

# AUDIT HANDBOOK – FOR RETAILERS

**MARCH 2019** 

#### PURPOSE OF THIS HANDBOOK

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

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

TSA manages audits of Scheme participants, including Retailers and reports to the Tyre Stewardship Australia 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 Retailers

All Scheme documents, including this handbook, are available on the Internet at <a href="mailto:tyrestewardship.org.au">tyrestewardship.org.au</a>

#### Further information contact TSA:

Tyre Stewardship Australia

Phone: (03) 9977 7820

Email: <u>info@tyrestewardship.org.au</u>
Website: <u>tyrestewardship.org.au</u>

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### INTRODUCTION

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### 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 ACCC re-authorisation in June 2018. The objectives of the scheme are to:

- Increase resource recovery and recycling; 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**), 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 end-of-life tyres are disposed of in a way that represents environmentally sound use (ESU).

There are several categories of Participants 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).

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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 apply to the environment and occupational health and safety.
- 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.

#### Tyre Retailers play an important role in the Scheme, and are defined as the following:

**Tyre Retailer** means a business or organisation that offers products for sale at retail through any means, including sales outlets, catalogues, or the Internet. For the purposes of the Scheme, a tyre retreader is also a retailer.

#### Retailers have specific, additional commitments, these are:

To:

- a. take responsibility for environmentally sound use of EOLTs left with retailers when consumers purchase tyres.
- b. deal only with collectors and recyclers accredited by TSA when disposing of EOLTs.

or

- c. where dealing with a non-accredited collector, ensure contractual arrangements specify that all EOLTs are provided to an accredited tyre recycler for environmentally sound use.
- d. Regularly provide data (report) to TSA on the types and numbers of EOLTs provided to tyre collectors and/or recycler and/or their alternative disposal route, as directed by TSA.
- e. deal ethically and transparently with consumers, specifically in relation to the fees and charges associated with the environmentally sound use of EOLTs, and
- f. undertake regular reviews of arrangements with collectors and recyclers.

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# 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 Retailers 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 Retailer must complete the steps below in order to obtain TSA accreditation.

 <u>Retailer</u> submits online application, that includes an outline of the operations and an Action Plan. <u>TSA</u> will contact applicant to confirm receipt of application.



2. <u>TSA</u> undertakes verification of application (including business details) and submits to TSA Board for approval.



 Once application for Retailer accreditation is approved by the TSA Board, <u>TSA</u> will arrange for accreditation pack (including TSA certificate/sticker) to be sent to Retailer.



4. As part of maintaining accreditation, Retailers commit to participating with random risk based audits as instigated by TSA. TSA Audit and Compliance Program randomly audits 5 percent of accredited Retailers annually.

### 2.3 TYRE PRODUCT STEWARDSHIP SCHEME (TSA) AUDITS

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

Retailers 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. This determines whether a Retailer in the Scheme is compliant in meeting its commitments as set out in **the Guidelines** and TSA Accreditation Logo Style Guide<sup>1</sup>.

The key purpose of a TSA audit is to determine whether the Retailer 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, the interests of Participants and the sound management of EOLTs.

As a voluntary scheme, 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 Retailer's suspension or revocation from the Scheme. Refer to section 2.6 for suspension/revocation process.

<sup>1</sup> TSA Style Guide is available upon request from TSA, to accredited participants.

TSA operates one audit type for Retailers:

1. Compliance Audits – ensure that Retailers are compliant with their TSA commitments on an ongoing basis.

TSA Audit and Compliance Program randomly audits 5 percent of accredited Retailers annually. If a Retailer 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.

#### 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 and by auditors. When handling information regarding Retailers, 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 Retailers identities and audit timings during the Audit Programs. However, if required to make a decision regarding a Retailers 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 Retailer is no longer part of the Scheme for either of the reasons discussed in Section 2.6.

# 2.6 NON-COMPLIANCE ENFORCEMENT – SUSPENSION OR REVOCATION OF SCHEME ACCREDITATION

Where a tyre Retailer has breached the requirements TSA, may:

- suspend a Retailers accreditation immediately by giving notice in writing; or;
- revoke a Retailers accreditation by giving 30 days' notice in writing.

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

An audited Retailer will first be provided with a reasonable opportunity to rectify the non-compliance within the **Correction action closure timelines** as per Table 2 (**Attachment 2**). If the breach is not rectified within that period, TSA may elect to immediately suspend or revoke the Retailer's accreditation.

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 Retailers accreditation is suspended, the Retailer 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 Retailer accreditation is revoked, the business or organisation can re-apply for accreditation after 12 months have lapsed.

As a consequence of leaving the Scheme, through either resignation or revocation of the Retailer 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.

