

Tire Stewardship Plan for Connecticut

Connecticut Tire Stewardship LLC

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Regulatory Basis for this Plan

This Connecticut Tire Stewardship Plan (the “Plan”) is filed by Connecticut Tire Stewardship (“CTS”) with the Connecticut Department of Energy and Environmental Protection (“DEEP”) pursuant to the requirements of [Conn. Gen. Stat. Ann. § 22a-905i](#) (the “Act”) for management of Discarded Tires in Connecticut (the “State”). Capitalized terms used in this Plan are either defined in the Plan or in the Act.

This Plan describes how CTS will provide a statewide Tire Stewardship Program for Discarded Tires as required by the Act.

Under the Act, each Producer, or such Producer’s designee, must join a Tire Stewardship Organization (such as CTS, the submitter of this Plan). The Tire Stewardship Organization must submit a plan for approval by the Commissioner of Energy and Environmental Protection (the “Commissioner”) to establish a statewide Tire Stewardship Program. In accordance with subsection (r) of the Act, any Producer who does not participate in a Tire Stewardship Program authorized under the Act shall not Supply Tires in the State.

This Plan describes the intended Program for Discarded Tires in the context of the approval criteria set forth in subsections (b) to (d) of the Act. Two years after implementation of the Program, CTS will submit updated performance goals to the Commissioner that are based on the experience of the Program during the first two years of operation.

In accordance with subsection (h), by October fifteenth of each year, CTS will submit an annual report to the Commissioner. The report will include all reporting criteria as required by the Act. In accordance with Act section (d), CTS will maintain Program records for a period of not less than three years.

Text boxes throughout this Plan include sections of the Act to help guide the structure of this Plan and provide regulatory context.

Tire Stewardship Organization

Following the enactment of the Act, US Tire Stewardship (“USTS”) was formed as a 501(c)(3). USTS then formed CTS LLC to operate the Connecticut Program.

CTS was formed for the purpose of promoting public awareness of the importance of Tire Recycling, facilitating Recycling of Tires generated in the State, and providing educational information in the field of Tire Recycling.

USTS is governed by a board of directors comprised of nine directors representing obligated Producers.

CTS is governed by a board of three directors comprised of directors representing obligated Producers.

A list of current directors will be maintained on the Program website.

CTS will oversee all aspects of its Program, including:

- Developing and implementing stakeholder outreach efforts
- Coordinating outreach to and participation of Producers of Tires sold in the State as appropriate
- Establishing a statewide collection system utilizing Covered Entities
- Contracting with service providers to transport and properly recycle Discarded Tires
- Providing suitable storage containers for Discarded Tires, as required by the Act, throughout the collection system
- Establishing Performance Goals
- Assisting in market development, as needed, to achieve Performance Goals
- Developing a fee structure to fund all Program activities

Definitions

Definitions in *italics* were defined the Act and govern this Program. Additional definitions in regular text have been added for further context.

“Collection rate” means the tons of tires collected for program management divided by the tons of tires sold.

"Covered entity" means any permitted transfer station, tire retailer, car dealership, automotive garage, private or public sector fleet maintenance garage or other location identified in the approved stewardship plan.

"Discarded tire" means any whole tire or whole tire on a rim that a consumer discarded or abandoned, or intends to discard or abandon.

“Diversion rate” mean the tons of tires recycled, used as tire derived fuel or incinerated in another state divided by the tons collected.

"Performance goals" means annual outcomes proposed by the tire stewardship organization in the tire stewardship plan that measure the performance of the program including tire collection and diversion rates, economic and environmental benefits, beneficial recycling usages and targets, public education and participation and any other specified goal of such program.

“Processor” is an entity that processes scrap tires into products or for use as energy recovery.

"Producer" means, with respect to new tires marketed to consumers in the state separately from any vehicle or equipment: (A) If the brand holder of the tire is a resident of the United States, the tire manufacturer; (B) if there is no person described in subparagraph (A) of this subdivision, any person who is not the manufacturer of the tire but who is the owner or licensee of a trademark under which the tire is supplied in this state, whether or not the trademark is registered; (C) if there is no person described in subparagraph (B) of this subdivision, any person who imports any tire into the state for supply to a consumer; or (D) if there is no person described in subparagraph (C) of this subdivision, the retailer who supplies the tire to a consumer.

