed controls for storing tyres outdoors

Tyre volume	Control
1. Small quantities of tyres stored outdoors less than 200m ³	No controls included in the NES, therefore tyre piles of this size would be a permitted activity without standards. However, consent authorities would retain the ability to impose more stringent controls in their district plans.
2. Large quantities of tyres (200m ³ and above)	<p>Classified as a discretionary activity. Before undertaking this activity a resource consent must be obtained from the consent authority, which may include conditions as set by that authority.</p> <p>We consider it would be appropriate for direction to be provided to consent authorities on areas to consider when assessing a resource consent application including, but not limited to:</p> <ul style="list-style-type: none"> • the layout of proposed storage piles (including height of the piles and distance from property boundaries and buildings) • the location of the site • mechanisms for the control of stormwater • mechanisms proposed for fire management (such as security requirements and water supply) • mechanisms for the control of vermin and insects • the duration for which the activity is to be undertaken • the visual and amenity effects of the proposal • whether a bond under section 108 of the RMA is appropriate.

Giving direction to consent authorities on the issues to be considered in a consent application would give certainty to territorial authorities about what they need to consider when assessing applications and also give applicants an idea of the issues they need to cover in their applications.

The NES would also expressly allow district and city councils to include stricter controls in their district plans.

Any additional conditions imposed by councils could directly address the environmental risks of this activity by including location restrictions, fire prevention, and minimisation of fire spread requirements and/or ground cover requirements (to reduce effects of leaching).

The proposed NES would automatically apply to all district and city councils and would override any existing conflicting plan provisions. Consent authorities would put the proposed NES into practice when making resource consent decisions and then enforce it.

The introduction of the proposed NES would not require councils to update their district plans to become effective; however, they may choose to do so, including by ‘piggy backing’ the desired changes into another plan change. Implementing an NES saves councils the cost of undertaking a plan-change process and any potential submitters the cost of submitting on proposed local plan changes. National regulation through an NES would provide certainty for operators storing tyres across multiple regions and would also allow for consistent gathering of information.

Due to existing use rights under the RMA, an NES would not apply to existing tyre stores, provided the effects of the activity are the same or similar in character, intensity, and scale to those which existed before the NES became operative.

Before the release of this consultation document, a range of regulatory and non-regulatory options were considered as part of the Ministry for the Environment’s regulatory impact analysis. The regulatory impact analysis considers the development of an NES under the RMA to be the most targeted and effective intervention to manage the risks with storing tyres.

The effects of the proposed regulation, including the affected activity type, are discussed in [Section 4](#) of this document.

Section 4: Effects of the proposed National Environmental Standard

This section considers the effect that the proposed National Environmental Standard (NES) would have on the New Zealand public, including councils, businesses, iwi authorities, and consumers. It is framed by the activities in scope and a suggested timeframe for entry-into-force of the proposed regulatory framework.

We want **your feedback** to inform the process of making regulations. We have provided specific questions under each of the subheadings of this section (activities in scope, and timeframe) to guide your feedback.

What activities would be in scope of the proposed National Environmental Standard?

Activities in scope

The proposed NES would affect individuals / businesses differently depending on the volume of tyres that are being stored outdoors on a property. Tyre stores that are larger than 200m³ would require a resource consent from the local council as a discretionary activity (such consent could include conditions set by council).

We estimate that a volume of 200m³ tyres is equivalent to approximately 2500 standard passenger tyres (EPUs) (loosely stacked) or 3800 EPUs (laced). Draft New Zealand Fire Service advice recommends that individual tyre piles do not exceed 360m³. The proposed NES takes a precautionary approach by setting threshold at which consent is required at 200m³ or above.

Tyre storage

We consider that 'storage or storing tyres' is the action or method of storing something for future use. Under the proposal a tyre would be deemed to be stored when it is present on a property. There would not be any timeframes that need to be met before 'storage' is triggered.

State of tyres

The NES would apply to tyres in all states for example, whole, chipped, shredded.

Outdoor storage

We consider outdoor storage is when tyres are not stored in a building which includes walls on all sides and a roof. Should this proposal proceed, further detail would be incorporated in the drafting of the NES.

Activities out of scope

Any tyre stores of less than 200m³ would not be subject to the proposed NES. This threshold is anticipated to exclude small tyre stores for legitimate purposes (such as tyres used for silage cover) which present a reduced level of risk. This level of tyre storage would become a permitted activity without standards by default as it is not specially mentioned in the NES.

