



**DRAFT**  
**Tire**  
**Stewardship**  
**Plan**

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## **A. Regulatory Basis for this Plan**

This Stewardship Plan (Plan) 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 (Regulation), for the tire product category identified in Schedule 4 of the Regulation as currently in effect.

For purposes of this Plan, the tires covered in Schedule 4 are referred to as “*regulated*” and are described in detail in Section I of [Appendix I](#), Tire Definitions. The tire types currently regulated are commonly referred to as Passenger and Light Truck (PLT) tires, Medium Truck (MT) tires, Agricultural (AG) tires and Logger Skidder (LS) tires.

This Plan describes the current program for regulated tires in the context of the approval criteria set forth in the Regulation. The Plan is expected to remain applicable for the foreseeable term.

Some Off-the-Road (OTR) tire types are explicitly excluded under Schedule 4, Section 2 (d) of the Regulation. These “*unregulated*” tires are also described in more detail in [Appendix I](#), under Section II e).

## **B. Appointment of an Agency**

Established under the BC Society Act, and operating under the new British Columbia Societies Act, TSBC is the provincial not-for-profit society responsible for operating BC’s scrap tire recycling program in accordance with its Ministry-approved Tire Stewardship Plan and the Regulation.

Since January 1, 2007, TSBC has been accountable to the retailers, other stakeholders and the public for the collection, processing and environmentally sound disposal of all currently regulated tires. TSBC will continue to be the stewardship agency on behalf of each registered retailer (producer) in the province and will comply with Part 2 of the Regulation with respect to the duties referred to in paragraph (a).

For the purpose of the tire program, the BC Recycling Regulation defines a producer as a person who

- i. sells, offers for sale or distributes a new tire product in British Columbia,
- ii. is the owner or licensee of a trademark under which a tire product is sold or distributed in British Columbia, whether or not the trademark is registered, or
- iii. imports the tire product into British Columbia for sale or distribution.

The current list of retailers (producers) represented by TSBC is available at <http://tsbc.ca/pdf/registeredretailers.pdf>

The society is governed by a Board comprised of [seven directors](#) representing the four member organizations:

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

TSBC also consults with its Advisory Committee comprising representatives from the Recycling Council of BC (Chair), retailers, scrap tire generators, haulers, processors, manufacturers, and local government. The committee meets at least annually or as needed to provide advice on program policy and operations. This forum is considered essential to the ongoing success of the program and will be maintained. The [current membership](#) is posted on the TSBC website.

Any changes to TSBC's structure and governance will be reported to the Ministry of Environment.

To guide the development of this Plan, TSBC has established its vision, mission, and goals, as amended from time to time.

#### **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 scrap tires designated under the BC Recycling Regulation.*

#### **GOALS**

- *To support the environmentally friendly and sustainable collection and management of 100% of regulated scrap 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 maintenance and inflation of tires to extend tire life, thereby delaying their entry to the waste stream.*

## C. Plan Components

### 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 used in a commercial enterprise, sold, offered for sale or distributed in British Columbia.*

TSBC collects an Advance Disposal Fee (ADF), commonly referred to as an eco-fee, from registered retailers on the sale of every new tire including replacement tires and tires on new vehicles. ADFs are set by TSBC on PLT, MT, AG and LS tires. The fee rates, listed on the TSBC website, vary by tire type to compensate for the higher costs of collecting and disposing of larger tires. Details of the tire types are provided in [Appendix I – Tire Definitions](#).

These fees are used in the operation of the tire recycling program in BC with none of the eco-fees collected directed to government. While the majority of funds (currently 92%) are incentives paid to transport and recycle BC's scrap tires in environmentally responsible ways, TSBC also directs funds to other activities that enhance BC's tire recycling program and help TSBC meet its goals:

- A Manufacturer Incentive Program to stimulate the use of BC recycled rubber by BC manufacturing companies. This program has created a strong and stable market for BC recycled products.
- A [Community Grant Program](#) to support communities in their use of BC recycled rubber in projects such as playgrounds and other recreational facilities.
- A voluntary province-wide [program to recycle bicycle tires and tubes](#). The program piggybacks on the existing automobile scrap tire and collection infrastructure. There is neither an eco-fee to the consumer nor a disposal fee charged to bicycle shops.
- 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.
- A Research and Development program to find value-added [solutions to tire fibre](#).

