



Reclay StewardEdge

Product Stewardship Solutions

October 14, 2024

To Whom It May Concern,

Thank you for the opportunity to provide input into the proposed changes to the Tires Regulation (O. Reg. 225/18) under the Resource Recovery and Circular Economy Act, 2016 (RRCEA).

Reclay StewardEdge (RSE) is a Canada-based international consultancy and operator of Producer Responsibility Organizations, such as the Canadian Beverage Container Recycling Association (Manitoba, Ontario as of 2022) and ReclayPRO (tire stewardship in Ontario) and in the past Multi-Material Stewardship Manitoba, Stewardship Ontario and Ontario Electronic Stewardship. RSE has over 25 years of experience in EPR and managing EPR programs. Furthermore, RSE is part of the Reclay Group, which operates PROs for packaging in Germany, France, Austria, Slovakia, Finland and Spain.

In our review of the document, we felt it important to raise a few points with you.

1. **Collection targets**

RSE welcomes the changes proposed, namely the amalgamation of the collection and processing targets into a single management target. The current collection target was unrealistic as there were not enough tires in the market to meet the objective. This will also help stabilize the relationship between PROs in the market who are working together to meet these targets.

Regarding the proposed new requirements on collection site, RSE is supportive of the registration requirement for each collection site, but recommends that PROs report on behalf of the collection sites they operate instead of imposing this reporting requirement on the collection site operators. This will help maintain simplicity and reduce red tape.

Furthermore, the proposed changes to a population-based formula for a collection network will lead to further operational efficiencies and service improvements for Ontarians and is therefore also supported by RSE. RSE had recommended this in the past.

2. **Small tire exemption changes**

This change may lead to a reduction of total tires being recycled in Ontario, since this will lead to small tires remaining in the collection stream without having been paid for by producers through EPR fees. RSE expects to lose some revenue and clients associated with these tires.

3. **Processing of tires - retreading**

RSE recommends maintaining retreading as a processing practice contributing to the tire processing rates. We understand that the Government of Ontario is not currently considering a changes in this area, but felt it important to highlight this for future discussions. Retreading is the most environmentally advantageous processing method for tires, and as such should be encouraged as



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much as possible. Retreading allows tires to remain in the economy without undergoing significant structural recycling and is thus the most circular and least energy intensive processing method. Furthermore, retreading requires the least amount of new rubber to be added to tires for them to be recycled into a new product. This protects Canadian and North American tire producers and prevents further market inroads made by lower quality Asian tires. The alternative, the importation of inferior and cheaper tires from Asia results in overall more rubber being placed into the market and environment. Retreading is an established hybrid of reuse and recycling and needs to be encouraged.

Overall, the proposed changes are positive in nature, and we expect the tire recycling framework in Ontario to be further stabilized. We would like to reiterate our support of your commitment to enhance and modernize Ontario's waste and recycling framework.

Regards,

Adrian Vannahme
Chief Operating Officer
Reclay StewardEdge