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Lisa Kingsmore
Senior Policy Analyst
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Resource Recover Policy Branch
40 St. Clair Avenue West
Floor 8
Toronto, Ontario
M4V1M2

Dear Lisa Kingsmore,

EBR 013-1716: Tire Regulation under the Resource Recovery and Circular Economy Act, 2016

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The eradication of the Ontario Tire Stewardship (OTS) program will drastically change how tires are recycled in Ontario. This change will move the recycling of tires from the responsibility of the consumer and the Ontario Tire Stewardship program, to manufactures, producers and marketers of tires in Ontario. It is the CFFO's recommendation that government monitor tire prices to ensure this new system does not cost consumers even more than the previous system. The current system already imposes a significant fee on consumers, especially for large tires. Manufactures of large tires should be responsible for implementing cost-effective recycling programs to reduce burden on the consumer.

Tire Fees:

Under the previous Ontario Tire Stewardship board control, tires were sold with a stewardship fee based on the size and weight of the tire. The fee increased with the weight of the tires. This meant that those who use tires for heavy machinery had to pay significant amounts compared to those who only need lightweight tires. Therefore, farmers were burdened every time they had to purchase equipment or new tires.

Under the new regulation, manufacturers of large tires will be responsible for recycling. The CFFO recommends that this be done cautiously, as requiring manufacturers to implement recycling programs could ultimately lead to tires becoming more expensive for the consumer. The recycling responsibilities should be placed on the producer

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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companies who market and sell tires to consumers. If a business or company is inputting tires into the market, then they should be responsible for taking the tires out by recycling. Additionally, uses of recycled tires should be expanded to include the potential of using old tires to manufacture new tires.

It is the hope of the CFFO that the eradication of the OTS will lead to reduced tire stewardship fees, as producers will be paying less without being a part of the OTS program, opening greater opportunities for other tire recycling methods and market opportunities.

Tire Recycling and Collection:

Under the new regulation, tire producers, marketers and retailers will be required to collect back a portion of the tires they have sold over the course of a set time frame. The previous time frame was over the course of three years, and the new time frame is not yet set. The CFFO recommends that the new leadership continues to use three years as the time frame for assessing the number of tires that must be collected.

Those who sell tires in Ontario will be required to collect back a portion of their tires with at least 60% of their collection coming from heavy tires. Requiring large tire manufactures to have at least 60% of their tire collection from large tires will mean that farmers will have equal opportunity to recycle their tires because producers will be aiming to collect a large amount of that tire type. Since there are large stewardship fees attached to agricultural tires, they should be collected as easily as possible with little burden on the consumer of the tire.

Collection Sites:

A GIS analysis should be completed for all new collection sites to ensure they are not being placed on Class 1-4 farmland or environmentally significant areas. Brownfields would provide an excellent choice for collection sites.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario
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