TyreStewardship
AUSTRALIA

TSA FEMV Program User Manual

Version 1.0
November 2025

Australian Government Accredited Product Stewardship Scheme

TSA FEMV Program
User Manual

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Acknowledgement

Tyre Stewardship Australia acknowledges the Traditional Custodians of the land and waterways on which we live, work, and depend. We acknowledge the unique spiritual and cultural connection, and continuing aspiration that the Traditional Owners have for Country, and we pay respect to Elders, past, present, and emerging.

Contents

Introduction

Tyre Stewardship Australia's Foreign End Market Verification (FEMV) program aims to prevent environmental and social harm associated with the processing of exported End-of-Life Tyres (EOLT) and Tyre-Derived Material (TDM) in the destination country.

Verification of facilities processing exported EOLT and/or TDM gives Tyre Stewardship Australia (TSA), tyre exporters and the broader community reasonable assurance that the facility is a genuine processing facility (rather than simply a "hub and spoke" model) that meets local regulatory requirements and some basic minimum standards in the areas of Modern Slavery, Health and Safety, and Environmental management. This will help to minimise the risks of serious social or environmental harm at the site, making it a credible location to receive imported EOLT and/or TDM.

TSA has partnered with Intertek, an industry leader in quality assurance and supply chain management, to design and implement the verification process. Intertek's Inlight™ platform helps each facility navigate through the process of becoming a TSA FEM Verified site.

The purpose of this User Manual is to provide the users of the FEMV program (both exporters of tyres or TDM, and their overseas customers) with more detailed information about the program and how it operates.
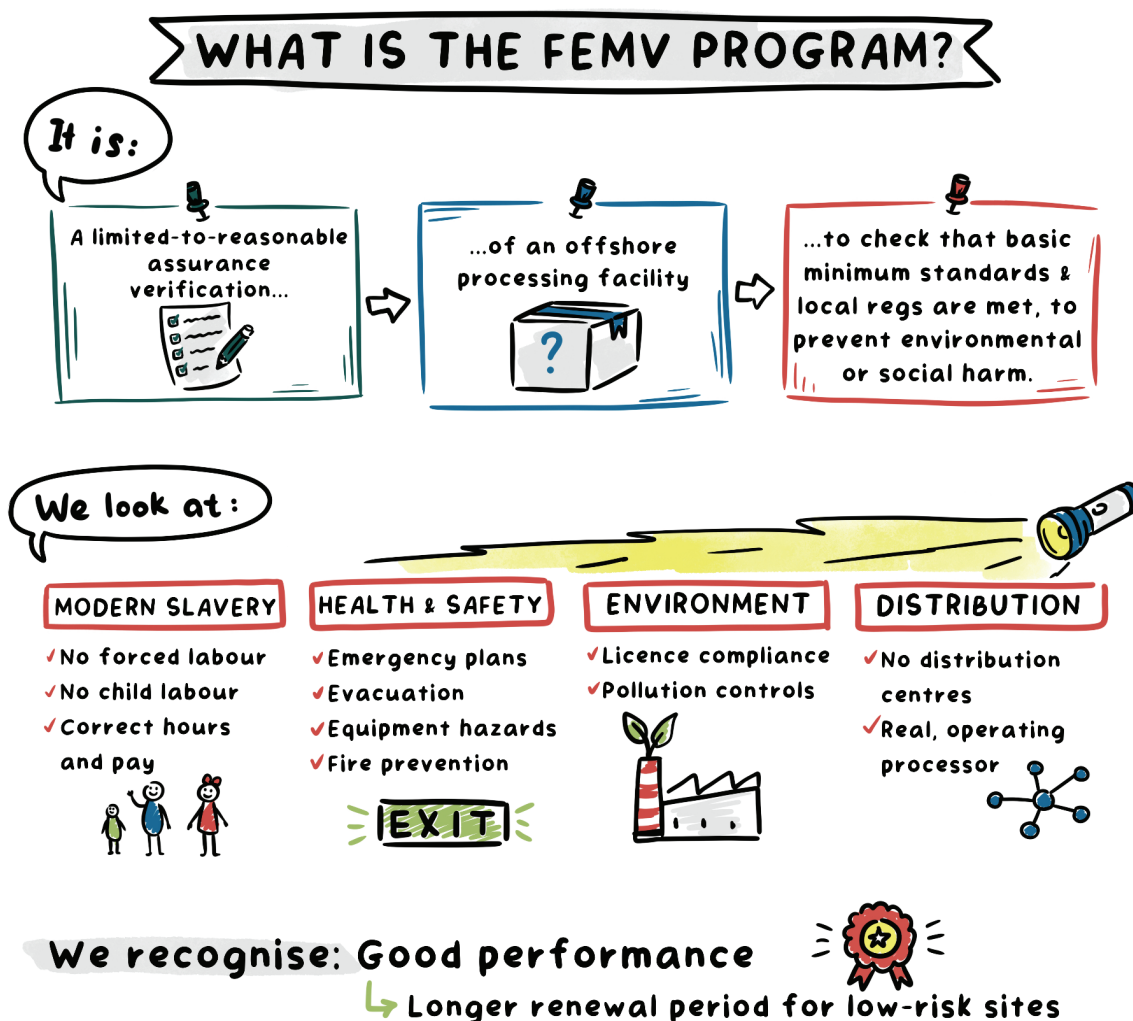
Some Definitions

