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Tire Stewardship Plan

2012 to 2016

for:

Passenger and Light Truck tires (PLT)

Medium Truck tires (MT)

Agricultural tires (AG)

Logger Skidder tires (LS)

A. Regulatory Basis for this Plan

This stewardship plan (Plan) for the period 2012 to 2016 is filed by Tire Stewardship BC Association (TSBC) with the Ministry of Environment (Ministry) pursuant to the requirements of the Recycling Regulation B.C. Reg. 449/2004 (the "Regulation") for the tire product category identified in Schedule 4 of the Regulation as currently in effect. For the purposes of this Plan, these tires are referred to as "*regulated*" and are described in detail in Section I of APPENDIX I – Schedule A: Tire Definitions, Advance Disposal Fees (ADF) and Interest Schedule. The tire types currently regulated are commonly referred to as Passenger and Light Truck tires (PLT), Medium Truck tires (MT), Agricultural tires (AG) and Logger Skidder tires (LS).

This Plan describes the current program for regulated tires and the priorities for the next 5 year period in the context of the approval criteria set forth in the Regulation.

In addition to the currently regulated tires, this plan also mentions Off the Road tires (OTR). These tires are explicitly excluded in Schedule 4, Section 2 (d) of the Regulation. For the purposes of this Plan, these tires are referred to as "*unregulated*" and are also described in more detail in Section II e) of APPENDIX I – Schedule A: Tire Definitions, Advance Disposal Fees (ADF) and Interest Schedule.

In the Ministry's letter to TSBC of December 20, 2010, TSBC was instructed to include the results of recent research on the recycling of OTRs in this Plan and to "establish clear commitments in relation to OTR stewardship in the future." While TSBC's OTR research remains a work in progress, the status of research completed to date is summarized in Section 1 Program Structure – *Unregulated Tires*.

B. Overview of Existing Program

Tire Stewardship BC Association (TSBC) is the provincial not-for-profit society responsible for operating BC's scrap tire recycling program in accordance with its Ministry of Environment approved Tire Stewardship Plan and the BC Recycling Regulation.

Since January 1, 2007 TSBC has been accountable to its stakeholders and the public for the collection, processing and environmentally sound disposal of all currently regulated tires.

The society is governed by a Board, comprised of seven directors representing the four member organizations:

- The Retail Council of Canada
- Western Canada Tire Dealers Association
- The Rubber Association of Canada
- New Car Dealers Association of BC

TSBC collects an Advance Disposal Fee (commonly referred to as an eco fee) from registered retailers on the sale of every new tire (replacement tires as well as tires on new vehicles). These fees are used to pay for transporting and recycling BC's scrap tires in environmentally responsible ways instead of ending up in landfills. None of the eco fees collected go to government. All of the money is used in the operation and enhancement of the tire recycling program in BC.

A more complete description of the current program can be found on TSBC's website http://tsbc.ca/ and in the 2009 Annual Report http://tsbc.ca/pdf/TSBC-AnnualReport2009.pdf.

TSBC has recorded many significant accomplishments since "industry got behind the wheel":

- Transitioned the tire recycling program from government to industry smoothly and without incident.
- Eliminated tipping fees charged by some haulers and processors for collection and disposal resulting in the removal of any incentive for illegal dumping.
- Diverted virtually 100% of the regulated scrap tires available for collection.
- Launched the Return to Retailer Program (R2R) to provide even more options for consumers to dispose of their orphan tires and to reduce costs at taxpayer funded landfills.
- Implemented a compliance process to ensure all retailers "pay their fair share" by correctly reporting and remitting eco fees on all new tires sold in BC.
- Extended the eco fee collection system to include the eco fees due on tires on vehicles imported from the United States.
- Initiated a Manufacturer Incentive Program to encourage the use of BC recycled rubber by BC manufacturing companies.
- Introduced the Community Grant Program to support communities in their use of BC recycled rubber in projects such as playgrounds and other recreational facilities.
- Completed a baseline study of greenhouse gas (GHG) emissions from BC's recycling operations. The findings suggest that for every tonne of carbon dioxide equivalent (CO_2e) emitted by recycling operations, five tonnes are diverted.
- Conducted research on the sources and volumes of Off the Road (OTR) tires used in BC, from small industrial tires to the giant haul truck tires used in BC's open pit mines. This essential research is being used as the basis for determining the economic and environmental feasibility of incorporating OTRs into the program.
- Introduced a voluntary province-wide program to recycle bicycle tires and tubes.