Now that both the capability and capacity to process non-program OTR tires up to 39” exists in BC, TSBC has been researching projected volumes and costs to determine the eco-fees required for these tires. Early indications show significant support from affected stakeholders to add these tires to the BC Recycling Regulation.

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

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

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. The majority of retailers take back one old tire for every new tire sold and arrange for haulers to collect and transport the tires to processors.

Not all tire retailers are in a position to take back a scrap tire for every new tire sold. An example is Home Depot, which may sell a trailer with new tires even though their primary business is not selling tires or equipment with new tires. TSBC therefore defines a collection facility as “a TSBC registered retailer that, in the normal course of business, will accept one scrap tire for every new tire sold.” There are currently over 1,900 such retailers in BC that take back consumers’ scrap tires when new tires are purchased.

Some motorists choose to take their old tires home rather than leave them with the retailer for disposal. Some consumers take these orphan tires to landfill where they are held for collection by haulers. Based on collection data, this volume is approximately 3% of the total volume collected annually. However, recognizing this can be a 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. R2R locations are a subset of the over 1,900 retailers referenced above and are located in both rural and urban locations.
- Tire collection events are another convenient option for disposing of orphan tires. These events are held primarily between March and September every year in various locations throughout the province. Event locations are selected based on where demand exists and/or upon request by a retailer or local government. Some collection events are held in partnership with elementary schools that participate in the Artist Response Team’s educational program which teaches children through song about environmental stewardship. TSBC also seeks synergies to hold events in conjunction with other BC stewards, where possible. In 2018, TSBC will include a significant education component on what happens to the eco-fees and the products discarded.

Important to note is that no tires are refused at these events as TSBC recognizes the consumer could abandon them at a later time and place.

The collection and transportation of scrap tires from source locations throughout BC to processors is well established, efficient and effective with an estimated 100% “Capture Rate”:

**Capture Rate** = actual number of scrap tires collected / estimated number of scrap tires available for collection

This means that virtually 100% of the scrap tires **available for collection** at retailers or scrap tire generators (e.g., landfills and auto wreckers) are collected for recycling, energy recovery or reuse. There are no known stockpiles, and collection complaints from retailers, generators and consumers are extremely rare, demonstrating the effectiveness of the collection system and TSBC's confidence in the estimated number of scrap tires available for collection. TSBC will maintain annual contact with local governments through a survey of the BC Product Stewardship Council members to seek feedback on any known stockpiles or disposal issues for their residents and will also participate in the Council's monthly webinars and present to the Council upon request. TSBC will also continue to participate in the waste audits conducted jointly by the stewards under the SABC umbrella and these results will be reported in TSBC's Annual Report to the director.

In comparison, the common but imperfect measure of effectiveness of stewardship programs as required by the BC Recycling Regulation is the "Recovery Rate":

**Recovery Rate** = the actual number of scrap tires collected in the reporting year / the actual number of new tires sold in the reporting year

In a recent study conducted by Deloitte on behalf of the Ministry of Environment, it was recognized that the Recovery Rate, especially for long life products such as tires, is not a sound standalone measure especially if looking at only one year's data. TSBC's annual Recovery Rates have ranged in the last ten years from 73% to 90% with an average of 80%. The annual rates vary according to the number of new tires sold or scrapped in any year, both of which are sensitive to changes in BC's economy, weather and population.

To better understand the divergence between collected volumes and sold volumes, and to derive a better measure, TSBC engaged its audit firm to conduct research on what factors account for this delta.

The factors identified in the analysis were:

1. The time lag between the sale of a new tire and the time of collection, i.e. at end of life;
2. Sales trends / consumer behavior – winter tires, new car sales / vehicle registrations;
3. Permanent loss of tires available for collection – export of used tires, population migration; and
4. Efficiency of the scrap tire collection system.