Questions

1. Do you agree with the Government's proposal to develop a national environmental standard to control the activity of storing tyres outdoors? Why/why not?
2. Do you agree with the proposed definition of tyres (all pneumatic (air filled) tyres for cars, motorcycles, trucks, buses, off-road vehicles, aircraft, and certain solid tyres (forklifts), but not bicycle tyres)? Why/why not?
3. Do you think the proposed volume threshold of 200m³ is appropriate? Why/why not?
4. Do you agree with the Government's proposal to classify outdoor tyre stores of more than 200m³ as a discretionary activity under the Resource Management Act 1991 (instead of a restricted discretionary activity)? Why/why not?
5. Are you aware of any activities that may involve the storage of tyres outdoors which should be exempt from this proposal? If so, what are they and why should they be exempt?
6. Do you think it is appropriate to provide direction to consent authorities when processing consents in the NES? What do you think of the matters proposed to be considered in table 1 in this consultation document?

Questions for the tyre industry

7. Do you currently store tyres outdoors? If so, how many?
8. Do you anticipate the introduction of the NES would have either positive or negative impacts for you or your business? If yes, please explain.
9. Do you anticipate the introduction of the NES would have a cost impact on you or your business? If yes, please explain.

Questions for local government

10. Do you consider the proposal to be workable in practice, that is, would your organisation be able to issue consents, monitor activities, and enforce the proposed NES?
11. What additional conditions do you consider should be mandated, if any, by the NES?
12. Do you have any additional information about the impacts from storing tyres on the environment, economy or communities?

Timeframe

The Government proposes that, should the proposed NES be developed under part 5 of the RMA it could enter into effect by mid-2018.

Should this proposal proceed, upon entry-into-force, the activity of storing more than 200m³ of tyres would be classed as a discretionary activity.

Any persons seeking to undertake this activity must obtain a resource consent, and if these regulations are breached the enforcement mechanisms of the RMA would apply.

The proposed timeframe would enable the Government to undertake the necessary policy decisions and processes, and would provide businesses, consumers and regional and district councils with enough lead-in time to prepare for entry-into-force of the NES.

We consider this to be a reasonable amount of time for any individuals and businesses that currently store or plan to store tyres outdoors to plan for the proposed requirements.

Questions

13. What are your views on the Government's proposed timeframe for entry-into-force of the NES under part 5 of the RMA?
14. Are there any issues about the proposed timeframe for entry-into-force of the NES that the Government should consider?
15. Are there any ways the Government could help businesses, consumers and local government to prepare ahead of the regulations' entry-into-force?

Section 5: Consultation process

How to make a submission

The Government welcomes your feedback on this consultation document. The questions posed throughout this document are a guide only and all comments are welcome. You do not have to answer all the questions.

To ensure your point of view is clearly understood, you should explain your rationale and provide supporting evidence where appropriate.

You can make a submission in three ways:

- use our online submission tool, available at www.mfe.govt.nz/consultation/proposed-national-environmental-standard-outdoor-storage-of-tyres. This is our preferred way to receive submissions
- download a copy of the submission form to complete and return to us. This is available at www.mfe.govt.nz/consultation/proposed-national-environmental-standard-outdoor-storage-of-tyres. If you do not have access to a computer, a copy of the submission form can be posted to you
- write your own submission.

If you are posting your submission, send it to A Proposed National Environmental Standard for the Outdoor Storage of Tyres, Ministry for the Environment, PO Box 10362, Wellington 6143 and include:

- the title of the consultation (A Proposed National Environmental Standard for the Outdoor Storage of Tyres)
- your name or organisation
- postal address
- telephone number
- email address.

If you are emailing your submission, send it to tyre.submissions@mfe.govt.nz as a:

- PDF
- Microsoft Word document (2003 or later version).

Submissions close at 5.00 pm on Friday 4 August 2017.

Contact for queries

Please direct any queries to:

Email: tyre.submissions@mfe.govt.nz

Postal: A Proposed National Environmental Standard for the Outdoor Storage of Tyres,
Ministry for the Environment, PO Box 10362, Wellington 6143

Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment's website, www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, the Ministry will consider that you have agreed to have your submission and your name posted on its website.

Contents of submissions may be released to the public under the Official Information Act 1982 if requested. Please let us know if you do not want some or all of your submission released, stating which part(s) you consider should be withheld and the reason(s) for withholding the information.

Under the Privacy Act 1993, people have access to information held by agencies about them. Any personal information you send to the Ministry with your submission will only be used in relation to matters covered by this document. In your submission, please indicate if you prefer we do not include your name in the published summary of submissions.

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