Going forward, TSBC has established its vision, mission and goals which guide the development of this Plan.

VISION

All scrap tires are transformed to the environmental, economic, and social benefit of BC's citizens

MISSION

To administer a sustainable Extended Producer Responsibility program for the stewardship of all BC's scrap tires designated under the BC Recycling Regulation.

GOALS

- *To support the environmentally friendly and sustainable collection and recycling of 100% of regulated tires available for collection.*
- *To sustain or reduce the "average" Advance Disposal Fee.*
- *To maintain TSBC's financial stability.*
- *To foster and support innovation and research relative to higher valued solutions within the industry.*
- *To assist the industry in building sustainable markets for recycled rubber products.*
- *To support community projects that use BC recycled rubber.*
- *To support the pollution prevention hierarchy as referenced in the BC Recycling Regulation.*
- *To provide public education on the benefits of proper maintenance and inflation of tires to extend tire life thereby avoiding scrap tires entering the waste stream.*

1. Program Structure [Section 5 (1) (c) (i)]

The plan adequately provides for the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously sold, offered for sale or distributed in British Columbia.

Regulated Tires

For every new tire sold, TSBC registered retailers remit an Advance Disposal Fee (ADF), commonly referred to as an eco fee, to TSBC.

The ADFs are set by TSBC on Passenger & Light Truck Tire (PLT), Medium Truck Tire (MT), Agricultural Tire (AG), Logger / Skidder Tire (LS). The fees vary by tire type to compensate for the higher costs of collecting and disposing of larger tires and the fee rates are listed on TSBC's website. Other Off-The-Road (OTR) tires have been excluded from the Recycling Regulation and the stewardship program because there is no viable recycling solution for these larger tires.

All the eco fees collected go towards the operation of the scrap tire program. For example:

- Financial incentives are paid to BC processors for the transportation and processing of the scrap tires and to BC manufacturers to use BC crumb rubber in their consumer products.
- Grants are paid to support communities building or renovating eligible recreational facilities using BC recycled rubber.

To ensure everyone pays their fair share of the cost to recycle these tires at their end of life, TSBC has a compliance program to check that all eco fees due to TSBC have been remitted.

2012 to 2016

TSBC will maintain the existing operational structure.

Unregulated Tires

Except for AG and LS tires noted above, other Off the Road (OTR) tires are excluded from the Recycling Regulation because there is currently no viable recycling solution in BC for these larger tires. However, TSBC is committed to researching the feasibility of establishing an OTR recycling solution for BC in its current Stewardship Plan. Research began in earnest in 2010 in partnership with the Canadian Association of Tire Recycling Agencies. In 2011 the research re-focused on BC's specific requirements and it is anticipated this essential research will continue

through 2011 and into 2012.

The key research findings are summarized below:

- **What are the problems / opportunities?** At the moment, there appears to be no consensus on the nature and extent of the problems caused by scrap OTRs. While scrap OTR tires pose similar health and environmental issues inherent in regulated tires (e.g. breeding ground for pests, fire hazard), OTRs tend to be somewhat removed from the urban environments, posing potentially lower risks. On the other hand, OTR tires contain significant quantities of rubber and steel. The more compelling opportunity to protect the environment may be to recover the valuable resources they contain thereby conserving natural resources and avoiding the energy costs and related greenhouse gas (GHG) emissions associated with harvesting virgin natural resources.

- **How big are the problems / opportunities?** Approximately 10,000 tonnes of OTRs are generated annually in BC (roughly equivalent to 25% of the tonnage of regulated tires)
    - About 85% of the tonnage is from the giant tires (>39" rim size) each weighing up to several tonnes. These tires are used on the huge open-pit haul trucks and require "giant" sized equipment to handle, transport, and process.
    - Approximately 70% of the 10,000 tonnes is generated in the southern regions of the province where the concentration of high production open pit mines is greatest. This information may be useful in situating a processing facility to minimize the costs to transport the scrap tires and ultimately, the recycled rubber products produced.

