

Review of Weight Conversion Factors for Tires

Webinar for producers

June 18, 2019



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Agenda

1. Purpose of today's webinar
2. Overview of existing weight conversion factors
3. Why is a review needed?
4. Questions for consideration
5. Next steps

Purpose of today's webinar



Purpose

- To review the existing Registry Procedure that outlines the weight conversion factors for tires
- To consult with tire producers on whether there is a need to change the procedure and the options for changing it

Overview of existing weight conversion factors



Background

- In February 2018, the Registrar developed a Registry Procedure that established:
 - weight conversion factors that can be used to determine the calculated weight of tires; and
 - the minimum weight of a large tire
- The initial version of the procedure set out conversion factors for new tires but was amended in April 2018 to apply to used tires as well
 - We are consulting in two stages:
 - with service providers, regarding the use of conversion factors for used tires
 - with producers, regarding the use of conversion factors for reporting new tire supply
- The procedure adopted the approach taken by Ontario Tire Stewardship (OTS) that established 18 categories of tires, comprised of passenger and light truck tires, medium truck tires and 16 categories of off the road tires
 - There is a weight range and weight conversion factor for each category



What is calculated weight?

- Calculated weight is a pre-determined units to weight conversion that may be used for reporting:
 1. **Producers are required to report to the Authority the number of units and weight of the tires they supplied into Ontario**
 2. **Service providers are required to report to the Authority, amongst other things, the number and calculated weight of used tires they retread or sell for reuse**
- Calculated weight is defined in the Tires Regulation and is either:
 - the actual weight, or
 - the weight calculated in accordance with the weight conversion factors set out in the Registry Procedure

What is calculated weight?

1. Producers are required to report the number of units and weight of tires supplied into Ontario

- Producers may use calculated weight when they report the number of tire units and weights they supplied into Ontario rather than reporting actual weight
- This information is used to establish an individual producer's collection target
- The collection target is based on the average of three years of new tire supply data, multiplied by 85% to account for used tires weighing about 15% less than new tires

What is calculated weight?

2. Service providers are required to report to the Authority, amongst other things, the number and calculated weight of used tires they retread or sell for reuse

- Producers are required to meet resource recovery targets, based on kilograms of resources recovered from used tires that result from any of the following activities and which can count toward a producer's recycling target:
 - reuse without modification
 - retreading
 - processing into new products
- Producers may use the calculated weight of used tires that were separated and sold for reuse on their behalf by a collector, hauler, processor or retreader toward their recycling target
- Producers may use the calculated weight of tires that were retreaded on their behalf toward their recycling target

How is calculated weight used by the producers?

- Under the Tires Regulation, producers were given two options for calculating the weight of tires they supply into Ontario when reporting to the Authority:
 1. the actual weight; or
 2. the weight based on applying a conversion factor to the number of units supplied into Ontario
- These options were made available so that producers could utilize the supply data they had previously submitted to OTS to meet their RPRA reporting requirements
- Producers who use their OTS data are not required to provide a third-party audit to verify that data

Weight Conversion Factors in the Registry Procedure

Tire Type (Tires Regulation)	Tire Category ¹	Tire Categories Description		Weight conversion factor (kg)
Passenger and Light Truck Tires	1	On-Road Passenger and Light Truck Tires		12.5
Medium Truck Tires	2	On-Road Medium Truck Tires		50
Off the Road Tires other than Large Off the Road Tires	3	Off the road Pneumatic Tires	1 to ≤ 15kg	10
	4	Off the road Pneumatic Tires	> 15 to ≤ 30kg	20
	5	Off the road Pneumatic Tires	> 30 to ≤ 70kg	50
	6	Off the road Pneumatic Tires	> 70 to ≤ 120kg	80
		Agricultural Tires ² Pneumatic Tires	> 70 to ≤ 250kg	
	7	Off the road Pneumatic Tires	> 120 to ≤ 250kg	200
	8	Off the road Pneumatic Tires	> 250 to ≤ 375kg	310
		Agricultural Tires ³ Pneumatic Tires	> 250 to ≤ 700kg	
	9	Off the road Pneumatic Tires	> 375 to ≤ 700kg	600

Large Off the Road Tires	10	Off the road Pneumatic Tires	> 700 to ≤ 1200kg	930
	11	Off the road Pneumatic Tires	> 1200kg	2230
Off the Road Tires other than Large Off the Road Tires	12	Off the road Solid & Resilient Tires	1 to ≤ 30kg	20
	13	Off the road Solid & Resilient Tires	> 30 to ≤ 60kg	40
	14	Off the road Solid & Resilient Tires	> 60 to ≤ 250kg	100
	15	Off the road Solid & Resilient Tires	> 250 to ≤ 375kg	310
	16	Off the road Solid & Resilient Tires	> 375 to ≤ 700kg	600
	17	Off the road Solid & Resilient Tires	> 700 to ≤ 1200kg	930
Large Off the Road Tires	18	Off the road Solid & Resilient Tires	> 1200kg	2230



Questions?



**Why is a
review
needed?**



Why is a review needed?

1. Variability within tire categories impacts collection targets

- The passenger and light truck tire category ranges from small compact car tires to large SUV tires
- The medium truck tire category also shows variability in size
- There is considerably more variability within each of the sixteen categories of off the road tires
- This means that there is cross-subsidization within tire categories, with some producers having collection targets that are too high and others too low
- This variability may mean that the weight reported for the reuse or retreading of tires may be inaccurate



Why is a review needed?

2. 2018 is the last year in which producers reported tire supply units to OTS

- This 2018 data can be used by producers to meet their RPRA supply data reporting requirements in 2020
- The OTS used tire program ended on December 31, 2018 and producers are no longer reporting supply data to OTS
- As of January 1, 2019, producers must keep track of the units and weights supplied into Ontario each year, so that it can be reported to RPRA two years later (e.g. 2019 supply data will be submitted in 2021)
- This data, which was not previously submitted to OTS, must be verified by an independent auditor

Why is a review needed?

3. Inconsistent use of weight conversion factors

- The 18 OTS categories have been used by producers for several years for reporting their new tire supply to OTS
- However, they have not been used the same way by used tire service providers reporting to OTS
- Used tire counts are estimated by collectors and haulers at the point of collection, while processors use the actual weight of the tires they receive for processing



RPRA

Resource Productivity
& Recovery Authority

Questions?



Questions for consideration



Questions for consideration

1. Should the current 18 categories and related weight conversion factors be kept?
2. If not, should the passenger and light truck category or medium truck category related weight conversion factors be kept?
3. Should the weight established in tire manufacturer specifications be used?
4. What would be easier for an independent auditor to verify:
 - tires are properly reported in the existing 18 categories; or
 - the number of tires and the weight calculated using the manufacturer specifications are properly reported?
5. How should the weight of used tires sold for reuse be determined?
6. How should the weight of retreaded tires be determined?
7. If there are changes to how calculated weight is determined, should those changes apply to supply data beginning in 2019 or 2020?



Questions?



Next steps



Next steps

- You can find all consultation information, including this presentation, at <https://rpra.ca/consultations/current-consultations/development-of-new-weight-conversion-guideline-and-supply-audit-procedure/>
- Please send any additional feedback and comments to consultations@rpra.ca by **June 25**
- Results of the consultations will be used to determine how calculated weight will be established for tire supply data and any resulting changes will be reflected in an updated registry procedure
- This review of the weight conversion factors will be followed by the development of an audit procedure for new tire supply data
- If you have any questions not related to this consultation, you can contact our Compliance and Registry Team at registry@rpra.ca or 647-496-0530



Questions?