Requestor: Is the entity making the request for the FEM Verification of an overseas processing facility. This may be the exporter, the End User themselves, or another party.

End User: Also known as the "Supplier" in Intertek's Inlight Platform, this is the site that is receiving exported end-of-life tyres or tyre-derived material (TDM) that is seeking to be Verified by the program.

Interested Parties: Are entities that have a demonstrated commercial or regulatory interest in the FEMV status of a particular End User. This includes DCCEEW in Australia where FEMV has been requested as part of the export licensing process.

What you need to know

What is the Scope of the FEMV program?

Who can we Verify?	• Facilities (sites) that accept imported EOL Tyres or Tyre-Derived Materials for retreading, for further processing, or for manufacturing into final products. • Facilities using imported TDF for energy recovery and/or as a source of carbon in their process, e.g. Cement kilns, Waste-to-Energy facilities. • The site must be operational and a single facility.
Who will we not Verify?	• Sites that are simply distribution centres or warehouses without any on-site processing. • Whole businesses with multiple processing facilities – we will verify one facility at a time.

What do we check?	• Compliance with local regulations and basic minimum standards in the areas of:
	  – Modern Slavery / Social Compliance
	  – Health & Safety
	  – Environment
	  – Distribution
	• More information on what we check can be found in *Appendix A – Assessment Criteria*

What don't we check?	• We don't check product quality or compliance with product specifications. • We don't check compliance with laws governing exports, imports or international trade e.g. sanctions, tariffs, tax, etc.

How do I apply if I am an exporter, or if I am a processor of exported materials?   3.2
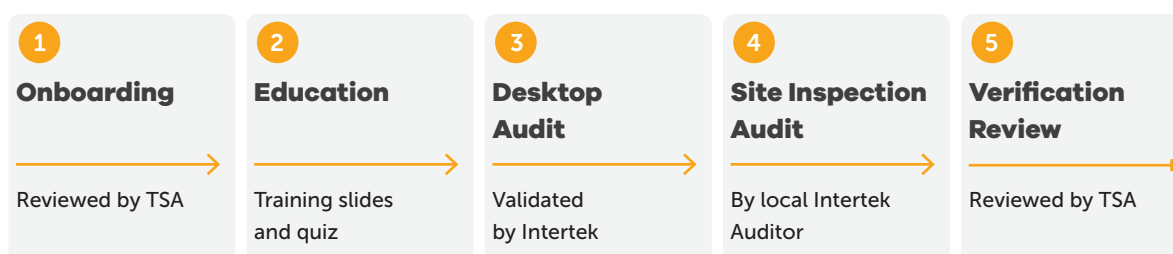
- You can email TSA at getonboard@tyrestewardship.org.au with your request and the FEMV program administrator will respond
  - In future you will be able to complete an online application via TSA's website. This will include formal acknowledgement of the Terms and Conditions of the program (refer to *Appendix B - General User Terms* and *Appendix C - End User Terms* for details).
- TSA requires the following information to get the site started:
  - The name of the processing site/facility to be Verified (the **"End User"**)
  - The street address of the site (not the head office) including city, region/state and country
  - The type of EOLT or tyre-derived materials accepted by the facility e.g. whole tyre casings, shred, granules etc.
  - The types of processing activities conducted at the site, e.g. retreading, shredding, granulation, crumbing, manufacturing.
  - The first and last names of the site contact who is authorized and capable of completing the online assessment tasks in English on behalf of the site (noting that site documents and records can be submitted in the local language – no translation is necessary).
  - The direct contact details - IDD phone number and email address - for the site contact.
- You should seek the consent of the End User & make sure they are informed about & agree to participate in the process. This is extremely important as there is work involved for the End User, so their buy-in is crucial to their success in the program. TSA will check in with them when we receive your request to confirm their willingness to participate.
- TSA will need to see evidence that you have a commercial relationship with the End User before it can progress your request. TSA won't provide you with any information on whether the End User is participating in the program or their verification status without this evidence.
- Once the commercial relationship has been confirmed, TSA will undertake to provide you (and possibly other interested parties) with information on the participation status of the End User and whether they have achieved Verified status.