- **Can OTRs be recycled and at what cost?** Due to their size, weight and the quantity of steel they contain, giant OTRs are reported to be significantly more costly to handle, transport and process than regulated tires. While some companies outside BC are able to recycle small volumes of the giant OTRs, TSBC has concluded that no company is currently recycling anywhere near the number of giant OTRs that BC generates. A processing facility with the capability and capacity to handle all of BC's scrap OTRs would be unique and precedent setting, and its economic viability is yet to be established.

There is considerably more information and analysis required before the research can be completed and before any evidenced based recommendations can be made. TSBC is committed to working closely with key stakeholders, including the mining industry, to complete the research as soon as possible. TSBC has targeted completion of the report, with recommendations, for delivery to the Ministry of Environment in 2012.

2. Consumer Access to Collection Facilities [Section 5 (1)(c)(iii)]

The plan adequately provides for reasonable and free consumer access to collection facilities.

Unlike other product recycling programs where consumers must choose between putting their end of life product into the waste stream or taking it to a collection depot for recycling, most motorists exchange their old tires for new ones at the time of purchase. Retailers take back one old tire for every new tire sold and arrange for haulers to collect and transport the tires to processors.

Some motorists choose to take their old tires home rather than leave them with the retailer for disposal. Many of these orphan tires end up at a landfill where they are held for collection by haulers. Recognizing that this is a cost and logistical problem for some landfills, TSBC provides alternative disposal options to reduce this burden:

- The Return to Retailer (R2R) program provides consumers a free option to return these orphan tires to participating retailers. This is a year round program for consumers to drop off up to four passenger or light truck tires, clean and off rim during the retailer's business hours (http://www.tirestewardshipbc.ca/pickupdropoff.php).
- Since 2009 TSBC has piloted eight tire round-ups as another convenient option for disposing of orphan tires as well as tires on rims. Tires on rims are a significant cost and inconvenience issue for many consumers.
- TSBC has plans in place for several more round ups in 2011, in partnership with retailers and Regional Districts. As a pilot, some of the 2011 events will be conducted jointly with other stewardship agencies including Electronic Stewardship Association of BC, Product Care, and BC Used Oil Management Association. These events will be widely promoted to make it more convenient and efficient for consumers to dispose of their recyclables. They also provide another opportunity to inform the public on what happens to the eco fees they pay and what happens to the products they discard.

The common measure of effectiveness in stewardship programs is the “recovery rate”, the actual number of scrap tires collected divided by the actual number of new tires sold. In the four years of operation since 2007, TSBC’s recovery rate by this definition has been 87%. It is actually higher when some other factors are taken into account. For example, there is a significant market outside BC for partially worn tires that are not yet at their end of life. These tires are “culled” and shipped off-shore for reuse, never to return as scrap and therefore not available for collection in BC. Further, as the total number of vehicle registrations continues to increase, and with the greater use of snow tires, there is an ever increasing number of tires “in use” or “in storage and ready for use” further reducing the number of tires available for collection.

However the critical measure for TSBC is the collection rate, the tonnes collected divided by the tonnes available for collection. The collection and transportation of scrap tires from source locations throughout BC to processors is well established, efficient and effective. In the four years of operation since January 2007, virtually 100% of the scrap tires available for collection at retailers or scrap tire generators (e.g. landfills and auto wreckers) were collected for recycling or reuse. Collection complaints from retailers, generators and consumers are extremely rare, demonstrating the effectiveness of the collection system in place.

2012 to 2016

TSBC will:

- Monitor distribution of R2R retailers throughout the province to demonstrate the extent to which each region is being served and continue to recruit new retailers where needed into the Return to Retailer program.
- Continue to conduct Tire Round-ups in regions according to need (e.g. sparsely populated regions or where tires are banned from landfills) as identified in collaboration with key stakeholders.
- Track and report the recovery rate and explain the variance between the volumes collected versus volumes sold, and any significant variances in the trend.

3. Consumer Awareness [Section 5 (1) (c) (iv)]

The plan adequately provides for making consumers aware of the producer's product stewardship program, the location of collection facilities, and how to manage products in a safe manner.

