



Review of Weight Conversion Factors for Tires

Consultation Report

October 2019

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Introduction and context

Throughout June 2019, the Authority reviewed and consulted on the existing [Registry Procedure](#) that outlines the weight conversion factors for tires. The procedure addresses the term “calculated weight” in the [Tires Regulation](#) and how it is determined in relation to both new tire supply data and the collection and management of used tires.

The Authority considered the feedback received during the consultation and concluded that changes to the existing procedure are not required at this time. The Authority will continue to work with industry next year to gather data and monitor whether changes are necessary.

Questions about this report can be emailed to: consultations@rpra.ca.

About the Authority

The Authority is a regulatory body created by the Ontario government in November 2016 to enforce the requirements of the [Resource Recovery and Circular Economy Act, 2016 \(RRCEA\)](#) and the [Waste Diversion Transition Act, 2016 \(WTDA\)](#).

The RRCEA establishes a new resource management regime where producers are responsible and accountable for their products and packaging, recovering resources and reducing waste. The WTDA allows for the continuation of waste diversion programs and sets out provisions to wind up those programs as directed by the Minister of the Environment, Conservation and Parks.

About the Weight Conversion Factors for Tires

Every tire producer is required to register with the Authority and report the number of units and weight of tires they have supplied into the Ontario market. This information is used to establish a collection target that must be met by the producer. Beginning in 2020, service providers (collectors, haulers, processors and retreaders) are also required to report to the Authority the number and calculated weight of used tires they retread or resell for reuse in the previous year.

Under the Tires Regulation, producers were given two options for calculating the weight of the 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 unit supply data they had previously submitted to OTS to meet their RPRA reporting requirements.

In February 2018, the Registrar developed a [Registry Procedure](#) that established, for the purposes of the Tires Regulation:

- weight conversion factors that can be used to determine the calculated weight of tires; and
- the minimum weight of a large tire.

The procedure adopted the approach taken by Ontario Tire Stewardship (OTS) that established 18 categories of tires, each with a weight range and a weight conversion factor.

Since OTS's Used Tire Program ended on December 31, 2018, amongst other reasons, it was necessary to review the approach to determining calculated weight at this time. The Authority developed a [discussion paper](#) to further explain the existing procedure and why a review was needed.

Principles for public consultation

The Authority's consultations are guided by the following best practice principles developed by the Organization for Economic Cooperation and Development:

Inclusiveness and openness: Engage broadly with a wide variety of stakeholders, provide clear and understandable information, and make the consultation process accessible, comprehensible and responsive.

Timeliness: Engage stakeholders early before decisions are made and provide regular opportunities for engagement on key program and policy matters.

Accessible and cost effective: Consider a variety of tools and methods to gather feedback that promote efficient and cost-effective consultations.

Balance: Provide opportunities for diverse perspectives and opinions to be heard and considered.

Transparent: Record feedback, report back a summary to stakeholders, and synthesize feedback into programs and policies as appropriate.

Evaluation: Demonstrate the impact of public consultations on program delivery and policy development.

Consultation process

The Authority emailed all tire service providers (collectors, haulers, retreaders and processors) notice of the consultation on May 30, 2019 and all tire producers and PROs on June 6, 2019. A [dedicated page](#) on the Authority's website was created to promote the consultation.

Stakeholders were invited to submit feedback via one of two webinars or via email to consultations@rpra.ca by June 25, 2019.

The Authority also invited tire producers to share their feedback in one-on-one meetings to gain a better understanding of how they currently define tire categories and weight. These meetings took place in September.

The objectives of the webinars and one-on-one meetings were to:

1. Review the existing Registry Procedure that establishes the weight conversion factors for tires
2. Consult with tire registrants on whether there is a need to change the procedure and the options for changing it

The Authority considered the feedback received during the consultation and concluded that changes to the existing procedure are not required at this time. The Authority will continue to work with industry next year to gather data and monitor whether changes are necessary.

What we heard

Feedback from webinars

The Authority hosted two webinars for stakeholders:

- **Webinar for service providers, Thursday, June 13** – 54 people registered and 30 attended.
- **Webinar for producers, Tuesday, June 18** – 44 people registered and 30 attended.

The webinar presentations and recordings can be found [here](#).

Below is a list of all questions received during the webinars and the Authority’s response. The questions were edited for clarity and accuracy. Questions not relevant to this consultation have been excluded.