The analysis concluded that with a robust collection system in place, the most quantifiable factors impacting the delta between sales and collections is the long-term life of a tire and the tire sales trends, neither of which can be influenced by TSBC.

An example of the Recovery Rate being an unmeaningful and imperfect measure to reflect performance is the Recovery Rate of 76% as reported in TSBC’s 2016 annual report. While this result alone would imply mediocre performance, there were no legitimate collection complaints and no known stockpiles. Driving the difference between sales and collections was the significant increase in sales, specifically those that did not generate a scrap tire (new car sales coupled with increased vehicle registrations and increases in winter tire sales by first time buyers). TSBC is reporting the same trend in 2017.

TSBC will continue to report on units sold and collected in the reporting year, including historical trends; however, the calculation used for the Recovery Rate will align with the average life of tire and therefore establish a more meaningful measure of program performance. Although there is no way to exactly tell the life of a tire due to design, driver’s habits, climate, road conditions etc., most research indicates that the average life of a tire is between 4 to 6 years. Therefore, going forward, TSBC will report its Recovery Rate as follows:

**Recovery Rate for Tires** = actual number of scrap tires collected in the reporting year / actual number of new tires sold 5 years prior to the reporting year

If restated for the years in the table, the results are as follows:

	2015	2016	2017
Current Recovery Rate calculation	79%	76%	73%
Proposed Recovery Rate calculation	90%	94%	96%

TSBC fully expects this rate will continue to fluctuate given the factors affecting sales and the increased and ongoing use of winter tires that will extend the life of a tire.

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

*The plan adequately provides for making consumers aware of the extended producer responsibility program; the location of collection facilities or the availability of collection services; and how to manage products in a safe manner.*

TSBC uses a variety of methods to raise consumer awareness of the program:

- TSBC website.
- Facebook and Twitter.
- Information brochures at the point of sale.
- Information available through the Recycling Council of BC (RCBC) Recycling Hotline and BC Recycles.

- TSBC-decaled trailers that travel throughout BC collecting tires.
- Media attention from special events, in particular TSBC's [Community Grant Program](#). This 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 requires that all grant recipients advise the MLA of the project and in 2019 this requirement will extend to informing mayor and council to ensure officials are aware of the use of recycled tires in their jurisdiction.

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

- [BCRecycles.ca](#) – a common website for information about BC's stewardship programs.
- [Recycling Handbook](#) – a common brochure that describes all of BC's stewardship programs.
- [Recyclepedia](#) – an enhanced web tool and app for consumers wanting to know where to recycle certain materials.
- Community events – attendance at community events throughout the province either in conjunction with other stewards or as part of the Ambassador Tour, led primarily by the BC Used Oil Management Association (BCUOMA).
- First Nations coordinator – a resource hired by Recycle BC but jointly funded by many of the stewards to assist in our collective engagement with First Nations to develop or improve the collection of stewarded products.
- Joint collection events – a specific activity going forward that will focus on consumer education and awareness, emphasizing what the eco-fee is used for and what happens to the tires.

TSBC also participates in the bi-annual Stewardship Agencies of British Columbia (SABC) consumer awareness survey that has established a baseline for consumer awareness on drop off locations, and where to find information on the drop off locations. It is important to note that for tires, most consumers leave their tires at the retailer location when new ones are purchased and as such most consumers rarely need to know where to drop off tires. However, to address the need for a performance measure in this area, starting in 2019, TSBC will conduct its own annual survey pertaining specifically to these two areas of awareness. The results will be included in TSBC's Annual Report to the director under Performance Measure and Targets. The 2016 SABC survey results will be used as the baseline.

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

*The plan adequately provides for assessing the performance of the producer's extended producer responsibility program and the management of costs incurred by the program.*

##### PROGRAM ECO-FEES

The program is funded by an eco-fee remitted by the retailer (producer) on every new regulated tire sold. TSBC does not have control over its revenue streams as this is dependent on product sales, which in turn is often dependent on the state of the economy.

