

Purpose

The purpose of this compliance bulletin is to provide guidance to retreaders, producers and producer responsibility organizations (PROs) regarding the use of retreading in meeting a producer's resource recovery target.

What is resource recovery?

Under the Tires Regulation, producers must meet mandatory resource recovery targets. Producers are obligated to meet an annual collection target based on the weight of the tires they supply into Ontario. Producers are also obligated to establish and operate a used tire collection system and a used tire management system. Finally, producers are obligated to use their management system to recover, by weight, 85% of the used tires actually collected by the collection system, through any combination of:

- Reuse of used tires without modification
- Processing of used tires with the processed materials being used to make new products or packaging
- Retreading of used tires

What is retreading?

Retreading is the process by which the tread on a used tire is replaced with a new tread. Generally, retreading includes the following steps:

- (a) The used tire is inspected to ensure that it is a suitable candidate for retreading. If not, it is typically sent to a processor.
- (b) The used tire is then prepared for retreading by removing the old tread to produce a casing with a smooth surface for the new tread. The material removed from the used tire is called buffings and is also collected and typically sent to a processor.
- (c) A new tread is then applied to the casing to produce a retreaded tire.

How does retreading count toward a producer's resource recovery target?

A producer can count the entire calculated weight of a retreaded tire towards their resource recovery target, provided that the retreaded tire was previously used and collected in Ontario.

Calculated weight is either the actual weight of the retreaded tire or the weight calculated in accordance with the [Weight Conversion Factors \(Tires\) Registry Procedure](#).

Many retreaders provide retreading services to customers outside of Ontario. Those retreaders will need to have a system of tracking tires and maintaining records that will allow Authority inspectors to confirm that only retreaded tires that were used and collected in Ontario are being counted toward a producer's resource recovery target.

Retreaders will also need to ensure that appropriate records are available for auditors who are retained by producers, or by producer responsibility organizations on their behalf, to verify retreading performance as part of their performance reporting to the Authority. Please refer to the Tire Performance Audit Procedure for further guidance.

Can the weight of the buffings count toward a producer's resource recovery target?

Yes. However, only the buffings from used tires that were used and collected in Ontario can count toward a producer's resource recovery target.