

June 29, 2026

Tire Stewardship BC Draft Program Plan Feedback
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To Whom It May Concern:

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems.

We are pleased that BC has regulated these products and that this EPR program exists. The program has evolved a lot and set up many strong elements since it first began which is to be commended. However, as the program plan goes for its next renewal, we submit these comments in hope that the program will not just *meet requirements* but really show leadership in the realm of EPR to move it beyond downcycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

Please see our comments by section below:

Section 1. Program Structure

TSBC is to be commended for having a voluntary bike tire program. Now that it has been running for some time, the program should ask the province to include bicycle tires in the Recycling Regulation, advertise it well, garner more collection sites, report on metrics and ensure the stewards are paying appropriately. It should also push to expand the product categories to include all tires, including those on rims.

We appreciate the Board made up of BC-specific producers and the advisory committee with a wide range of stakeholders. It may be sound to add reuse, repair and retread organizations and others focused higher up the hierarchy. In addition, non-producer interested parties could be added to the Board or given observer status.

We think that it would be a positive step for TSBC to set a policy statement that as a PRO, with a producer-dominated board, it will not lobby for weakening of regulations nor reductions of requirements that would go against the pollution prevention hierarchy and intention of EPR regulations (as defined in the CCME Canada-wide Action Plan). This would reduce the risk that as more products are regulated in more jurisdictions, that the PROs themselves become roadblocks to further environmental and social benefits of the programs and innovation (as identified in Zero Waste Europe's [Designing EPR to foster the EU's competitiveness and strategic autonomy](#)).

Section 2 Consumer Access to Collection Facilities

Access to Collection

The number of collection facilities is impressive but removing barriers for consumers should be a focus. Tires on rims should also be accepted as for many consumers this is a barrier, and the program should remove the limit of four tires at all collection sites. The program should show the percentage of tires collected from local government facilities (as well as by the other forms of collectors) and compensate these facilities appropriately to ensure there is no fee charged to the end user. Many local governments have a long history of collecting tires (as it previously was mandated by the province) and so the public usually thinks of those locations as the first ones to use. If the program wishes to shift this, it will need to significantly ramp up its communication efforts and partner with local governments to help redirect the tires. As local governments may not be compensated by the program for collection, they may charge tipping fees. This then may push consumers to hide their tires in waste (which could explain why tires show up in some waste composition studies) or illegally dump them. Of note, it was a goal of the 2006 plan to eliminate scrap tire tipping fees but that plan said that ensuring the financial affairs were in order needed to be addressed first. Fifteen years later, this still remains a problem but it is clear the program is financially stable. The program should work to include willing local government collection sites into the program as official (and compensated) collection sites. This is especially important as the local government sites may be the fall back for consumer drop off due to the very low awareness levels for a program over 20 years old. It should also be noted that two clean outs a year still can represent significant storage costs for local governments and reflect an ongoing subsidy to the program. Finally, consumer convenience would dictate that being able to drop off multiple materials at one location would have consumers choosing local government depots over retail drop off, particularly if there are other restrictions (hours, drop off limits, etc.).

While the number of collection sites in the annual report is impressive, it does not denote the number of each kind of collection site. The map on the website should show all locations on the map and make it clear which ones are only if a new purchase was made. Similarly, the annual reports and auditing should reflect this too. The ideal scenario for a program is a barrier-free (accepts rims, no fee, does not require new purchase, no limit on number of returns) collection location in every community in BC (not just 25% of registered retailers in a regional district which could still result in some very long travel times to properly dispose of tires) and TSBC



should work towards this in collaboration with the BC Product Stewardship Council and the Indigenous Zero Waste Technical Advisory Group. TSBC is commended for not using the SABC standard which does not provide suitable accessibility.

An analysis of TSBC locations based on the collectors list in the 2022 annual report showed no facilities existing in the following communities .