"Recycling" means any process in which discarded tire components and by-products may lose their original identity or form as they are transformed into new, usable or marketable materials.

"Recycling" may include the use of tires or processed materials that are incinerated or used as a fuel or fuel supplement, provided such incineration does not occur in this state.

"Recycling rate" means the tons of tires recycled divided by the tons collected.

"Retailer" means any person who supplies a tire to a consumer, including any person who supplies a tire through vehicle service or who supplies a tire through an Internet transaction to be delivered to a consumer in this state.

"Supply" means the transfer of title of a tire for consideration, including, but not limited to, the use of a sales outlet, catalog, Internet web site or similar electronic means.

"Tire" means a product composed primarily of rubber that is mounted on the wheels of any type of passenger or commercial on-road or off-road motorized vehicle, including passenger vehicles, motorcycles, trucks, buses, mobile homes, trailers, noncommercial aircraft and earthmoving, road building, mining, logging, agricultural, industrial and other vehicles and that provides mobility. "Tire" does not include any tire from any toy, bicycle, commercial aircraft or personal mobility device.

"Tire derived fuel" is a fuel made of shredded or whole scrap tire that can be mixed with other fuels, such as coal, wood or chemical wastes, to be burned in industrial settings. It is further defined in ASTM standards.

"Tire derived products" are usable materials produced from the chemical or physical processing of tires. Some of the typical uses of TDP include green building construction, playground surfacing, landscaping, rubber mats, tire derived aggregate, and rubber modified asphalt.

"Tire stewardship organization" means an organization created or selected by a producer or producers that designs, submits and implements a tire stewardship plan.

"Tire stewardship program" or "program" means the state-wide program described in this section and implemented pursuant to an approved tire stewardship plan.

Acronyms

USTS – US Tire Stewardship

CTS – Connecticut Tire Stewardship

DEEP – Connecticut Department of Energy & Environmental Protection

TSO – Tire Stewardship Organization

Participating Producers

This text box is provided to ensure the following section of the Act outlined in the text box below is met.

Regulatory Requirements

Section (c) Any plan submitted pursuant to subsection (b) of this section shall:

(1) Identify each producer participating in the program.

Producers that have joined this Program to date, include the following:

- Bridgestone Americas, Inc.
- Continental Tire the Americas, LLC
- Double Coin Tires
- Giti Tire (USA) Ltd.
- The Goodyear Tire & Rubber Company
- Hankook Tire America Corp
- Kumho Tire U.S.A., Inc.
- Maxxis International – USA
- Michelin North America, Inc.
- Nokian Tyres, Inc.
- Pirelli Tire North America
- Sailun Tire Americas
- Sumitomo Rubber Industries
- Toyo Tire Holdings of Americas Inc.
- Yokohama Tire Corporation

Appendix A provides a listing of Producers that have joined CTS and the Tire brands that are manufactured or imported by these Producers.

CTS is open to all Producers seeking to meet their compliance obligations under the Act.

The number of CTS participants is anticipated to grow given that the Act requires Producers to participate in an authorized Tire Stewardship Organization in order to continue Supplying Tires within the State. A list of participating Producers will be maintained on the Program website, and it will be updated periodically.

Collection and Processing

This text box is provided to ensure the following sections of the Act outlined in the text box below are met.

Regulatory Requirements

Section (b)... Such tire stewardship program shall, to the extent it is technologically feasible and economically practical:

- (1) Establish and manage a state-wide collection system utilizing covered entities.*
- (2) Provide access to the collection system to the public, free of charge, for the drop-off of discarded tires.*
- (3) Ensure discarded tires are picked up from the collection system and transported for recycling.*
- (4) Ensure all discarded tires collected in the collection system are resold or recycled.*
- (5) Provide suitable storage containers for tires, as required, throughout the collection system.*
- (9) Ensure that all collectors and processors are qualified to perform their respective functions pursuant to such program and are in substantial compliance with the laws and regulations of any state in which such collector or processor operates, including, but not limited to, any financial assurance and closure plan requirements.*

Section (c) Any plan submitted pursuant to subsection (b) of this section shall:

- (4) Describe the industry transition timeline that is required to achieve such performance goals and how the plan will, to the greatest extent economically feasible, utilize existing service providers and infrastructure in the state.*
- (5) Identify proposed facilities to be used by the program in the collection system and discarded tire transportation and recycling activities.*