TSBC uses a variety of methods to raise consumer awareness of our program: TSBC website; information brochures at the point of sale; information available through the Recycling Council of BC (RCBC) Recycling Hotline; and media attention from special events. TSBC also conducts an annual education and communications campaign to encourage proper tire inflation and maintenance to save fuel; reduce emissions and improve safety; and to create awareness of the environmental and economic benefits of tire recycling in BC. A related focus is the BuyBlackGoGreen message that explains that buying recycled rubber from BC for projects makes good economic and environmental sense. Similarly, TSBC's Community Grant Program supports the use of BC recycled rubber in community projects such as playgrounds and other recreation facilities that are wheelchair and publicly accessible.

TSBC also works with other stewardship agencies and the Recycling Council of BC in joint initiatives to improve overall public awareness and interest in recycling. Initiatives include:

- BC Stewards.com – a common website for information about BC's stewardship programs.
- Recycling Handbook – a common brochure that describes all BC's stewardship programs.
- Recyclepedia – an enhanced web tool residing on the RCBC website for consumers wanting to know where to recycle certain materials.

As previously noted, the scrap tire collection system is not depot based like many other recycled products. In BC there are over 2,100 retailers that take back (i.e. collect) consumers' scrap tires when new tires are purchased. The Return to Retailer program and tire round up events supplement the collection of orphan tires. The net result is that virtually 100% of scrap tires available for collection are collected and processed in BC.

2012 to 2016

TSBC will:

- Continue to work with key stakeholders, including other stewardship agencies and the Recycling Council of BC in joint initiatives, to improve overall public awareness and interest in recycling.
- Through initiatives such BuyBlackGoGreen, community grants and tire round-up events, continue to promote the economic, environmental and social benefits of recycling tires.

4. Management of Program Costs [Section 5 (1) (c) (v)]

The plan adequately provides for assessing the performance of the producer's product stewardship program and the management of costs incurred by the program

TSBC's financial statements are audited annually and published on its website as part of its annual report to the Ministry. TSBC's non-financial information (e.g. number of collection sites; numbers of tonnes collected and tonnes recycled etc) was reviewed by Chartered Accounting firms for 2008 and 2010 and will be reviewed annually in the future.

2012 to 2016

TSBC will:

- Continue to manage program costs to the economic, social and environmental benefit of BC's citizens.
- Maintain TSBC's financial stability while fostering and supporting innovation and research.
- Assist the industry in building sustainable markets for recycled rubber products.
- Support community projects that use BC recycled rubber.
- Continue to provide public education on the benefits of proper maintenance and inflation of tires to extend their life.

5. Management of Environmental Impacts [Section 5 (1) (c) (v)]

The plan adequately provides for assessing the management of environmental impacts of the program.

There are many environmental benefits from diverting tires from landfills and from the environment in general: reduced fire hazard and the potential for air, water and land pollution; fewer breeding habitats for West Nile Virus-carrying mosquitoes; and the recovery of rubber and steel that are very energy intensive materials to obtain raw, and consequently major contributors of greenhouse gases.

Recent studies have shown the net effect of tire recycling on greenhouse gas (GHG) emissions to be positive. In 2009 a baseline inventory of GHG emissions commissioned by TSBC for BC's 2008 tire recycling operations was completed. The report concluded that a total of 27,196 tonnes of carbon dioxide equivalents (CO_2e) were emitted as a result of transporting and processing 40,000 tonnes of scrap tires and shipping the recycled rubber to market:

- 90.5 % of the emissions occurred as a result of processing the scrap tires.
- 5.2 % were due to transporting the scrap tires.
- 4.3 % of emissions were from shipping the recycled rubber to market.

These numbers tell only part of the story. As the study did not include the more complex analysis of the GHGs emission avoided from the extraction of virgin materials, we looked to other studies for evidence. A recent analysis[1] in the US by the Institute of Scrap Recycling Industries (ISRI) suggests that recycling four tires saves the energy equivalent of 18 gallons of gasoline and reduces the greenhouse gas emissions by 323 pounds of CO_2e. Translated for BC, recycling 40,000 tonnes (equivalent to 4 million passenger tires) of scrap tires would reduce GHG emissions by over 146,500 tonnes. These findings suggest that for every tonne of CO_2e emitted by tire recycling operations, 5 tonnes are avoided in the resource extraction process.