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

## DETAILED ACCREDITATION AND COMPLIANCE AUDIT PROCESSES

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#### 3.1 ANNUAL COMPLIANCE AUDITS

- TSA Auditor develops schedule of annual compliance audits for Retailers.
- 2. TSA Auditor contacts site/s at least two weeks prior to approximate audit date/s 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 fills out a preliminary report of potential areas of concern (risk) at the time of the audit and provides it to the site. This effectively is a high-level overview of the audit findings.
- TSA Auditor prepares draft audit report (within two working weeks of audit) and detailed non-compliances and actions required by the Retailer and provided timelines for compliance based on the risk matrix.
- TSA Accreditation and Compliance Manager reviews and approves draft audit report.
- 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.
- The actions listed in the Audit Report forms the Retailer'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 COMPLIANCE AUDITS FOR RETAILERS

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#### 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.
- Environmentally sound use of EOLT's

#### Retailers

- Deal with TSA Accredited Collectors and Recyclers
- Data Reporting
- Transparency of Fees Charged for Collecting
- Records/Inventory Management
- Action Plan refer to Attachment 3 for example of Action Plan template post compliance audit

#### General Regulatory requirements

For Retailers this is limited to tyre storage and fire safety (emergency response), as per <u>TSA Best Practice Guidelines for Tyre Storage and Fire and Emergency Preparedness</u>:

- Tyre Storage
- Site Access
- Site Security
- Hazardous Chemicals/Waste
- Sprinklered and Un-sprinklered Buildings Tyre Storage
- Containment of Contaminated Water
- Fire Safety

## REQUESTED DOCUMENTATION AND INFORMATION FOR AUDITS

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The following is a summary list of documents and information that may be requested by TSA when conducting a document audit to assess a Retailer's compliance with the Scheme. Refer to **Attachment 1** for further information.

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

- TSA Action Plan
- Tyre inventory records and reporting
- Tyre stockpile management practices/procedures, where applicable
- Evidence to guarantee an environmentally sound end use of product when transferred to Down Stream Vendors (ie accredited TSA Recyclers/Collectors documentation)
- Fire/Emergency management plans/assessment reports/inspection certificates
- Storage of chemicals including diesel and oils

## 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. Cross reference with TSA Branding Guidelines.
Comply with relevant laws and practices, including those that apply to the environment and occupational health and safety (OHS).	Reference: OHS policies and procedures, environmental policies and procedures, application, licenses where necessary.
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.

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#### **RETAILERS**

REQUIREMENT	ASSESSMENT
Take responsibility for the environmentally sound use of end-of-life tyres (EOLTs) received when consumers purchase tyres.	Evidence: Observe procedures for storage and collection of EOLTs, view record keeping showing collection of end-of-life tyres, interview staff (contracts with collector/recycler, inventory management system).
Provide data to TSA on the types and numbers or tyres requiring disposal for, sold in each reporting period.	Evidence: Reporting regularly to TSA Reporting Platform
Provide data to TSA on the types and numbers of tyres sold for a specific reporting period, during site (spot) audits only.	Evidence: Invoices, receipts provided at time of on-site audit.
Deal only with collectors and recyclers accredited by TSA (or, when dealing with a non-accredited collector, ensure that contractual arrangements specify that all end-of-life tyres are provided to an accredited tyre recycler).	Evidence: Observe procedures for storage and collection of end-of-life tyres, view record keeping showing collection of end-of-life tyres (invoices/receipts, government records/inventory requirements e.g. WasteLocate in NSW), interview staff (destination of tyres, procedure when picking up i.e. invoicing/receipts given by collector).
Deal transparently and ethically with others involved in the tyre supply chain, specifically in relation to the fees and charges associated with the environmentally sound use of EOLTs.	Evidence: Examine receipts given to customers showing fees, examine records of payments to collectors and recyclers (invoices/receipts), interview staff (fate of tyres, inventory management system, government mandated inventory requirements e.g. WasteLocate in NSW).

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## 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;
	<ul> <li>Evidence establishes that Participants do not have arrangements in place to recycle all Scheme tyres;</li> </ul>
	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;
	<ul> <li>Verification process indicates that a Participant does not have arrangements in place to recycle all Scheme tyres;</li> </ul>
	<ul> <li>Failure by Participants to provide data and failure or delay in contributing to verification process.</li> </ul>
	Not reporting regularly via the TSA Reporting Platform;
	Unsecure outdoor storage of end-of-life tyres. Theft and/or dumping has been an issue;
	<ul> <li>Misuse of logo, e.g. in an inappropriate context such as on the side of skip used for general waste;</li> </ul>
	First incident for the above examples or similar;
	<ul> <li>Numerous instances of low-level non-compliance that, together, cannot be regarded as minimal.</li> </ul>