Collection System

CTS is working to develop a statewide collection system utilizing Covered Entities to meet the Act's requirements. The public may access this collection system free of charge by visiting any participating Covered Entity. As a part of the planning process, CTS has reached out to Covered Entities in the State, including any permitted transfer station, Retailer, car dealership, automotive garage, private or public sector fleet maintenance garage, as well as others such as salvage yards, automotive dismantlers and the naval submarine base, to determine which organizations and entities intend to participate in the Program¹. CTS will continue ongoing efforts to engage with Covered Entities and offer collection services.

¹ For simplicity, certain activities undertaken to support Program development while CTS was being formed are referred to in this Plan as CTS activities.

Initial outreach was conducted via a survey to solicit general interest in Program participation. This effort involved extensive research on Covered Entities in the State and included follow-up phone calls. The surveys were conducted from April 2024 to August 2024. The survey also served as an informational tool to spread awareness of both the Act and the CTS Program.

Pursuant to CTS preliminary outreach efforts, it is expected that most local government sites will participate as Covered Entities collecting Tires from the public and receiving service from the CTS Program. In addition to this, the Program will also service the Naval Submarine Based in Groton. It is also anticipated that other entities such as scrap yards and fleets are likely to participate as Covered Entities. While responses from non-government Covered Entities have not been as robust, several sites, such as smaller Retailers, have expressed interest in Program services. The Program may also consider alternative collection options. This may include consolidated drop off sites to accommodate larger volumes of Tires or on site pick up for large volumes of Tires.

The Act does not require entities that provide Tire collection services to participate in a Tire Stewardship Program, nor does it obligate any Covered Entity to collect Tires. The Act also prohibits entities participating in the Program from charging for the receipt of Discarded Tires upon Program implementation. The Act does not prohibit the collection of a Tire Recycling/disposal charge unless the Covered Entity joins a Tire Stewardship Organization.

Given the current Tire management practices of Retailers in Connecticut, it is not anticipated that many Retailers will voluntarily participate in the Program as Covered Entities. Many Retailers charge a Tire disposal fee when they replace a consumer's Tires in the State. The fee charged is often higher than the direct cost of managing those Tires, which can allow Retailers to generate cash flow from Tire collection. Because the Act only prohibits such fees if a Covered Entity participates in a Tire Stewardship Program, there may be a financial incentive for Retailers to continue current practices and forgo Program participation.