2012 to 2016

Tire Stewardship BC will:

- Continue to look for other studies to refine the analysis of GHGs avoided by BC's tire recycling program.
- Monitor changes to systems for collecting, transporting and processing tires for any potentially significant improvements to environmental performance.
- Update the GHG baseline inventory.

[1] http://www.marketwire.com/press-release/Scrap-Recycling-Provides-Positive-Opportunities-for-the-Environment-1164263.htm

6. Tire Management per Pollution Prevention Hierarchy [Section 5(1)(c)(viii)]

The plan adequately provides for the management of the product in adherence to the order of preference in the pollution prevention hierarchy.

Tire Stewardship BC endeavors to manage collected products in accordance with the "pollution prevention hierarchy", i.e. reuse (2R) before recycle (3R) before energy recovery (4R) before residual disposal (5R). TSBC incents the processing of scrap tires into higher value added products through providing higher financial incentives to recycle a tire versus burning a tire for energy recovery. Beyond primary processing, TSBC promotes the use of BC's recycled rubber in products manufactured in BC through a Manufacturing Incentive.

TSBC tracks the annual ratio of 3R to 4R as has been the Ministry's practice since 1991. From 2007 to 2010 the average split by weight is as follows:

- Recycle (3R) - 69% of the tires were recycled into tire derived products (TDP) primarily crumb rubber, granules of rubber with the steel and fiber removed. Crumb is then used to create a variety of products including athletic tracks, synthetic turf fields; landscaping mulch and playgrounds; colourful, resilient flooring in recreational facilities; flooring and mats for agricultural and industrial use; and asphalt rubber. The steel is recycled and the fiber is used in a cement kiln as fuel.

- Energy Recovery (4R) - 31% of the tires were used as tire derived fuel (TDF) to recover the energy.

TSBC has maintained the Ministry program stability strategy by supporting both TDP and TDF markets. Year to year fluctuations in these percentages is largely a reflection of ever-shifting markets for TDP and TDF.

2012 to 2016

TSBC will:

- Find a recycling solution to reduce the tonnage of materials going to landfill (5R) such as Agricultural tires and Logger Skidder tires that currently do not meet the specifications (off-spec tires) for cost-efficient processing into TDP or TDF.
- Estimate the volume of tires collected, culled, and sent to reuse markets (2R) outside BC.
- Report the actual volume of processing waste and off-spec tires being landfilled (5R).

7. Product Life Cycle Management [[Section 5 (1) (c) (vii)]

The plan adequately provides for eliminating or reducing the environmental impacts of a product throughout the product's life cycle.

Recycling tires at their end of life is important but lengthening their life so that fewer are used is essential. Tire manufacturers are making progress: since 1981 the average tire life has gone up 53 % (from 46,000 km to over 72,000 km). Also, average tire rolling resistance has decreased by more than 25 %, simply by making the tires lighter and stronger. Manufacturers also recognize the need to balance environmental concerns with tire safety and customer satisfaction. TSBC works in partnership with The Rubber Association of Canada and Natural Resources Canada in their annual Be Tire Smart Campaign which focuses on educating the motoring public of the benefits of proper tire inflation and maintenance.

2012 to 2016

TSBC will:

- Continue to work with The Rubber Association of Canada and Natural Resources Canada in supporting the "Be Tire Smart – Play Your PART" campaign. "Be Tire Smart – Play Your PART" is a national public education campaign designed to encourage Canadian motorists to adopt good tire maintenance practices to increase vehicle fuel efficiency, reduce harmful emissions, save money and make vehicles safe.

8. Dispute Resolution [[Section 5 (1) (c) (vi)]

The plan adequately provides for a dispute resolution procedure for disputes that arise between a producer and person providing services related to the collection and management of the product during implementation of the plan or operation of the product stewardship program.