Webinar for service providers

Question	Response
As a mechanic shop, does this [weight conversion factor] calculation apply to us as we sell used tires?	Anyone that reports the weight of their used tires to PROs, which will then be used to meet resource recovery targets for producers, can use the weight conversion factor calculation. However, there is nothing that obligates you to use the calculation and you can use the actual weight instead.
Scales are not likely to be feasible for re-use tires sales at the collector/hauler level.	<p>Good comment. We have talked to a number of service providers and seen a range of approaches to tracking the weight of tires. We know that processors tend to use the actual weight of tires they’ve separated for reuse.</p> <p>Regarding a hauler’s approach, that would depend on if a hauler is picking up tires and taking them to a site to sort before taking them to a processor. At that point, the question is whether an individual hauler would have the ability to use actual weight or conversion factors.</p> <p>To clarify, we’re not talking about a big scale for a truck to drive across but a regular scale you can put one tire on. This still may be more than what a tire collector wants to do based on their business context, but through these consultations, we’re hoping to gain an understanding of what works.</p>

<p>As a collector from an Auto Body shop, we have never weighed tires nor separated them. Should we be doing that?</p>	<p>Assuming the context of this question is that you're accumulating used tires as a result of the work that you're doing at your auto body shop (e.g. putting on new tires and accumulating used ones, then a hauler comes along and collects those tires and takes them to a processor).</p> <p>Based on this assumption, there is no requirement for a collector to separate tires into categories or weigh the tires.</p>
<p>Is there a possibility to choose what to use? Either actual weight for those who have a scale and want to be as accurate as possible or use a conversion factor based on the actual units diverted. Does it have to be 'only 1 way?'</p>	<p>No, it doesn't have to be only one way. The Tires Regulation states that calculated weight is either actual weight or weight calculated in accordance with the procedure.</p>

Webinar for producers

Question	Response
<p>Can RPRA comment on roughly what % of producers used the conversion factors versus calculating/reporting actual weights?</p>	<p>A number of producers have recognized that the tires they are responsible for are, on average, lighter than the 12.5 kg factor for PLT.</p> <p>We created a compliance bulletin to specifically address this issue. This allowed producers to still rely on their OTS data while using a different process to calculate weights for tires that don't use the 12.5 kg factor, as this would make their collection target too high.</p> <p>A number of producers followed this bulletin – typically used by producers in the smaller tire industry (e.g. motorcycles, off road equipment).</p>
<p>We are a producer that sells trailers and all our light duty tires are well below the 12 kg that you're referring to. All our tires are only 5 kg or so, how do we change this, so we don't use the 12kg?</p>	<p>We have created a compliance bulletin that directly applies to this situation. It includes a procedure that allows you to report the actual weight of your tires, therefore not having to rely on the 12.5 kg factor. A number of producers have already taken advantage of this bulletin.</p> <p>A reason for this conversation today is to determine if there is a better way forward so producers no longer run into this issue.</p>
<p>Are you going to have a weight category for motorcycles, being they are lighter than passenger vehicles?</p>	<p>This is one of the reasons why we are having this consultation – to determine what is the best approach to calculating weight, starting with 2019 supply data (e.g. do we need these categories? Do we need the weight conversion factors? Is there another way to determine calculated weight</p>

	that works for everyone?).
<p>The existing system is fine, as long as we can use the manufacturers specifications and the actual weight of our tires and not the 12.5 kg. Do we have to find and pay for an auditor to verify the weight, and after the first year we do this do we have to do it again every year given that we get our tires from the same suppliers?</p>	<p>Regarding supply data, the actual weight that is reported must be audited. Every year an auditor will have to verify that you used the correct tire specifications (i.e. manufacturers specifications) for the tires you're supplying. This should be a very simple and clean audit process.</p> <p>Once we finish this review of the weight conversion factors, we will begin developing an audit procedure for new tire supply data. During the development and consultation of that procedure, we'd like to answer, "how do we make this audit procedure as simple as possible and administratively easy as possible?".</p> <p>We are not interested in imposing anything more than the bare minimum costs for producers to meet their requirements, and we are prepared to consider what an audit procedure should look like for both large- and small-scale producers. We don't believe in a one-size fits all approach because small producers will most likely be faced with a greater burden, which is not acceptable from our perspective.</p>
<p>The reality is that Collectors will not have scales. Maybe between the Processor and Hauler actual weight can be used. Is there anything preventing maintaining a system whereby some can use a calculated weight based on estimates, and others can use actual where it makes sense?</p>	<p>It's possible to have a system where a calculated weight using conversion factors continues - we want to hear from you about how you think that would work.</p> <p>It's true that it may be difficult for a specific collector to have a scale to weigh tires, but maybe not for others – we'll be sure to take this into account.</p>

Feedback from emailed submissions

Stakeholders emailed their feedback and comments until June 25, 2019. The Authority received five written submissions.

Below is a list of all comments received via email. The comments were edited for clarity and organized into the topics below, based on the questions for consideration provided in the Authority's [discussion paper](#).