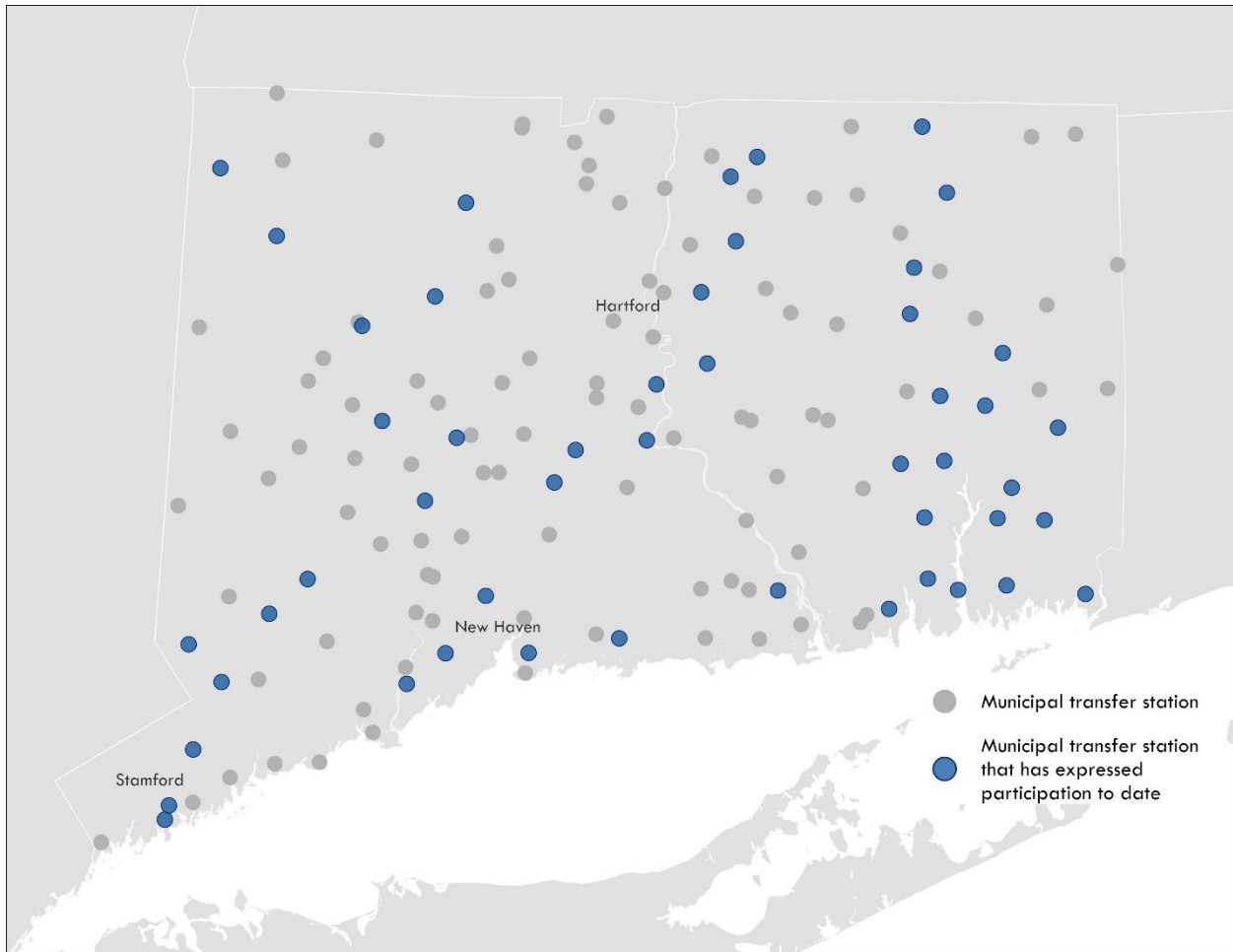
CTS will continue to pursue outreach efforts to Covered Entities, as the program strives towards management of Tires in the State consistent with legislative intentions.

Program Access

Within the first two years of Plan implementation, CTS aims to capture 95% of the State's population within a 15-mile radius of a participating Covered Entity that offers free residential drop off. To track progress towards this performance goal, CTS will maintain a regularly updated map on its website of all active Covered Entities participating in the Program, clearly delineating those that accept Discarded Tires from the public. CTS will periodically conduct geospatial analysis to assess the percentage of the population with access to Covered Entities and report the most-up to date metric on its website.

Figure 1 maps the locations of all municipal transfer stations in Connecticut and highlights those that have expressed interest to date in participation as a Covered Entity serviced by CTS. Between Plan submission and Program implementation, the number of participating Covered Entities is anticipated to grow as Program awareness increases.

Figure 1. Municipal Transfer Stations in Connecticut and Expressions of interest in Tire collection to date.



Given the preliminary survey results, CTS anticipates that most municipal transfer sites will serve as Covered Entities. With the sites that have expressed interest to date, 99% of the population is located within a 15-mile radius of a participating Covered Entity.

Collection Sites

To collect Discarded Tires in a safe manner, Covered Entities collecting Discarded Tires as part of the CTS Program must be in compliance with, as applicable, DEEP Solid Waste Management Regulations ([Section 22a-209-8](#)), which specify handling requirements for the storage, disposal or processing of waste Tires.

CTS will require participating Covered Entities to cover Discarded Tires to ensure they are protected from pooling water and stored in a location that is locked or protected.

Contracts will require that Covered Entities are qualified to collect Discarded Tires and are in compliance with applicable laws and regulations.

Covered Entities that wish to participate in Program collection as a Covered Entity but are not currently collecting Discarded Tires will be evaluated on a case-by-case basis to determine the most appropriate Discarded Tire storage option.

The CTS Program will consider the best options for storage at each Covered Entity based on criteria such as size, security, history, expected volumes, staffing, handling equipment, and transportation distance. CTS may consider permanent structures that meet industry's best management practices, or alternatives such as box trailers, or other modular shipping containers.