Regional District/Community	Populatio
Granisle	342
Central Saanich	18,220
Esquimalt	18,725
Highlands	2,802
Metchosin	5,328
Oak Bay	18,810
View Royal	12,482
Wells	228
Silverton	188
Lake Country	17,136
Cumberland	4,703
Harrison Hot Springs	1,981
New Hazelton	631
Midway	681
Montrose	1,067
Warfield	1,828
Anmore	2,540
Belcarra	728
Bowen Island	4,423
Lions Bay	1,444
Alert Bay	468
Port Alice	772
Lantzville	4,055
Port Clements	351
Port Edward	478
Coldstream	11,581
Hudson's Hope	997
Gold River	1,323
Sayward	335
Tahsis	380
Zeballos	133
Lytton	221
Sun Peaks Mountain	1,501

Note the locations identified above were found using the list of location in the 2022 annual report and categorizing them by address. There may be some errors in community assignment where the community name is mismatched with physical location or name of town on address and 2059 sites were listed but only 2053 had locations. For example, some locations labelled North Kelowna may be outside Kelowna. Langley and North Vancouver addresses are not marked by City or District. No facilities were found in the Stikine region. The program itself should show all collection sites with the name of the municipality in which they are and show clear changes in each report (for example, 10 new facilities and list names, locations and regional districts, with the same for closed facilities). This data should be made public in an excel spreadsheet and also provided to RCBC and the Ministry.

The number of collection sites per capita by regional district can vary from none (Stikine region) to low 5.75 kg (Capital Regional District) to a high of 40.13 (Peace River Regional District). In addition to this, of the over 2000 sites, only 763 will allow returns of so-called “orphan” tires and this number is the one that should be used for analysis of access for consumers. This shows that while numerous, there are still gaps in the collection site system.

The goal of TSBC should be to not require collection events as the collection network should be very robust and well known. They should be used only as a temporary measure (up to 1 year) until a no-barrier collection site can be arranged, or as an awareness raising platform.

TSBC should also do secret shopper trials to see how easy it is and how welcoming the collection sites are to those citizens or businesses returning tires. Given that these sites are not compensated, there may be less willingness to accept tires or encourage consumers to bring them in. This then would be a missed opportunity to get more tires and may require program modifications.

While the annual report includes working with groups to partner on cleanups, this plan should note it as well. Given that tires are a common item for illegal dumping, the program should take proactive steps to minimize the occurrence as well as assist in the cleanup. Data gathered on illegal dumping could be used to understand why this occurs (as well as where and when) and then develop an action plan to minimize it. A designated percentage of the program funds should be allocated to clean ups. This should also include support for clean up of tires after a second life in uses such as dock bumpers or docks.

Recovery Rate -the 2024 99.81% rate is exceptional and the program should aim to maintain or exceed that high level. For a program with such a long history, aiming for 98-100% is achievable, especially if working with local governments to understand why the remainder is not handled correctly. Part of this work can be looking at where the uncollected tires end up, in what numbers and why.

The use of the recovery calculation using sales from five years past does mean that it may be subject to variation as a result of changes in sales. A better approach may be to use a rolling average of the sales 4 to 6 years back to account for this. In addition, surveys could be used to determine consumer behaviour with regard to winter tires and longevity of the tires.

While it is a good way to support purchase of retreaded tires not to add a fee to the sales, data on the sale of retreaded tires should be gathered. If they are retreads of sold-in-BC tires for BC customers, the impact of these sales may be solely in the extended lifespan of the tire and will not make much difference unless annual sales dramatically differed. However, if the retreaded tires come from outside of BC, then the recovery rate may be artificially high. A target should be set to increase the percentage of sales that are retreaded. The fact that the plan notes some haulers may export tires for reuse shows a significant opportunity for reuse. The program should focus on supporting this and create escalating targets for reuse, supported by active management by the program or incentives to do so, while tracking the data.

Section 3 Consumer Awareness

For a program operating as long as TSBC has, it is surprising that the level of consumer awareness is not higher. The fact that the recovery rate is high despite this shows the



importance of a good collection network. For the millions of tires that have not been collected, far more should be done to raise awareness of the program. The goal should be to get 95% of the population aware by 2024 (and later 100%). To do otherwise is to continue to externalize costs to the public (local governments in particular) and the environment. The program could also pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing the tires away is not appropriate.

The surveys are one tool, but more campaigns should be created based on an understanding of which end users do not know about the program and how to reach them. Metrics for these specific campaigns should be measured and used to adjust the communications or other aspects that are shown to be barriers (for example, tipping fees).

The list of delivery methods is good but needs to be enhanced given the continued low awareness levels. TSBC is to be congratulated for being an early partner with the First Nations Recycling Initiative. Overall, TSBC should allocate significantly more funds to raising awareness levels.