What are the steps involved in becoming a TSA FEM Verified Site?   3.3

The FEMV Work Process follows these steps:

1 Onboarding	**2** Education	**3** Desktop Audit	**4** Site Inspection Audit	**5** Verification Review
Reviewed by TSA	Training slides and quiz	Validated by Intertek	By local Intertek Auditor	Reviewed by TSA

- **Onboarding:** To enrol an organisation in the program, we will collect some information about the site including contact details. Once the online application process is implemented, both the **Requestor** and the **End User** will be asked to acknowledge some Terms and Conditions (refer to *Appendix B - General User Terms* and *Appendix C - End User Terms*) during the application process. TSA will review each application and advise the parties if and when it has been accepted.

- **Education:** You (the **End User**) will view a training presentation that outlines the FEM Verification program and explains what you need to do to achieve FEM Verified Status. After viewing this presentation, you will be asked to complete a short quiz about the FEM Verification program to confirm your understanding. Once complete you can move to the next stage – Desktop Audit (SAQ).

- **Desktop Audit (SAQ):** You will be asked to complete a Desktop Audit (referred to in Inlight as a **Self-Assessment Questionnaire (SAQ)**). There are roughly 100 mandatory questions in the SAQ (refer to Appendix A – Assessment Criteria) and it may take several hours to complete - depending on how readily you can find the requested information about your business and the site being Verified. You will be asked to upload copies of documents as evidence to support your responses (we suggest collating these in an evidence folder that you can refer to in the Site Inspection). The purpose of the SAQ is to check that expected documents (such as policies and procedures) are in place before we proceed with a Site Inspection.

  - The Desktop Audit (SAQ) covers these key focus areas:
    - Modern Slavery / Social Compliance (including prevention of forced or child labour and compliance with local regulatory requirements around wages and working hours)
    - Health & Safety (including emergency response planning and equipment and management of key plant operating hazards)
    - Environment (including compliance with permits, management of pollution hazards and waste disposal)
    - Distribution (ensuring imported tyres are processed on site and not simply re-distributed).

  - **Documents uploaded to the Inlight Platform are treated as confidential by both Intertek and TSA.** You should not need to submit any individual's private information. Please reach out if you have any concerns about the requested evidence.

  - Once you submit your Desktop Audit (SAQ), Intertek will review your responses and provide both you and TSA with a Supplier Evaluation Report and a validated score. The report may identify areas for improvement. If TSA's criteria are met, the process advances to the Site Inspection. If gaps exist, the site must complete a Corrective Action Plan (CAP) before proceeding.

- **Site Inspection (Audit):** A site inspection will be arranged at a time mutually agreed between your site and Intertek's local in-country auditor. The inspection will test the implementation of controls that mitigate against the risk areas of concern from the SAQ, including reviewing records, visiting the site and speaking with both managers and workers. The questions in the Audit template are aligned with those in the SAQ. Once the inspection has been completed, a formal report will be written and provided to the site and to TSA.