TSBC's strategy has been to avoid disputes and our success has been achieved by taking a partnership approach with our service providers. This entails:

- Having written contracts with all participants who receive financial incentives from TSBC.
- Managing key contracts with regular and frequent partnership relationship meetings to keep communication and trust levels high.
- Tracking and monitoring tire collection complaints from retailers and generators.

There have been no disputes since TSBC implemented the program but in the event of a dispute, normal commercial legal procedures would be applied.

2012 to 2016

TSBC will:

- Continue to manage relationships with service providers.

9. Stakeholder Consultation on Plan Implementation and Operation [Section 5 (1) (b)]

> The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the product stewardship program.

Public consultation for this Plan was done jointly with three other stewardship associations: Product Care Association (PCA); Electronics Stewardship Association of BC (ESABC); and Post Consumer Pharmaceutical Stewardship Association (PCPSA). Refer to the summary consultation report in Appendix II.

TSBC meets with its Advisory Committee semi-annually or otherwise as required. The Advisory Committee, comprised of representatives from the retailers, scrap tire generators, haulers, processors, manufacturers, Recycling Council of BC and local government, provides advice to TSBC on program policy and operational issues.

TSBC consulted with the Advisory Committee separately from the public and their input is included in the summary report.

10. Performance Measures and Targets [Section 5 (1) (a) (i), (ii), (iii)]

The plan will achieve, or is capable of achieving within a reasonable time:
- a 75% recovery rate or another recovery rate established by the director;
- any performance requirements or targets established by the director; and
- any performance requirements or targets in the plan.

Performance Measures		Targets
Operational		
1	Total tonnes collected for BC broken down by Regional District	For information only
2	Rolling Average 4 year **Recovery** rate (Actual # units collected / # units sold)	~87%
3	**Collection** rate (tonnes collected/tonnes available for collection)	~100%
4	Percentage of tonnes diverted to: Reuse (2R); Tire Derived Product (3R); Tire Derived Fuel (4R); Waste to Landfill (5R)	2R, 3R, 4R for information only; 5R target of under 7%
Accessibility		
5	Number of collection sites (# registered retailers)	For information only
6	Percentage of retailers that take back one scrap tire for every new replacement tire sold	~100%
7	Total number of retailers that take back orphan tires (R2R)	400
8	Number of collection events per year (the process to select sites is TBD)	15
Stakeholder Engagement & Satisfaction		
9	Number of legitimate collection complaints per year from retailers, generators	Less than 12
10	Number of program complaints per year from consumers	Less than 12
Financial		
11	Program cost per Passenger Tire Equivalent - $/PTE	Under $5/PTE
12	Percentage of total revenue used to collect, transport and process scrap tires	77%
13	Stabilization Reserves on hand to ensure program stability	No less than 6 months operational costs
Environmental		
14	GHG Emissions Baseline Report update	One update over the 5 year PLan
Product Life-Cycle Management		
15	Recyclability rate (# units recyclable / # units sold)	~ 100%

APPENDIX I

Schedule A: *Tire Definitions, Advance Disposal Fees (ADF) and Interest Schedule*

SCHEDULE A

Tire Stewardship B.C.

Tire Definitions, Advance Disposal Fees (ADF) and Interest Schedule

SECTION I: TIRE PRODUCT CATEGORIES INCLUDED (ADF applicable)