Section 4 Management of Program Costs

It is suitable that TSBC is compensating transporters and processors. As noted above, compensation for local government collectors should occur as well. First Nation community collection sites should also be compensated. An analysis of the need for compensation for other collectors should take place as well. When these items are under consideration, the program should look at offering insurance for collectors if this is a barrier for some (more likely for local governments and First Nations than sites that sell tires).

We are pleased that the fees have increased for some categories and that the categories are more nuanced. Further fee increases should be considered to fairly compensate local government collection sites and others, raise the awareness level of the program with stronger communications tools, fund research into product redesign and the safety of the tire management processes, fund community clean ups, fund reuse initiatives and other measures to improve the program.

Advance Disposal Fees	2007	2020	2026
Passenger and light truck tire (2026 list includes same fee for new categories of Motorcycle, turf, ATV; forklift, small utility, RV Trailer, Bobcat/skid steer tires; agricultural (small))	\$4	\$5 (changed to \$5 in 2008)	\$6.5
Medium truck tire	\$9	\$9	\$21

(2026 list includes same fee for a category of forklift, bobcat/skid steer tires)			
Agricultural drive tire	\$15	\$15	\$15
Logger/skidder tire	\$35	\$35	\$35

The program should plan to enhance its differential fee system based on certain criteria such as lifespan, options for reuse, use of easy to recycle materials, etc. to drive product design change as intended by the Canadian Council of Ministers of Environment (i.e. not just based on the current costs to manage an item; the differential should be used as a market signal to drive change).

The use of incentives for transportation and processing is effective however; the program is responsible for the materials and so should have effective measures in place to gather data and ensure appropriate handling and end use of materials. The statement "some haulers will cull tires collected at the retailer's locations for the export reuse market" shows a gap in the knowledge and a weakness in the chain of custody that needs to be addressed. An assessment of the transportation incentive should be conducted to ensure all communities (even those only accessible by ferry or sea or longer roads) can still have their tires collected. The current system seems to pay more for shorter hauls and may not be sufficient for more remote communities. It is unclear if the program can guarantee a timely pick up based on these incentives, including to local government and First Nation sites. In addition, with a glut of collected tires in other provinces, what steps are put in place to ensure there is not some degree of import of used tires, possibly filling a back haul?

The processing fees should also be realigned to support the highest and best use of the materials. This should start with assessment for reuse, retreading, use in original form such as blasting mats. The appropriateness of other uses will be discussed below.

There needs to be dedicated budgets for reuse incentives, research and development, collaborating with tire design teams, and litter/illegal dumping/coastal cleanups.

Section 5 Management of Environmental Impacts

Redesign

Since the last program plan, much more is known about the risks of some tire components, specifically 6ppd-quinone. The last plan approval had this direction from the Ministry, "TSBC is expected to report on efforts that have been undertaken both nationally and within B.C. to reduce the impact of tire road wear particles (TRWPs) containing this compound on fish-bearing waters in the future. Such efforts could include supporting initiatives to prevent TRWPs from impacting salmon populations (e.g., coordinating with local governments to educate/implement stormwater management practices and/or capturing tire debris before

they are transported into watercourses).” Since the next annual report has yet to come out, it is unclear what actions are being taken but we fully support work in this direction. The program’s continued support to make crumb rubber out of tires and distribute it across the province is very concerning. A recent UBC study found artificial turf a threat to salmon.¹ In addition, there is a bill in Washington State to protect salmon and human health by phasing out toxic 6PPD in tires by 2035 and incentivizing safer alternatives.²

The use for playground mats and mulch may be a form of recycling, but with the increasing data about the potential harm alternatives should replace these uses. Not only can it expose children to potentially harmful chemicals, but the widespread distribution, particularly of crumb rubber, increases the risks and dispersion of the problem. Research should be done to see how the problem chemicals can be removed or replaced with safer alternatives (redesign). In the interim, the program should stop incentivizing the use of crumb rubber and favour other options that keep the material in a cohesive solid form that can be easily collected and removed. The program should also take responsibility for the collection and processing of all crumb rubber that has been processed on its behalf (either at the end of its useful life or at the request of the owner). The province should work to ban crumb rubber sold for landscaping as this is essentially litter than will be very hard to extract from the ground and will continue to pollute. The program should support this by providing research and data. The province should also take steps to mirror the Washington State direction, with the program supporting.