- **Verification Review:** TSA will review the Site Inspection report and determine whether your site meets its criteria for granting Verified Status, and if so, the period that the Verified Status will be valid for (either 1 or 2 years from the date Verified Status is granted, depending on your score).

  - If your site meets the criteria for "FEM Verified Status", you will receive a formal letter confirming this with an expiry date. The Requestor will be advised of the outcome as well. You will be advised of the expiry date of your TSA FEM Verified Status.

  - If your site does not meet the assessment criteria for verification at this point, you will be advised of this outcome and what you need to do to achieve Verified Status. There are options including a **"Corrective Action Plan" (CAP)** that may assist you to work on improvement opportunities at your own pace. Intertek will assist when you are ready to undertake a follow-up audit (either desktop or in the field) to verify that gaps have been sustainably closed.

- **Renewal Process:** Sites will be notified when their "FEM Verified Status" expiry date is approaching and will have the opportunity to participate in a renewal process to confirm that the site continues to meet the verification criteria. Sites that do not elect to participate in the renewal process will lose their "FEM Verified Status". Sites that take more than 6 months to complete the renewal process may also lose their "FEM Verified Status".
  - The Renewal process follows the same steps as the initial verification process.

How does TSA decide who is Verified?   3.4

- When an assessment activity is carried out there is a determination as to the severity rating of any non-compliance findings. Non-compliances are rated as "Major", "Moderate" or "Minor". TSA regards "Moderate" and "Minor" findings as improvement opportunities that a site can work on between verifications, however **any "Major" severity findings must be satisfactorily addressed before a site can progress to the next stage or achieve Verified Status.**
  - **Desktop audit (SAQ) pass requirement:** If there are no "major" severity findings open following the SAQ, site can progress to Site Inspection.
  - **Overall Verified Status requirement:** If there are no "major" severity findings open following the Site Inspection, then site can be awarded Verified Status.
  - **Verified Status Expiry:** If the Site Inspection result is low-risk (score >= 85%), the expiry date will be 2 years from Verified date. If the Site Inspection result is not low risk (score < 85%) the expiry date will be 1 year from the Verified date.

What does it cost, and who pays?   3.5

- TSA has historically paid charges relating to Verification activities for all sites to be Verified and will continue to pay for sites that are nominated by **Australian exporters**.
- TSA is implementing a user-pays model **in cases where the Requestor is not based in Australia**. This will be communicated to affected parties. Sites that are part-way through the verification process (either for initial verification or renewal) will be able to complete the process at TSA's expense.
- If TSA is paying, then the only cost to the End User is their time & resources used to complete the assessment tasks and to close out any findings identified during the process.
- Where user-pays applies, the cost will be per TSA & Intertek's current Inlight Service Agreement & charged **in advance** on an activity basis (refer to *Appendix E - Activity Fee Schedule* below). The cost will be paid by the Requestor who has nominated the End User to participate in the program.
- For renewing sites, TSA will notify the site (and the associated Requestor) that the site's verification is due for renewal. A new application for Verification will be required and acceptance of the Terms and Conditions (including user-pays where applicable) will be required.
- There will be no refunds for activities not completed, or for a no-show by the site at a scheduled site inspection.

How long does it take to get Verified?   3.6

- There is no time limit for new participants to work through the verification process – only for renewing sites wishing to retain their Verified status.
- The time taken to achieve Verified status depends on how engaged the End User is with the process. There is work involved in completing the assessment tasks (especially the SAQ). The table below is provided as an indication of how long the different steps can take but is not a guarantee.

- If the End User does not see the value in becoming Verified, they may struggle to complete the process. Requestors are encouraged to actively support their nominated sites.

- If the End User doesn't meet the criteria to progress from SAQ to Site Inspection, or if they don't meet the verification criteria after the Site Inspection, they will need to work through resolving some non-compliances. Depending on the nature of the gaps, this can take some time.