Maintenance of current weight conversion factors

- The current categories should be kept, plus an additional category for Lawn Tractors and/or Garden Machines should be added. This category was not covered under the past process.

- It is important to maintain Conversion Factors, and those Factors need to be backed up by industry data for the particular tire types.
- There is absolutely a place for Conversion Factors as it pertains to used tires (and Supplied tires as well), understanding that there are specific nuances depending on the category.
- The greater the flexibility/choice in how to determine the ‘weight’ of the tires (either collected, diverted, processed, etc.) for use towards producer obligation, the better for all stakeholders.
- The “category” model and related weight conversion factor methodology has proven to be efficient and effective and should be kept. Creating two categories for Passenger and Light Truck Tires, based on weight, would help offset the variance within the existing single category.
- The current 18 categories should be kept but there may actually be a need for a few more categories in some areas, particularly at the ‘lower end’ and ‘higher-end’ (i.e. Large/Giant OTR) of the weights (and maybe fewer in the ‘middle’). These categories help stakeholders define and estimate weights of used tires collected in our systems so that we can manage our obligation discharge.
- As you know there are three ways to find out, for each potential obligated product with tire, if the tires are over 1kg: a) by removing the wheels from the product, separating the tires and tube from the rim and weighing manually tires and tube; b) by asking to the manufacturer if they can provide the tire weight. Most of the time they provide the wheel weight, not the tire weight, and; c) by using the weigh conversion factor provided by RPRA. Without tire weight information from manufacturer, weigh conversion factors are the easiest way to determine tire weight.
- We have concerns about changing/removing weight conversion factors due to the fact that vehicle manufacturers track tires for new vehicles based on units not weights, as well as the fact that they have little or no ability to generate weight-based information across the entire population of vehicles delivered to dealers for sale without significant administrative burden, cost and complexity.
- It is important to highlight that a conversion factor for the weight of tires ensures that all “producers” can utilize the same methodology to meet the requirements, minimizing administrative burden. It also provides a level of assurance with respect to data consistency moving forward as the same method is utilized to evaluate the program metrics.

Passenger and light truck or medium truck tire categories

- We recommend that the Authority create a sub-category within the P< category for these small tire producers, instead of changing/removing conversion factors for all

producers.

- There may be a ‘modal’ effect within a category (e.g. PLT may have several supplied weights where tires seem to account (i.e. maybe around 5kg for motorcycle tires, 9.5kg for passenger cars (13-16” tires) and 14 kg for light trucks/larger SUV’s (17-20” tires)).
- The PLT and MT conversion factors should be kept, but perhaps it makes sense to have the PLT category more defined as sub-categories such as “Small Special”, “Small PLT”, “Larger PLT, etc. (or something similar). There is variability in tire sizes/weight that is not accurately captured using an average, thus distorting obligation discharge. There may be a ‘tri-’ or ‘bi-modal’ impact of weights within the categories that could lead to an average weight that is not representative of either ‘subcategory’. The situation is similar for >700 kg tires as well.

Yes, PLT and MT category related factors should be kept. In addition, the 12.5 kg conversion factor for the *On-Road Passenger and Light Truck Tires* as well as the 10 kg conversion factor for the *Off the road Pneumatic Tires - 1 to ≤ 15 kg* categories are too high, which mean the calculated collection target would be too high. The following subcategories should be added:

Tire Category	Tire Categories Description		Weight conversion factor (kg)
1a	On-Road Passenger and Light Truck Tires	1 to ≤ 5 kg	3
1b	On-Road Passenger and Light Truck Tires	5 to ≤ 10 kg	7.5
1c	On-Road Passenger and Light Truck Tires	10 to ≤ 15kg	12.5
3a	Off the road Pneumatic Tires	1 to ≤ 5 kg	3
3b	Off the road Pneumatic Tires	5 to ≤ 10 kg	7.5
3c	Off the road Pneumatic Tires	10 to ≤ 15kg	12.5

Tire manufacturer specifications

- The producer should have the flexibility to utilize weight as per the manufacturer (if available) or the weight conversion factors.
- On a yearly tire supply data basis, producers/collectors/haulers/processors should have the option to use either the weight established in tire manufacturer specifications or weight conversion factors but cannot combine methods within a calendar year.
- The weight established in tire manufacturer specifications should be used when available.