Storage Containers

Many Covered Entities will already have storage containers and systems in place, given current practices around Tire collection and Recycling in the State. CTS will work to ensure that any existing containers and collection systems are compliant with applicable laws and regulations. CTS will also provide suitable storage containers for Tires to the extent that it is technologically feasible and economically practical as required by the Act. CTS does not anticipate any challenges to providing the necessary infrastructure for the collection of Discarded Tires, such as paying for leased collection containers at Covered Entity facilities where required.

Transportation

Tires will be collected from Covered Entities by approved and reputable transporters who will collect the Tires and deliver them to approved, environmentally responsible Tire processing centers.

Contracts will require that transporters are qualified to transport Tires and are in compliance with the applicable laws and regulations of any state in which such transporter operates.

A collection schedule will be arranged with the transporter to provide timely removal of Tires. Transporters will provide a manifest or shipping document for each collection that identifies the date, quantity of Tires collected, as well as collection and drop off locations. Transporters will be required to collect and deliver the Tires in compliance with all applicable laws, regulations, and other legal requirements.

The Program intends to engage and establish contracts with collection service providers currently operating in the State with the goal of minimizing impact to local businesses during Program transition. As the Program matures, CTS will further refine expectations on the end fate of Tires to align with the CT Waste Management Hierarchy as outlined in the Market Development Section of this report.

Collector and Transportation Service Provider Agreements

CTS will enter into agreements with Covered Entities, in their role as Tire collectors, and with the service providers that will transport Tires from the Covered Entity sites to Tire processing facilities.

Collection Site Agreements:

Covered Entities that express interest in Program will be offered collection site contracts. The contracts will outline expectations for participation in the Program including on-site storage requirements, free collection from the public, and service frequency. Contracts will also require that Covered Entities operate in compliance with all applicable laws, regulations, and other legal requirements.

Covered Entity contracts may allow for reasonable restrictions on the acceptance of Tires. Restrictions may include the Tires by number, source or condition in accordance with the Act. For

example, some smaller Covered Entity sites may need to limit the amount of Tires collected per person per day to account for space. Tires should also be free of packed mud or debris at the time of collection.

Frequency of collection service will be primarily based on the number of Tires generated at a Covered Entity. CTS will aim to collect Tires when at least 50 Discarded Tires have been accumulated consistent with best management practices among other Tire Stewardship Organizations and current procedures among State service providers. Under special circumstances, collection may be provided for smaller quantities either at the request of a Covered Entity or offered by the Program for increased efficiency (e.g., collection from multiple low-volume Covered Entities in a geographic zone, or on a pick-up route when a collection service provider is not at capacity).

Transportation Agreements:

The Program intends to solicit interest from transportation service providers with a formal request for expressions of interest during program implementation. Following this preliminary step, the Program will establish agreements with all selected service providers. The agreements will define key parameters such as where Tires are collected and delivered, the quantity and/or weight of Tires, payment terms, etc.

In Connecticut, Tire Processors often also function as Tire transporters, however, there are several other service providers that currently transport Tires out of state for processing. CTS will engage with service providers directly to require that Tires collected from Covered Entities participating in the Program are properly managed.

Improperly Managed Tires

It is believed that the primary driver behind illegally dumped Tires is often cost avoidance, whether by individuals or businesses. CTS's education campaign will work to combat the illegal dumping of Tires by enhancing consumer awareness of the Program's network of Covered Entities with an emphasis on free disposal provided by the Program.

CTS will work closely with both Covered Entities and service providers, property owners and municipalities on a case-by-case basis to support the proper collection and management of improperly managed Tires. The Program website will provide resources for local governments, DEEP, or members of the public to report illegal Tire dump sites.

CTS will also report on illegally dumped Tires that are reported to and supported by the Program. It is anticipated that increased awareness, combined with the free collection system throughout the State should decrease the amount of illegally dumped Tires.

Processing

In Connecticut, Volume Reduction Plants must conform to the requirements of Section 22a-209-10 of the Regulations of Connecticut State Agencies. DEEP also requires that Tire processing facilities report the origin of the waste received, amounts received, amounts recycled and disposed, and outbound material destinations on a quarterly basis.² DEEP does not track the transport of Tires that are not received at a Volume Reduction Plants in the State. There is no prohibition against the

² [Recycling and Disposal of Scrap Tires \(ct.gov\)](#)

shipment of Tires across state lines, and transporters/collection service providers do not need to be licensed.

