

OTS Policy Memo Regarding Support Required for Used Tire Volumes

Dear OTS-Registered Collectors,

Through discussions with Collectors Ontario Tire Stewardship (OTS) has become aware of some confusion centered around what information a Collector may be required to provide in order to validate the reasonableness of the quantities of used tires it has handled, regardless of whether this used tire was culled for reuse or picked up by an OTS registered Hauler. This Policy Memo is intended to provide clarity regarding Collectors obligations in this regard, consistent with the responsibilities of the Collector under the Agreement with OTS.

With Respect to Used Tires Collectors obligations under the Agreement, including but not limited to Article 2.1(b) and (l), with OTS are to:

- Report to OTS on all quantities of Used Tires in the manner specified by OTS;
- Maintain detailed information regarding the Collectors handling of used tires;
- Provide information demonstrating the origin of all used tires handled by the Collector;
- Not transfer, sell or otherwise send used tires for any final purpose that is not an approved purpose under the Used Tires Program.

Collectors have a variety of means by which to support the reasonableness of the quantities of used tires reported as originating from the Collectors activities, and each Collector business type may provide different forms of information that meet the requirements of OTS. For example these may include but not be limited to:

- Reports showing quantities of new tires sold and tire changes and/or installations (ie. Sales and Purchase Reports for applicable periods);
- Vehicle Identification Number logs; (VIN registry submitted to MTO);
- Registry of tire drop-offs by residents (such as those maintained at a public recycling depot); refer to Section 5.1.2 Participant Cooperation in the Collector Guidebook for a sample registry form);
- Vehicle service logs and tire sales (such as those maintained by a vehicle dealer).

OTS reserves the right to request information demonstrating the in-province origin of the used tires as applicable.

In instances where the quantity of used tires received by the Collector exceed that which can be supported by these types of information (for example in the case of used tire drop-offs) the Collector should maintain a **drop-off log** to support the reasonableness of these quantities. OTS has provided a sample log form in the Collector Guidebook that can be found at <http://rethinktires.ca/program-participants/collector/resources>.

OTS would like to remind Collectors that it is the obligation of a stakeholder under the relevant Agreement with OTS to be able to provide the appropriate information on request from OTS, including in instances where the Collector has received used tires from a Sub-Collector. In the absence of

supporting information OTS may reject the payment of Collection Allowance and potentially all other incentives paid on the used tires that cannot be supported by the Collector. OTS may seek to recover these amounts from the Collector and take further actions contemplated under the Agreement between OTS and the Collector that may include suspension or termination of the Collector registration under the Used Tire Program.

Stakeholders with questions regarding this or any other Used Tires Program policy or process are invited to contact OTS at info@rethinktires.ca or by phone at 888-687-2202. We look forward to continuing to work with you to divert Ontario's used tires to high-value recycled end-uses.

Regards,

Stephen Gluchowski
Director of Operations