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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
	<ul> <li>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);</li> </ul>
	<ul> <li>End-of-life (EOL) tyre storage is outside and covered, but not secure (i.e. locked).</li> <li>Theft and/or dumping has not been an issue.</li> </ul>
	<ul> <li>Lack of cooperation or delay by Participants in providing data regarding recycling of all Scheme tyres;</li> </ul>
	<ul> <li>Intelligence received that a Participant does not have arrangements in place to recycle all Scheme tyres;</li> </ul>
	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 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

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### 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	Low Risk Finding				
Best Management Prac	Best Management Practice				
Area of Potential Concern					

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### ATTACHMENT 4 AUDIT CHECKLIST FOR RETAILERS

The following compliance checklist for Retailers<sup>2</sup> provides Participants with a list of audit questions and associated evidence 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 TSA reporting and downstream vendor management, ie use of Collectors/Recyclers accredited by TSA when disposing end-of-life tyres.

While it is not TSA's remit to undertake an audit of Environmental, Health and Safety (EHS) aspects as part of the accreditation and compliance audit process (for Retailers), 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.

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<sup>2</sup> Note that as part of continuous improvement of the Scheme audit questions may change from time to time, i.e. compliance checklist is provided as a guide only. This checklist is to be reviewed on an annual basis.

### 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	
	Other	
Does t	the Participant deal transparently and ethically with others involved in the tyre supply chain?	
	Evidence of tyres sent to environmentally sound use (ESU)	
	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	
	the Participant use the scheme's branding and logo and adhere to the conditions that apply to se, as set out in Part B of the Guidelines for tyre stewardship scheme?	
	Logo is visibly displayed at the site	
	TSA logo on store window	
	Logo is used on documents and publications	
	Use of logo is appropriate	
If appli	cable, how many tyres left the site to a third party for end-use?	
	Proof of number OUT	

Number comparable to annual reports

	ne accredited Participant provided data to TSA on the number and fate of tyre EPU provided for vironmentally sound use?  Monthly data in TSA system	
	Working data in 107 (o) old in	
Does	the site have an Action Plan? Is it in compliance with the Plan?	
	TSA Action Plan	
	Evidence of progress against targets	
	Staff interview confirms understanding and support of the Scheme	
	Other	
	Invoices	
Does the Participant deal only with collectors and recyclers accredited by TSA (or, when dealing with an interim non-accredited collector, 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	
	Standard Scheme Dockets used	
	Dockets show tyres only sent to Scheme Participants	
	Contracts with non-accredited collectors specify tyres go to ESU	
	Other	
relatio	the Participant deal ethically and transparently with consumers and other outlets, specifically in on to the fees and charges associated with disposal of end-of-life tyres? How much is charged, it adequately explained?	
	Invoices show charge	
	Invoices explain charge included	
	Advice provided explaining charge on invoice	
	Poster visible explaining charge	
	Where charge is for recycling, tyres are recycled	
	Other	

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#### 2.0 GENERAL REGULATORY REQUIREMENTS

□ Are tyres stored away from stormwater (SW) drains?□ No SW drains in storage area

Risk of SW contamination evident

No observed risk of SW contact contamination

Storage area in close proximity to SW drains

General Environment, Health and Safety

2.1	SEC	URITY
	The sit	re has appropriate security measures to prevent unauthorised entry, which are secure and well nined
		Security fencing
		Secure lockable gates
		CCTV cameras
		Motion detectors, sensor lighting
		Alarm system
		Other
2.2	ENV	TRONMENT – HOUSEKEEPING
	House	keeping across the site considered to be generally:
		Poor
		Acceptable
		Good
		Excellent

2.3	ENV	IRONMENT – CHEMICAL STORAGE
	Does t	he site store chemicals on site? (if not, go to the next section)  Yes  N/A
		the site maintain all required HazChem/Dangerous goods documentation including safety neets (SDS)?  Hazardous chemical/dangerous goods register  SDSs available (less than 5 years old)  Inadequate HazChem records
	Does t	the chemical storage area have appropriate containment?  Bunding  Appropriate storage cabinet  Inappropriate storage
2.4	OHS	S – EMERGENCY PREVENTION, PLANNING, AND RESPONSE
	Does t	che site have an emergency plan and is it regularly reviewed?  Site emergency plan  Next review date indicated  Plan is up to date

#### 2.5 FIRE SAFETY

For Retailers guidance on tyre storage and fire safety refer to Tyre Stewardship Australia Best Practice

Guidelines on Tyre Storage and Fire and Emergency Preparedness. These guidelines present the Essential Requirements which have been deemed to comply with regulations across each Australian jurisdiction.

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