CTS intends to contract with Tire processing facilities to ensure that Tires collected by service providers, from Covered Entities, are handled in accordance with the Act's requirements and ensure that Processors are in compliance with the applicable laws and regulations of any state in which they operate, including any financial assurance and closure plan requirements.

CTS will require each processing facility that is participating in the Program to sign a Processor Agreement that outlines expectations for participation including scheduled reporting on Tires received, data on the management of Tires, and the end fate of processed Tires.

At a minimum, the Program will seek to develop agreements with the following Connecticut Tire Processors:

- CRM Co. LLC, Plainfield, CT
- Don Stevens Tire Company, Southington, CT
- Liberty Tire Recycling, West Haven, CT

This list may be refined between Program Plan submission and implementation, as CTS continues outreach efforts. A list of all Program Processors will be regularly updated on the Program website and included in annual reports.

Given the lack of baseline data on the movement of end-of-life Tires in the State, CTS will map the flow of Tires from Covered Entities, transporters, and Processors that are engaged in the Program in the first two years of Program implementation.

The Program will report data on the end fate of Tires. The Program will make adjustments during the first two years of operations to collection should any Tires from the State not be managed in a manner that is considered resold or recycled in accordance with the Act. Where there are opportunities for improvement, CTS may consider the use of incentivizes to Processors to ensure Connecticut Tires are directed towards higher value end uses in accordance with the State's Waste Management Hierarchy (see the Market Development Section for more details).

Promotion and Education

This text box is provided to ensure the following sections of the Act outlined in the text box below are met.

Regulatory Requirements

Section (b) Such tire stewardship program shall, to the extent it is technologically feasible and economically practical:

Implement public promotion and education about the program.

Section (c) Any plan submitted pursuant to subsection (b) of this section shall:

- (7) Include a description of the public education program that will be used to promote consumer knowledge of such program.*

According to a 2023 Consumer Reports survey, the most common reason for buying replacement Tires is simply normal Tire wear. Of those surveyed, the majority of consumers reported purchasing Tires at major retail chains, independently owned Tire stores, and car dealerships.³ Additionally, most consumers reported leaving their old Tires at the Retail store where they purchased their new Tires.

The Program will develop education and outreach materials that increase the awareness of the no-cost return Program, enhance public understanding of the benefits of Tire collection and Recycling, and work to combat illegal dumping. Where feasible, CTS will partner with other stewardship organizations in the State on outreach efforts as well as consumer awareness surveys.

Outreach & Education to Covered Entities

Upon initial Program implementation, each participating Covered Entity will be notified of an optional webinar for new participants. Covered Entities that begin participating after the initial Program implementation will be invited to view the recording of the webinar.

This educational webinar will include an introduction to consumer-facing education materials as well as information regarding the reuse and Recycling of Tires, the proper handling and storage of Tires at Covered Entities, how Tires will be picked up from the Covered Entities and transported for Recycling, and the process for requesting additional Tire pick-ups under special circumstances.

CTS will also develop a question-and-answer document for Covered Entities that will be kept active on the Program's website.

CTS will provide all Covered Entities with educational materials to inform consumers throughout the State about end-of-life Recycling options. Educational materials will include a link or QR code to the Program webpage that includes return locations and contact information, an explanation of the Program, examples of products made from Connecticut's end-of-life Tires, and proper disposal options for Tires in the State.

In an effort to minimize waste, the Program will distribute many consumer-facing educational materials through digital means including the Program website, social media platforms, and local news coverage for special events. However, the Program will also develop physical materials as needed, such as brochures, flyers, palm cards, countertop displays, scripts for Covered Entities, and, for e-commerce, the content that can be displayed on websites and in after-purchase e-mails. Materials will be available for download from the Program website, and printed copies available upon request.

CTS will seek opportunities to collaborate with local governments, other stewardship organizations, and any other stakeholder on activities that promote Program awareness.

Outreach & Education to Consumers

For participating Covered Entities where new Tires are purchased, CTS will provide scripts for employees regarding the CTS Program and the proper disposal of Tires. This information will also

³ <https://www.consumerreports.org/cars/tire-buying-maintenance/the-driving-forces-behind-tire-purchases-revealed-a1000798673/>

be included in the education materials delivered to e-commerce entities for delivery with online purchases of Tires.