The program should ensure that any rubber product containing used tires should have warning labels on it explaining the risks and mitigation (i.e. best to use for indoor mats or areas where water run-off is controlled and pollution managed).

Another redesign question is if the passenger and light truck tires could be designed for retreading as a way to extend the lifespan. The program should conduct and publish research on this.

The plan notes that TSBC’s ability to push for redesign is limited, however there is a network for tire programs across Canada and elsewhere that collectively are facing the same issues and collectively could wield greater influence. A key aspect of an EPR program should be providing feedback to the producers and manufacturers, especially the design departments, so that product end-of-life considerations can inform design. Innovation happens when there is a need and when the information is flowing appropriately.

Reduce

¹ CBC article <https://www.cbc.ca/news/canada/british-columbia/ubc-study-finds-artificial-turf-fields-threat-to-salmon-9.7136573>

² Washington Bill <https://lawfilesexternal.wa.gov/biennium/2025-26/Pdf/Bills/House%20Bills/2421.pdf>

TSBC and its members are doing well with the extension of the tire lifespans and it would also be good to know what portion of that change has occurred in the last decade.

Reuse

TSBC should be actively promoting reuse as part of the program and gathering all associated data, including that which will inform the recovery rate. A formal process should be enacted to assess all incoming tires for the potential for reuse or retreading. The program should set a target for retreading, starting with bus and truck tires and collect baseline data for all tire types.

Recycle

Ideally, research should be done to see what the barriers are to using the rubber in new tires or other products that represent higher and better use.

As noted above, the use of tires in crumb rubber going to mulch, turf and playground mats is **very** concerning as now there are many small pieces of potentially harmful rubber distributed in the environment. It will be hard to ensure collection of this material and it has been shown to be leaching chemicals into streams, a potential liability for the program. Also, as this effectively transfers a material from within a program to outside of the Recycling Regulation, often with the support of Community Grants, there should be provisions made to steward the mats at the end of their useful lives; otherwise the grantees and community groups will end up with a liability.

Perhaps more of a focus on the manufacturing incentive to drive the use of rubber in products already requiring rubber (such as new tires) may be beneficial, with care taken to ensure this does not result in more dispersal of small bits of rubber.

Energy Recovery

The use of tires for energy is problematic as this releases GHGs when GHG emissions need to be radically reduced. The US EPA WARM model³ shows that combustion of tires releases more GHGs than landfilling. While redesign, reduction, reuse and recycling are all preferable to disposing of an item, perhaps sequestering the carbon rather than releasing it through combustion may be the better option. Another concern is that if these are combusted at cement kilns, these facilities have lower standards for air emissions than even an incinerator and with fewer requirements for testing and keeping the public informed. If the ash is used in concrete, then analysis should be done for what chemicals from tires can then be found in the cement, what the leaching potential is, and what that impact could have. This research could help to minimize the risk that not only tires may be polluting the streams, but also the products

³ US EPA, November 2020. Documentation for Greenhouse Gas Emission and Energy Factors Used in the Waste Reduction model (WARM) -Management Practices Chapter, Exhibit 1-1.
https://www.epa.gov/sites/production/files/2020-12/documents/warm_management_practices_v15_10-29-2020.pdf

made with the cement. Of note is that cement facilities burning coke or coal have one kind of fuel that they were designed to use and the pollution mitigation equipment is more likely to be designed for the type of pollutants associated with those fuels and may not be appropriate nor adequate for the burning of tires. It is also hoped that allowing this fuel for cement kilns is not slowing the progress on finding lower carbon methods of making cement, nor keeping costs artificially low.

The program should make a public commitment to avoid pyrolysis and chemical recycling to fuel

Residual Management

The plan states that the landfilled waste is low but it would be good to know how much by showing not just the percentage allocation of the tires to recycling, energy recovery and landfill, but also the tonnage. This would make it clear the scale of rubber, fibre and steel going to each end fate. A goal to end landfilling is good but first there should be a goal to end energy recovery so this does not exacerbate the climate impact. The program should do a thorough analysis of the climate impact of the program and each of its activities and then develop targets and a plan to reduce them. The Aliapur and Pembina analyses were done in 2010 using options available at that time but a new analysis should look at what is possible (in terms of making new tires, etc.) rather than just what currently exists locally given the additional programs globally, new information on harms, new technology available and the program's mandate to reduce the environmental impact.

