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grathbone@rpra.ca

March 1, 2018

Geoff Rathbone, Director of Transition
Resource Productivity and Recovery Authority (RPRRA)
4711 Yonge Street, Suite 408
Toronto, ON M2N 6K8

Dear Mr. Rathbone,

RE: Proposed Used Tires Program Wind-Up Plan by Ontario Tire Stewardship

The Association of Municipalities of Ontario (“AMO”), the City of Toronto, the Regional Public Works Commissioners of Ontario (“RPWCO”) and the Municipal Waste Association (“MWA”) collectively submit these comments on behalf of municipal governments regarding the Ontario Tire Stewardship’s (“OTS”) wind-up plan for the Used Tires Program (UTP). We appreciate the opportunity to provide comments for your consideration as the wind-up plan will undoubtedly inform how the other waste diversion programs will wind-up in the future.

As you are aware, municipal governments operating tire collection sites have had difficulty in receiving payment from OTS for services provided. Efforts between municipalities, RPRRA and OTS have helped resolve these issues and we thank you for your assistance with this. It will be important to ensure payments continue during the wind-up of OTS.

Timelines for Payments

Municipal governments are supportive that there will be no changes to payment rates for tires. However, the time for payment of service provider year-end 2018 inventories will be condensed, and as a result the reporting will be as well. According to the wind-up plan, “processes year-end inventories must be confirmed by an OTS audit process which will be completed by January 31, 2019.” This will likely be problematic for many municipalities, as this work will need to occur over the holiday season creating time pressures on the early New Year in order to be paid. Some of this may be overcome through planning and communication but some additional discussion with OTS and potentially some latitude on timing, especially for smaller municipalities, may be necessary.

OTS TreadMarks System

The wind-up plan continues to recommend that producers are the only ones with the ability to use the OTS TreadMarks system – a proprietary software and hardware computer system developed specifically to track tire and used tire flows in the UTP. While OTS proposes to make TreadMarks widely available to producers, the system would not be available to municipalities, service providers and other stakeholders. We suggest that a dialogue occur on how the TreadMarks system can be

more widely available to all stakeholders. This system was paid for by Ontario consumers and as a result its ownership should not be restricted especially in a manner that could restrict future competition.

Competition

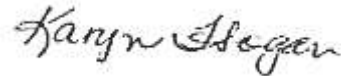
Municipal governments support the transition to an individual producer responsibility model under the RRCEA. We recommend that the Authority ensure there are no barriers created by OTS as a result of the wind-up which could affect competition when the program is transitioned to IPR.

We look forward to the opportunity to ongoing consultation with the Authority on the future wind-ups of the OTS and other remaining waste diversion programs.

Sincerely,



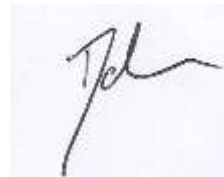
Fred W. Jahn, P.Eng
Chair, Regional Public Works Commissioner
Of Ontario



Karyn Hogan, BA, MLIS, MA
Chair, Municipal Waste Association



Jim McKay
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Solid Waste Management Services
City of Toronto



David Gordon
Senior Advisor, Waste Diversion
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