All educational materials will be created by CTS, or a designated third-party, and updated as needed.

In addition to consumer education materials provided to Covered Entities, CTS will also provide a suite of education materials that local governments can deliver to residents. CTS will recommend that messaging be repetitive (8-10 rounds of outreach) in order to effectively change resident behavior. Messaging materials will include primarily electronic media such as social media posts, information to share on municipal websites, etc. CTS will also look to partner with municipalities to provide postcards and bill inserts (that can be delivered with trash/Recycling and other utility bills sent by the local government).

CTS will use a variety of methods to raise consumer awareness of the Program including:

- A website
- Facebook, X, or other social media
- Media attention from special events participation
- Information available through participating Covered Entities such as,
 - Large sign display
 - QR Codes
 - Countertop displays
 - Brochures
 - FAQs
 - Employee scripts

CTS will also engage in special events that provide for greater public engagement. Events may include partnering with other stewardship programs, a table or booth, and program promotional materials.

After each new Program Plan approval, the suite of educational materials provided to Covered Entities and local governments may be reviewed and if necessary revised to account for new information. If the materials are updated, CTS will notify Covered Entities and local governments and provide updated materials.

Market Development

This text box is provided to ensure the following sections of the Act outlined in the text box below are met.

Regulatory Requirements

Section (b) Such tire stewardship program shall, to the extent it is technologically feasible and economically practical:

(7) Assist in market development, as needed, to achieve performance goals.

CTS will assist in market development efforts, as needed, to achieve Performance Goals as set out in this Plan.

During Program implementation, to the extent practicable, CTS will track Tires sold into the State by participating Producers as well as Discarded Tires collected and managed by CTS. CTS will research and analyze opportunities for market development that drive the development of Program Performance Goals. This research may be in collaboration with the Tire Recycling Foundation or other parties, such as stewardship programs in other countries, engaged in Tire research. CTS will engage with stakeholders in establishing goals and identifying area where assistance is needed.

CTS preliminary outreach suggests that there is existing infrastructure in the State to recycle higher volumes of Tires. Some local Processors are bringing Tires in from out of State for processing. Connecticut Processors report that used Tire product markets are open to taking more materials and have the capacity to handle all Discarded Tires generated in the State.

Preliminary findings also reveal some local collection service providers are transporting Tires out of State. These Tires are either recycled or used as Tire Derived Fuel in nearby states. While the definition of 'Recycling' in the Act, 'may include the use of Tires or processed materials that are incinerated or used as a fuel or fuel supplement, provided such incineration does not occur in this state', CTS will work with the existing system to assess management opportunities for Tires generated in Connecticut with the goal of maximizing circular and sustainable end-of-life Tire Recycling in accordance with the Act.

CTS will work to promote Tire management in the Program consistent with Connecticut's 2016 Comprehensive Materials Management Strategy⁴ (Figure 2). This strategy aims to transform solid waste management into a materials economy, focusing on the value of materials throughout their lifecycle. The strategy references the US Environmental Protection Agency's Waste Management Hierarchy⁵. The hierarchy is a structured approach to managing solid waste and emphasizing the most environmentally sound methods first.

⁴ [Final Adopted Comprehensive Materials Management Strategy, Revised 12-14-2016 \(ct.gov\)](#)

⁵ <https://www.epa.gov/smm/sustainable-materials-management-non-hazardous-materials-and-waste-management-hierarchy>

Figure 2. Connecticut's 2016 Comprehensive Materials Management Strategy



CTS has undertaken preliminary efforts to map the flow of Tires in the State through outreach to local governments, Retailers, and other Covered Entities, as well as collection service providers and Processors (Figure 3). As the Program is implemented, data gathering will be refined accounting for all Tires managed by the Program.