Section 6 Dispute Resolution

The equity of this system needs to be restored. Collectors and service providers have very little clout. Service providers cannot take a PRO to arbitration. It's too expensive and takes too long. They risk going bankrupt or losing market access. This is even harder with the "incentive" model. The monopsonies (PROs) are 'too big to fail'. Many contracts or incentives can be cancelled if a service provider files a dispute because there is a reputation clause. Some PROs use their monopsony power to silence its service providers with a threat of ending market access. Programs should make their contracts public and there should be no clauses that restrict a depot's ability to dispute an issue. There is a model for dispute with power imbalances for First Nations model and this model should be adapted.⁴

Section 7 Performance Management

Here are the recommendations to strengthen the targets in Appendix A:

⁴ Dispute model <https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/environmental-assessments/environmental-assessment-process/guidance-materials/indigenous-nation-guidance/dispute-resolution>.

- 1/2- Ideally the program would report on historic sales, especially in the years during which it can be expected sales were made for tires being returned now. This should be done by tire type.
- 3 -As noted the recovery rate should be 98 - 100% and differentiated by tire type.
- 4 -The tonnage by regional district (and ideally community) should be provided as well as collection per capita per tire type to see where the program works very well and where it can improve. Showing this by tire type will be important as for some kinds of tires, they may not be evenly distributed across the province. It is also important to report collection by collection facility type with local government and First Nations collections accounted for separately.
- 5 -Waste composition studies should be more frequent and cover a wider range of regional districts. There could be a target for this set with BC Product Stewardship Council. This data should be made public and as transparently and with as much detail as possible. See note below.
- 6 -Please also note the tonnes when reporting. Energy recovery should be phased out. Targets for reduce and for reuse should be added. Reporting should be done by material
- 7 -Set an initial target for this to be 10% of program activities and funding. There is currently no target nor commitment.
- 8/9 -As noted, collection facilities should be listed by category with the target being all municipalities (and First Nation communities who wish it) have at least one no-barrier collection site. An additional target should be all local governments and First nations communities that opt in are to be compensated collection sites with 50% in year 1 and 100% by year 2. The list should also show actual municipality in which the collection site is in.
- 10 -move collection events to the awareness category.
- 11 -report total complaints as well. The word “legitimate” (unclear if this is defined somewhere else on the program website) makes it sounds like outside oversight is needed to ensure all complaints are being heard.
- 12 -These awareness targets are too low (even weaker than the approved 2024 plan which were also too low) and the escalation should be much more rapid. Include awareness of the fact that there is a program or special way to dispose of tires and that it is free, as well as of tire maintenance. Bike tire awareness to be measured separately. Clearly additional funding and initiatives are needed though this could be helped significantly by onboarding local government sites with associated press releases.
- Overall -The program should go beyond the bare minimum required and provide third party audits for certain ones of the other components.

The use of waste composition audits is good. The results should be published on the TSBC website, and all of the details of the studies should be included in the annual report to the BC Government and made public. This data should be used to understand the degree of success of collection given the challenges noted in the plan. To achieve this, TSBC should work with other producers to take a comprehensive and methodical approach to identifying when and where



waste composition audits are being conducted (residential waste but as some of the program products are also at industrial, commercial and institutional settings, those should be considered as well). It is currently up to the local governments to reach out to SABC to see if there is interest to participate in a waste composition and it is not guaranteed that they will work with the local government. As waste composition data provides a rich source of insight into whether a program product is/or isn't ending up in a landfill or transfer station in an area, there should be more effort on behalf of the EPR programs to be involved in waste composition studies and to provide financial assistance to those areas where they aren't conducted. Given the challenges organizing waste audits, the lack of data for many parts of the province and the different methodology noted in the plan, a better system may be for the province to coordinate a rotating series of comprehensive, method-standardized waste composition audits (somewhat like what Washington State does) that are funded by EPR programs collectively with some local government funding as well.

Section 8 Stakeholder Consultation

It is positive that TSBC has an advisory committee. It is hoped that this group can have as much influence as possible. The other methods of engaging with stakeholders are appreciated as well, especially as they are not just during the plan development.

For plan consultation, there should be ads in various media, emails to all program correspondents and any participants from previous consultations, communications to local environmental groups and additional methods to ensure as broad participation as possible.

We hope that this information is helpful in crafting the renewed plan.

Sincerely,
Sue Maxwell
On behalf of Zero Waste BC