- The table below provides some **estimated durations** for each step in the process:

Process Step	Estimated Duration
Application & Onboarding (TSA/Intertek)	1 week from receipt of application
Training Quiz (site)	Up to 1 week from confirmation of payment (where applicable)
SAQ Submission (site)	2-4+ weeks, site dependent
SAQ Review & Supplier Evaluation Report (Intertek)	2 weeks from submission of SAQ
Follow-up / Corrective Action Plan (site) + verification (Intertek)	If needed, 2-4 weeks depending on number of findings
Site Inspection (Intertek / site)	Up to 6 weeks for scheduling/prep 2 days on site 4 weeks for reporting / QA
Verification Review (TSA)	1 week from receipt of Inspection report
Follow-up / Corrective Action Plan (site) + Verification (Intertek)	If needed, 4 weeks + depending on number of findings & action required
Total Estimated Time	**17 to 23+ weeks**

Use of the "FEM Verified" Mark　　　　　　　　3.7

- End Users will be provided with an official letter when their site becomes Verified. They may show this letter to their business partners or others as needed to demonstrate their Verified Status.

- TSA will confirm the Verified Status of End Users when requested (after confirming that a commercial relationship exists between the parties) or if it becomes aware of incorrect claims being made.

How is my information handled?　　　　　　　　3.8

- End Users' information (documents submitted during the assessment, and detailed assessment reports) will be treated confidentially and not shared with other parties without their permission.

- TSA can share a Summary Report with Requestors at the completion of assessment activities (see *Appendix D - Example Summary Report*).

- Refer to *Appendix B - General User Terms* and *Appendix C - End User Terms* for more details.

How do I get help or find out the status of my End Users? 3.9

- End Users can use the help feature in the Inlight platform to seek assistance from Intertek, or they can reach out to TSA for help if needed.
- Requestors can contact TSA for updates on the progress of End Users they have nominated for verification.
- If you can demonstrate that you have a commercial relationship with an End User but you are not the Requestor, you can request information on the End User's Verified Status from TSA.

Other Frequently Asked Questions. 3.10

Q **I'm based in a developed country with strong regulations in place. Everyone has to comply with the law. Why are you asking me these questions?**

- The FEMV assessment process is the same for everyone regardless of where your site is based, to ensure the process is fair and equitable.
- Even in well-regulated nations, modern slavery and unsafe workplaces still exist. Not all regulators are well resourced to enforce the rules across all industries.
- Operators in more developed countries should still have policies and procedures in place to ensure local legal requirements are met. If anything, you should be in a better position to provide supporting documentation.

Q **Why do I need to do the SAQ – can't you just come and do an audit?**

- The purpose of the SAQ is to ensure sites have documented systems in place such that they are likely to be successful in the audit phase. The audit is the most expensive part of the process so we want to maximise the likelihood of a successful outcome from the audit.
- The Site Inspection (audit) is intended to be a field verification that the processes reviewed in the SAQ have been implemented and are effective. We don't want to waste the auditor's time on site reading documentation when they could be speaking with staff and out in the plant.

Q **What should I do if my End User's nominated contact is no longer the right person?**

- Let TSA know straight away (provide updated name, email and phone number) so that we can update our records and continue to help the facility to progress.
- Similarly, if there are other changes to the business (e.g. relocation, change of business name, changes in processing equipment), please let us know so that we can determine whether your verification remains valid.

Q **Does FEM Verification satisfy DCCEEW's needs for retread facilities to be "appropriate" under the waste export rules?**

- Not entirely, but FEMV is regarded as helpful by the department in making this assessment.

Appendix A – Assessment Criteria   4

[TSA FEMV Assessment Criteria](#) document.

Appendix B – General User Terms   5

The [General User Terms](#) have been created to ensure applicants are clear on how the FEMV process will operate. They will be incorporated into the online application process. Applicants (being either the Requestor and/or the End User) will be required to accept the General User Terms before submitting their application for verification of an End User.

Where the applicant is not the End User, TSA will also seek the consent of the End User to the terms found below prior to accepting the application.