Audits

- Properly reporting the number of tires and the weight calculated using the manufacturer specifications would be best for audit purposes.
- Regarding the audits, it is not appropriate to suggest that actual weights would make an audit easier and would be less costly. Audits costs are related to the producers' access to information, volume of data and overall complexity of the data to be reviewed. Audits are taken seriously by our members and represent a new cost to businesses in Ontario. It is essential that the Authority consider these issues and seek to ensure that the audit requirements are reasonable so that costs are contained given the government focus on burden reduction.
- We would need to engage an auditor to determine the easiest verification approach for them, but both (i.e. reporting tires in the existing 18 categories or reporting the number of tires and the actual weight of used tires that are retreaded or sold for reuse) have their own issues. 'Proper reporting' would imply something more would be required than the tires being reported at the time of sale.
- The RPRA should employ the same internal audit processes as previously used by OTS, even if it means raising the registration fees. This would eliminate the need for the massive amounts of mandatory audits required at the producer/collector/hauler/processor level. That being noted, it would be easier for an auditor to verify that tires are properly reported into existing categories. As this question is worded, the auditor would not have to verify the number of tires or weight, just that the tires are being properly reported into a category.
- The number of tires and the weight calculated using the manufacturer specifications (or weight conversion factors) is the data that should be audited.
- Since annual collection targets are based on the tire weight reported, the number of tires and the methodology used to determine the weight of tire should be audited.

Retreading and reuse

- Allow for flexibility by the stakeholder to choose how the weight of used tires sold for reuse and/or retreaded tires should be determined, based on what is most relevant/more efficient for them (e.g. If the stakeholder (i.e. collector) has a scale, they can weigh it or he stakeholder (i.e. small collector) can document 'X' Small PLT's at a conversion factor, 'Y' Larger PLT's at a conversion factor).
- On a yearly tire supply data basis, producers/collectors/haulers/processors should have the option to use either the actual weight or use a RPRA supplied "Used Tire" weight conversion factor, possibly based on a percentage of the "New Tire" weight conversion factor. Methods cannot be combined within a calendar year.
- The weight of used tires sold for reuse should be determined by using a % rebate on the weight of the new tires.

Timelines

- Changes should be applied on a go forward basis (i.e. 2020).
- Changes should be applied to 2020 supply data, **unless** the reporting would be made easier for Producers for 2019 (i.e. greater flexibility/ease to calculate their supply data).
- Changes should apply in 2019. Every producer/collector/hauler/processor was aware they were still required to report 2019 tire supply data, regardless of the RPRA takeover, or changes to the methodology, and as such should be keeping a record of some kind.
- Changes should apply in 2019, since data from 2019 and beyond will be new data, not previously submitted, and will require an audit report in 2021.
- Timelines need to be discussed more in light of the Supply Data Audit consultation, as this issue will have a significant impact on large Auto OEM's and specialty equipment OEM's.
- Pending the analysis of the input RPRA receives during this consultation, it is important to mention that any changes to the information submitted to the Authority cannot be put in place without a minimum amount of notice. Many require sufficient lead time to plan and manage changes to their internal systems and advise their management and others that may be involved.
- Requiring producers to retroactively collect data infers that the information is easily determined, which is not the case for our members who are important producers in the P< category. If changes are considered, they need to be on a going forward basis and not applied retroactively.

General

- We appreciate the approach taken by RPRA to engage with stakeholders to consult on the efficacy of conversion factors for used tires.
- We are extremely concerned with the speed of this consultation due to its high importance and impact on producers. The time provided was insufficient as those affected are not able to assess the implications in a reasonable time frame and provide meaningful input. The Authority needs to revisit their consultation approach and ensure that sufficient time is provided for input for such an important issue especially during this period of time in the year (as absences are expected).
- Further discussion is needed before any changes are made to the procedure. The Authority needs to engage more directly with a variety of producers and PROs to obtain information and data to objectively assess if changes are truly needed as well as consider the impact on all parties from an administrative, cost and data quality perspective.

Feedback from one-on-one meetings

The Authority hosted five one-on-one meetings with two groups of tire producers – large tire manufacturers and vehicle manufacturers – throughout September to gain a better understanding of how they currently define tire categories and weight.

Below is a summary of comments received during the meetings. Comments not relevant to this consultation have been excluded.

- Vehicle manufacturers are strongly against using the actual weight of tires. They prefer to use the current weight conversion factors because it is much easier to report. Tracking down the actual weight of a new tire is difficult because any brand or tire specs can be used on a new car.
- Large tire manufacturers believe the OTS weight categories are still accurate.
- Large tire manufacturers don't have a clear definition of each tire category; however, they use an industry yearbook that includes all tires and places them into categories (e.g. PLT, MT, agricultural, industrial, SOTR, LOTR).
- Currently some tire manufacturers publish the actual weight of their tires for the public to use, some only disclose the weight information to their dealers; however, most have no problem disclosing the actual weight information to the public.

Consultation evaluation

Following each of the two consultation webinars, participants were invited to complete a short feedback survey. The following charts show how participants rated the consultation process.