Tire Type	ADF	Definition
Passenger Tires, Small RV Tires and Light Truck Tires	**$5.00 +** **HST**	Passenger tires are designed for use on passenger cars, light trucks, small recreational vehicles(RVs) and multipurpose passenger vehicles (MPVs), including sport utility vehicles (SUVs) and crossover utility vehicles (CUV's), and to comply with Canadian Motor Vehicle Safety Standard (CMVSS No. 109). The light truck tire category is tires designed for use on consumer or commercial light trucks, under 10,000 lbs. Gross Vehicle Weight, and comply with Canadian Motor Vehicle Safety Standard (CMVSS No. 119). Codes found on the sidewall of light passenger and light truck tires are P (Passenger) and LT (Light Truck). Temporary spare tires are marked T (Temporary).
Motorcycle, Golf Cart and All Terrain Vehicle Tires	**$5.00 +** **HST**	Includes all tires specifically designed for on/off highway motorcycles, motorcycle sidecars, motor bikes, mopeds, mini-cycles, golf carts and all terrain vehicles.
Forklift, Small Utility and RV Trailer Tires, Bobcat/Skid Steer Tires	**$5.00 +** **HST**	Includes pneumatic forklift tires, Bobcat/Skid Steer tires measuring 16” and under, as well as RV (Recreational Trailer) and utility trailer, tires marked ST (Special, Trailer).
Agricultural Tires (Small)	**$5.00 +** **HST**	Includes drive and free rolling farm and implement tires up to 16” deemed for use on farm equipment.
Medium Truck Tires	**$9.00 +** **HST**	Also commonly known as Commercial Truck Tires – Truck and Bus tires including Wide Base or Heavy Truck tires designed for truck/bus applications and Larger RV (Recreational Vehicle) tires not marked "P or LT”.(Passenger or Light Truck) All of which comply with Canadian Motor Vehicle Safety Standard (CMVSS No. 119).

Agricultural Drive Tires (Medium)	**$15.00 +** **HST**	Includes drive wheel tires used on tractors and combine equipment. These tires are normally identified with a sidewall marking with suffix letters R (Radial Ply) or HF (High Flotation) and are 16.5" – 25.5". These tires are listed in The Tire and Rim Association Inc. annual yearbook Section 5 Agricultural.
Forklift, Bobcat/Skid Steer Tires	**$15.00 +** **HST**	Includes pneumatic forklift tires, Bobcat/Skid Steer Tires measuring 16.5" and over.
Logger/Skidder Tires, Agricultural Drive Tires (Large)	**$35.00 +** **HST**	Tires used on tree harvesting equipment and normally identified with a sidewall marking with suffix letters LS.(Logger/Skidder) These tires are listed in The Tire and Rim Association Inc. annual yearbook Section 5 Agricultural. This section would also include Agriculture Drive Tires measuring 26" and up.

For the purpose of determining eligible tire sizes within the tire type category, TSBC will deem the following reference material as the reference authority - 2005 Tire and Rim Handbook of the Tire & Rim Association of the United States as amended from time to time.

SECTION II: TIRE PRODUCT CATEGORIES <u>EXCLUDED</u> (ADF not applicable)

The Recycling Regulation specifically excludes certain types of tires including

a) tires designed for use on cycles, wheelchairs or three-wheeled motorized devices designed for the transportation of persons with physical impairment;
b) tires designed for use on an aircraft or wheelbarrow;
c) tires that ordinarily have a retail value of less than $30;
d) recapped and retreaded tires; and
e) tires designated with a tread code of C,E,G,L, IND in the 2005 Tire and Rim Handbook of the Tire and Rim Association of the United States, as amended from time to time."

TSBC Explanatory Note: Tires with tread code C (Compactor), E (Earthmoving), G (Grader), L (Loader), IND (Industrial) or NHS (Not for Highway Service) are generally referred to as Grader/Loader or Small-Off-The-Road or Large-Off-The-Road tires. A further distinction for clarity purposes is as follows:

Small Off-the-Road (Industrial Equipment) Tires
Tires of truck type construction for off road applications without DOT approval. Conventional sizes smaller than 16.00" cross section and wide base sizes smaller than 20.5" cross section. These tires are listed in The Tire and Rim Association Inc. annual yearbook Section 4 Off-the-Road.

Large Off-the-Road Tires
Tires of truck type construction for off road applications without DOT approval. Conventional sizes 16.00" and larger cross section, and wide base sizes of 20.5" and larger cross section.

These tires are listed in The Tire and Rim Association Inc. annual yearbook Section 4 Off-the-Road.

Industrial Tires
Industrial tires identified with a sidewall marking of “IND” (Industrial), “NHS” (Not for Highway Service) Solid and Press-On tires (commonly found on forklifts) These tires are listed in The Tire and Rim Association Inc. annual yearbook Section 6, Industrial. This does not apply to bobcat/skid steer tires.

SECTION III: INTEREST

Interest charges will be applied at a rate of 1% per month (12.6825% annually) compounded monthly and calculated from the date the interest became payable.

APPENDIX II

Summary Consultation Report - TBD