Appendix C – End User Terms   6

The [End User Terms](#) are separate Terms for End Users (the overseas site being Verified) as they are often nominated by other parties ("Requestors"), and it is important that they provide informed consent to their participation in the program.
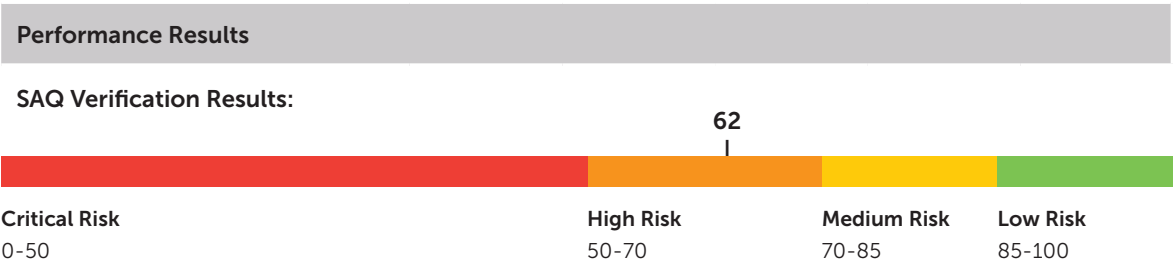
If an End User self-nominates to participate in the program, they will have to accept **both** the General User Terms and the End User Terms before submitting their application.

Appendix D – Example Summary Report

<div align="right">7</div>

TSA will provide Requestors with a copy of this summary report (if requested) when an End User completes an assessment activity during their verification process. Requestors may discuss with the End User and seek more detailed information, but TSA will not provide copies of detailed assessment reports without the End User's permission.

General Information	
Name	Demo Supplier
SAQ Verification Completed Date:	October 15, 2025

Performance Results

SAQ Verification Results:

62

Critical Risk	High Risk	Medium Risk	Low Risk
0-50	50-70	70-85	85-100

Non-Compliance Overview					
SAQ Category:	**Score**	**Critical**	**Major**	**Moderate**	**Minor**
Social Compliance	67		2	4	1
Health and Safety	57		4	5	1
Environmental	57			4	
Distribution	80			1	

Appendix E – Activity Fees for User-Pays model

<div align="right">8</div>

Fees will only be levied in circumstances where the user-pays model applies (per *Section 3.5*), and these fees will be invoiced in advance, so that if a user declines to pay, the activity will not proceed. Indicative fees are provided in the table below. Payment details are included in the General User Terms.

Inlight Platform Activities

<div align="right">8.1</div>

The Inlight platform fees for the Training Quiz, SAQ (Desktop Audit) and SAQ Verification steps are bundled into one fee, payable in advance of the first of these activities being assigned. CAP fees are payable only if this activity is required.

Pre-audit meetings

Each Site Inspection (Audit) will include a pre-audit meeting between the local auditor, the site and the Intertek scheduler in Australia (roughly 2 weeks prior to the audit). This meeting is important to ensure that the site understands how the audit will be conducted and what the requirements are, to ensure they have the best chance of success. The cost of the pre-audit meeting will be included in the quotation for the Site Inspection.

This meeting may not be required for renewing sites.

Site Inspection (Audit) Charges

Audit charges depend on the size of the site and its location.

A quotation for the Site Inspection (Audit) will be obtained by TSA and provided to the Requestor prior to the activity being scheduled, noting that pre-payment of this invoice is required for the Inspection to proceed. Pricing for the audit is affected by the number of employees on site and its location.

If a Corrective Action Plan (CAP) or other follow-up is required on completion of the audit, additional charges will apply.

Component	Description	Indicative Fee (USD)	Charging Method
Inlight Activity Bundle	Includes training quiz, desktop SAQ completion, and Intertek verification review.	$1,000 - $1,600	Flat fee per site, invoiced upfront.
Pre-Audit Meeting	Briefing call between Intertek auditor, local scheduler, and site to prepare for the audit.	$350 - $400	Included in Audit quotation.
Site Inspection (1-199 employees)	Estimated at 3 days total (2 days on site + 1 for prep/reporting). The average global rate is used to create a representative range. Including potential follow-up activities.	$5,500 - $12,000	Quoted in advance based on site and region.
Corrective Action Plan (CAP) Management	Review and coordination of corrective action responses post-audit, where gaps are identified. This activity is required only if major issues are found.	$500 - $700	Quoted if required.