On average, administration costs account for less than 8% of total revenues, which is in line with tire recycling programs across the country. Approximately 92% of the revenues are paid out in program incentives to: collect, transport, and process scrap tires; manufacture new products; host tire collection events; and provide community grants. TSBC operates a return to retailer model and so does not contract with any local governments or private depots to accept tires on its behalf. TSBC provides free pick up of all program tires from these facilities, with the exception of tires that contain dirt or other debris, are on rims, or are not readily accessible. In these cases, a fee may apply.

##### REPORTING

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 is also subject to an annual audit as required by the Ministry of Environment and the results are included as part of TSBC's annual report.

TSBC publishes its [program policies](#) which include the incentive rates for transporting and processing BC scrap tires and details of the Manufacturing Incentive Program.

##### RISK MANAGEMENT

TSBC has agreements with its recyclers and manufacturers which include but are not limited to the obligations of both parties with respect to insurance requirements, audit and reporting, performance measures and financial penalties, financial securities, and contingency plans in the event of fire, flood or market disruption.

TSBC maintains a reserve fund that assists in stabilizing eco-fees by addressing year to year cost variances resulting from program enhancements and fluctuations in sales and collection volumes. The fund also exists to provide support for research and development activities that align with TSBC's goal to *foster and support innovation and research relative to higher valued solutions within the industry*. TSBC's processing and manufacturing sectors have invested heavily in recent years to generate operational efficiencies and create new products, allowing TSBC to reduce the incentives paid (most recently on January 1, 2018) and/or build market stability for both sectors.

## 5. Management of Environmental Impacts [Section 5(1)(c) (v, vii & viii)]

*The plan adequately provides for assessing the management of environmental impacts of the program. The plan adequately provides for eliminating or reducing the environmental impacts of a product through the product's life cycle and for the management of the product in adherence to the order of preference in the pollution prevention hierarchy.*

There are many environmental benefits of diverting tires from landfills and 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 (GHG).

TSBC will also continue to manage collected products in accordance with the Pollution Prevention Hierarchy, whenever feasible and economically viable.

### **REDUCE**

While managing tires at their end of life is important, lengthening their lives so that fewer are used is essential. Tire manufacturers are making progress: since 1981 the average tire life has gone up 56% (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 Tire & Rubber Association of Canada in their annual [Be Tire Smart](#) campaign which focuses on educating the motoring public on the benefits of proper tire inflation and maintenance.

### **REUSE**

Known in the industry as culling, tires collected by the hauler can be diverted from recycling and sold as used tires. TSBC recognizes but does not financially support the culling of tires for reuse.

### **RECYCLE**

TSBC's ability to influence product design to increase recyclability is extremely limited. While this is an accepted and theoretically possible outcome in some industries, automotive tires are not simple consumer commodities. Instead, they are a critical element in the safe operation of motor vehicles. For this reason, the design and operating parameters of tires are mandated by federal regulation and international agreement. The things that make a tire "safe" also tend to be those that make it difficult to recycle. That said, international tire manufacturers are responding to the

environmental challenges of tire manufacturing by doing such things as replacing high aromatic petroleum-based oils with bio-based oils from corn, canola, oranges, etc. In addition, manufacturers are beginning to incorporate recycled rubber into selected tire types and are actively investing in new sources of natural rubber supply such as guayule and Russian Dandelion, which can be produced in North America.

A tire has three main components: rubber, steel and fibre. In BC, the majority of tires are recycled into:

- crumb rubber – granules of rubber with the steel and fiber removed; and
- mulch – tire shreds with the steel removed.

The crumb is used to create a variety of products including: athletic tracks and synthetic turf fields; playgrounds; colourful, resilient flooring in recreational facilities; and flooring and mats for agricultural and industrial use. The mulch is used to replace bark mulch and can be purchased by the public directly from many big box stores.

The steel extracted from tires during the crumb and mulch processing is recycled, the fibre is directed to a cement kiln for energy recovery, and any waste from the process is landfilled.

Beyond primary processing, TSBC promotes the use of BC's recycled rubber in products manufactured in BC through a Manufacturing Incentive.

