

May 1, 2026

Krista Friesen
Ministry of the Environment, Conservation and Parks
Resource Recovery Policy Branch
40 St. Clair Avenue West, 12th Floor
Toronto, Ontario
M4V 1M2

**Re: Environmental Registry of Ontario Proposal Number 026-0218
Proposed Amendments to Tires and Other Producer Responsibility Regulations**

Dear Krista:

The Canadian Federation of Independent Business (CFIB) is a not-for-profit, non-partisan organization representing the views of 40,000 small- and medium-sized businesses in all sectors across the province, including tire-related operations.

We welcome the opportunity to comment on the proposed changes to the Tires Regulation to ensure that tires are collected from small businesses and processed in a timely manner. It's clear from our affected members that changes are needed, since some have reached out to us about their tires not being picked up by Producer Responsibility Organizations (PRO)s.

Our members have raised the following four issues about lack of pickups resulting in stockpiled tires:

- Higher insurance premiums.
- Unfairness of paying a tax on every tire for a service that's not being received.
- Municipal bylaw enforcement officers and local fire departments threatening fines because stockpiled tires create major health and safety concerns (i.e., fire hazards and breeding grounds for disease-carrying mosquitos).
- Tires ending up in landfills, defeating the purpose of any tire recycling program.

Here's an example of what one of our members told us: *"Are small and large shop owners expected to incur the liabilities, risks and expenses associated with long-term storage of used tires? I am hoping you will be able to reach out to some of the players and make this issue front and centre.*

We cannot afford the increase in insurance premiums that will ensue, nor do we have the capacity to accommodate long-term storage of used tires.

We pay the manufacturers/importers a tax on every single tire we purchase. That tax is supposed to cover the removal and recycling of used tires. Why should we continue to pay a tax on a service we are no longer receiving?"

On behalf of our affected members, we're in favour of PROs being required to collect tires from any site that requests pickup. However, our members don't all agree that mandatory pickups should be based on a tire minimum.

Some CFIB members acknowledged that the Ministry's proposed 50-tire minimum is "reasonable" or "workable". Others said they would be comfortable with 75 or 100 tires as the minimum, if it results in cost efficiencies.

On the other hand, several members told us that the Ministry should "prioritize safety" by using a business's "safe storage capacity rather than a fixed tire number" as the trigger for mandatory pickups.

When all is said and done, there should be an accessible and cost-effective method for small businesses across Ontario to have their tires collected, regardless of the quantity or available storage space.

We support the Ministry's proposal to also add a guaranteed response time for pickups. However, we would like to know how the government arrived at the guaranteed response times of one month during peak tire change periods (i.e., October-December and April-May) and two months the rest of the year. Some CFIB members advised us that the Ministry should provide options for scheduled or routine pickups, such as "weekly or biweekly service".

Our affected members pay per tire for collection *and* recycling. They also want tires kept out of landfills, including those not needed to meet management targets. That's why it makes sense for collected tires to be processed in a timely manner. What evidence did the government use to recommend "within three months of being collected from a site" as the appropriate processing time limit?

Since many small businesses are struggling with low demand, ever-rising costs, and tariff impacts, they can't afford to pay any alternative tire collection costs. According to CFIB's most recent Business Barometer® data, April 2026 marked the 32nd consecutive month that Ontario small businesses rated insufficient demand as the top barrier to their sales or growth. When people aren't

buying enough of their products or services, our members can't get ahead of the increasing costs of doing business.

Thank you again for the opportunity to share our members' views on used tire collection and processing.

Sincerely,

Original signed by

Julie Kwiecinski
Director of Provincial Affairs, Ontario

cc: Hon. Todd McCarthy, Minister of the Environment, Conservation and Parks
Hon. Nina Tangri, Associate Minister of Small Business