## **ENERGY RECOVERY**

The remaining tires are used as tire derived fuel (TDF) to recover the energy. The steel in tires consumed in the cement kiln is used to replace virgin steel and although accounted for historically in the energy recovery volumes, arguably should have been considered recycling.

The policy of allowing some tires to be used as a fuel supplement is both environmentally and economically sound and a practice followed by many other Canadian provincial programs for a variety of reasons. It is a significant end use in both the US and Europe and taking a life cycle approach, studies conducted in this area concluded the following:

- [2010 Pembina Report \(Alberta\)](#)
  - “no outright winner... no option showed net benefit for all environmental indicators used.”
- [2008 Aliapur \(France\)](#)
  - “The environmental assessment of material recycling methods is not systematically better than that of energy recycling methods.”

TDF usage at the cement plant in BC requires environmental permits, which are issued by Metro Vancouver as the delegated authority for the Ministry of Environment.

TDF usage in BC has varied over the years, being primarily market driven in the past. However, in recent years the volume has held steady at around 12% of the tire volumes collected.

## RESIDUAL MANAGEMENT

The volume of material going to waste, which results from the recycling process and tires that cannot be processed, has dropped significantly. This is due to equipment upgrades at BC's recycling plant which have reduced the amount of waste from processing the tires and increased the ability to process tires that previously could not be recycled. At the time of submitting this Plan, BC's waste component is at an all-time low of 1%.

Going forward, the Performance Measure and Targets for environmental impacts will follow the Ministry required format. Already adopted by other BC Stewards, TSBC will now report the end fate by product component, which for tires is rubber, steel and fibre. The table below re-states TSBC's 2016 data previously reported under the old format. TSBC's 2018 Annual Report to the director and Non-Financial Information Audit will reflect the new format.

Component	Recycling	Energy Recovery	Landfill	Total
Rubber	79.4%	18.5%	2.1%	<b>100%</b>
Steel	100%	0%	0%	<b>100%</b>
Fibre	0%	99.6%	0.4%	<b>100%</b>

Important to note is that a tire component is tracked and reported only if it is separated from the whole product during the recycling process. An example from the table above is the rubber component of 18.5% under Energy Recovery, which also includes the steel and fibre within the tire as these materials are not extracted from the tire prior to entering the kiln. In the case of numbers reported for the steel and fibre components, these are residuals extracted during the recycling process. This distinction is important as the data reported to the Ministry must be audited and an estimate of the percentage of steel and fibre in a whole tire or tire shred entering the kiln would not be considered auditable.

TSBC's focus in recent years has been to divert the amount of waste and tires from landfill to energy recovery and/or recycling. As noted earlier, TSBC is pleased that an all-time low waste level has been achieved. Through Research and Development funding, TSBC is currently supporting the work of a third party to find a recycling end use for fibre, a residual from the crumb recycling process. More information on the project can be found on the UBC website and TSBC will provide any significant updates in its Annual Report.

## 6. 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 extended producer responsibility program.*

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

- Having written contracts with all companies that receive financial incentives from TSBC (Participants).
- 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.
- Hauler and local government representation on TSBC's advisory committee.

There have been no disputes since TSBC implemented the program but in the event that one occurs, TSBC has set out a dispute resolution procedure in its contracts with Participants. This involves a multi-step settlement process that starts with negotiation before moving to mediation where the costs are shared equally among the parties involved.

## 7. 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 extended producer responsibility program.*

### STAKEHOLDER CONSULTATION – DURING TERM OF THE PLAN

TSBC connects with many of its stakeholders on an ongoing basis and this will continue during the operation of the program:

- The TSBC Advisory Committee convenes once a year and upon request by any of the members. The committee is made up of a broad reach of stakeholders including producers (retailers), service providers and local government. The committee has an opportunity to address any specific issues, to learn of any TSBC program updates and to provide advice on any operational or policy issues presented for discussion.
- The BC Product Stewardship Council holds frequent conference calls for the purpose of updating stewards on local government issues and for stewards to present to local

government. This ongoing dialogue has been beneficial to keeping all parties up to date on current issues.

- The Ambassador Tour visits to retailers throughout the province seek feedback on the program, in particular tire collection.
- Partnership meetings with key service providers occur monthly or quarterly and assist in keeping current on any issues or developing threats to the operation of the program.
- Monthly communication to retailers provides them with key updates / messaging.
- Quarterly dialogue is held between TSBC member organizations and the director that represents the member organization on the board. This allows for any member organization concerns to be conveyed to the board and staff and allows for a transparent process.
- Staff attendance at key conferences enables face to face dialogue with other stakeholders to specifically address any issues.

#### **STAKEHOLDER CONSULTATION – INPUT TO THIS PLAN**

(to be added after consultations)

#### **8. 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 measure, performance requirements or targets established by the director; and*
- *any performance measures, performance requirements or targets in the plan.*

TSBC commits to achieving the following annual targets (table 1) and reporting commitments (table 2). The results of both the performance targets and reporting commitments will be included in TSBC's Annual Report to the director submitted on or before July 1 every year. Performance Measures 1, 2 & 3 are subject to third party assurance (Non-Financial Information Audit).

Table 1.

Performance Measures		Annual Targets			
1.	Recovery Rate ( <u>Total # Units Collected in reporting year / Total # Units Sold 5 years prior to reporting year</u> )	80%			
2.	The percentage allocation of total tonnes of scrap tires (i.e. all rubber, steel and fibre) <u>processed and shipped</u>		Recycling	Energy Recovery	Landfill
		Rubber	84%	15%	1%
		Steel	100%		
		Fibre		98%	2%
3.	Number of collection sites (i.e. registered retailers that will take back a scrap tire from the consumer at the time a new tire is sold)	1,700			
4.	a) Total number of retailers and generators in BC that take back orphan tires (R2R)	a) 700 province-wide			
	b) Number of R2Rs in each Regional District	b) At least 2 per Regional District			
5.	a) Awareness of where to take scrap tires for safe disposal	a) Maintain or increase awareness level of 57%			
	b) Awareness of where to go to find information on safe disposal locations	b) Maintain or increase awareness level of 73%			

Table 2.

Reporting Commitments	
1.	Total tonnes collected by Regional District in a calendar year / total KG per capita for all of BC
2.	Dates, locations and results of tire collection events
3.	Number of legitimate collection complaints received by TSBC
4.	Number of consumer complaints received by TSBC
5.	Comparison of results to targets for all Performance Measures
6.	Independently audited financial statements
7.	Non-financial audit report
8.	Total product collected and sold in the reporting year
9.	Description of how the product was managed in accordance with the pollution prevention hierarchy
10.	Location of collection facilities
11.	Description of educational materials and educational strategies used
12.	Efforts taken to reduce environmental impacts, to increase reusability and recyclability

## Appendix I Tire Definitions

### SECTION I: TIRE PRODUCT CATEGORIES INCLUDED

Tire Type	Definition
<b>Passenger Tires, Small RV Tires and Light Truck Tires</b>	<p>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).</p> <p>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).</p> <p>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).</p>
<b>Motorcycle, Golf Cart and All Terrain Vehicle Tires</b>	<p>Includes all tires specifically designed for on/off highway motorcycles, motorcycle sidecars, motor bikes, mopeds, mini-cycles, golf carts and all terrain vehicles.</p>
<b>Forklift, Small Utility and RV Trailer Tires, Bobcat/Skid Steer Tires</b>	<p>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).</p>
<b>Agricultural Tires (Small)</b>	<p>Includes drive and free rolling farm and implement tires up to 16" deemed for use on farm equipment.</p>
<b>Medium Truck Tires</b>	<p>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).</p>
<b>Agricultural Drive Tires (Medium)</b>	<p>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.</p>
<b>Forklift, Bobcat/Skid Steer Tires</b>	<p>Includes pneumatic forklift tires, Bobcat/Skid Steer Tires measuring 16.5" and over.</p>
<b>Logger/Skidder Tires, Agricultural Drive Tires (Large)</b>	<p>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.</p>

*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 and Rim Association of the United States as amended from time to time.*

## **SECTION II: TIRE PRODUCT CATEGORIES EXCLUDED**

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 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.