To guide market development and enhance the overall management of Tires, the Program will reflect the following principles:

- **Reuse:** Recognizing that some Tires are diverted from the volume of Discarded Tires and sold for reuse before or after retreading, CTS does not intend to interfere with the existing marketplace nor take on the ownership or liability of such practices. Instead, CTS will encourage best practices in support of the waste management hierarchy. While the Program is required to report on initial Tire sale and end of life volumes, CTS will strive to work with those re-treading Tires to report data to the Program to account for this activity in accordance with the waste management hierarchy.
- **Source Reduction:** CTS will support additional source reduction efforts by providing educational materials and messaging on proper storage practices for Tires not currently on the vehicle (e.g., winter Tires), as well as proper maintenance of Tires on vehicles to extend the life of the Tire (e.g., proper Tire inflation, rotation, and maintenance).
- **Recycling / Energy Recovery:** The Program will explore financial incentives to Processors in alignment with the State's waste management hierarchy. For example, Tires that are recycled into new Tire Derived Products may receive a higher incentive payment than those that are currently used as Tire Derived Fuel.

- **Landfill Disposal and Incineration:** While the Program anticipates low levels of landfilling and no incineration, the Program will document any such instance along with justification as to why the materials could not be managed at a higher level of the hierarchy.

Ongoing Tire Producer Initiatives

Within the tire industry there are several active initiatives to improve the management of tire in the U.S. This section highlights some of the successes and commitments of the industry in this space. CTS may work with the Tire Recycling Foundation (TRF) or other partners on market development and performance goals.

USTMA members share a common vision on sustainability which includes, promoting Tire safety, advancing worker safety, reducing greenhouse gas emissions throughout a Tire's useful life, improving environmental footprints over time, minimizing the health and environmental impacts of Tire materials, and ensuring end-of-life Tires enter sustainable markets.

Specifically, USTMA members share the goal that all end-of-life Tires enter sustainable and circular end-use markets. USTMA's 2023 End-of-Life Tire Market Summary Report measures progress toward meeting the sector's sustainability vision.

USTMA released the [2023 End-of-Life Tire Management Report](#) on October 24, 2024. This report shows a recent 10.5% increase in the overall utilization of end-of-life Tires in the U.S. with 79% of end-of-life Tires being consumed by end-use markets.

The [TRF](#), is a nonprofit whose mission is to identify, support, and promote economically viable and environmentally sustainable solutions for Recycling Tires by convening stakeholders, facilitating fundraising for innovation, supporting research and development, identifying best practices, and providing education and technical assistance as needed across the U.S. TRF is assuming a vital role in advancing the Tire circular economy by forging coalitions spanning both the private sector, including Tire Producers, and the public sector of regulators, researchers, and environmental advocates.

Through grants and partnerships, TRF supports the research and demonstration of emerging and growing end markets for end-of-life Tires – rubber-modified asphalt, micronized rubber powder, and recovered black carbon among them – that could potentially utilize 100% of the end-of-life Tires generated in the U.S. TRF acts as a funding portal for donations, gifts, member fees, and grants from a variety of sources seeking to support targeted critical research and projects that address voids in technical data, materials science, conversion technologies, and multi-party collaborations spanning the nationwide Tire Recycling supply chain.

Financing

This text box is provided to ensure the following sections of the Act outlined in the text box below are met.

Regulatory Requirements

Section (b) Such tire stewardship program shall, to the extent it is technologically feasible and economically practical:

(8) Finance all program activities solely through producer funding.

Section (c) Any plan submitted pursuant to subsection (b) of this section shall:

(2) Describe how the program will be financed.

Section (d) Each stewardship organization shall establish and implement a system for financing the tire stewardship program that covers the costs of developing the plan described in subsection (c) of this section, operating and administering the program described in subsection (b) of this section and maintaining a financial reserve for six months sufficient to operate such program. Each stewardship organization shall maintain all records relating to the tire stewardship program for a period of not less than three years. Funding of such program may be through a fee structure.

Determination of Program Costs

To estimate the total cost of the Program, CTS completed a cost modeling exercise for the first two years of Program implementation and operations. Program costs generally include:

- Program start-up costs
 - Program Plan development
 - Capital investment for administrative needs (e.g., office space, computers, preliminary staffing)
 - Loans
 - Reserves
- Operational Program costs
 - Tire collection and transportation
 - Processor payments and incentives
 - Education and outreach efforts
 - Collection containers
 - Support for improperly disposed Tires
 - Loans
- Ongoing Program administration costs
 - Personnel
 - Administrative and overhead costs
 - Payments
 - Program audits (in accordance with Subsection (i) of the Act).

- Accounting for the ability for the Commissioner to take up to five per cent of the total Program costs for administration of the Tire Stewardship Program.

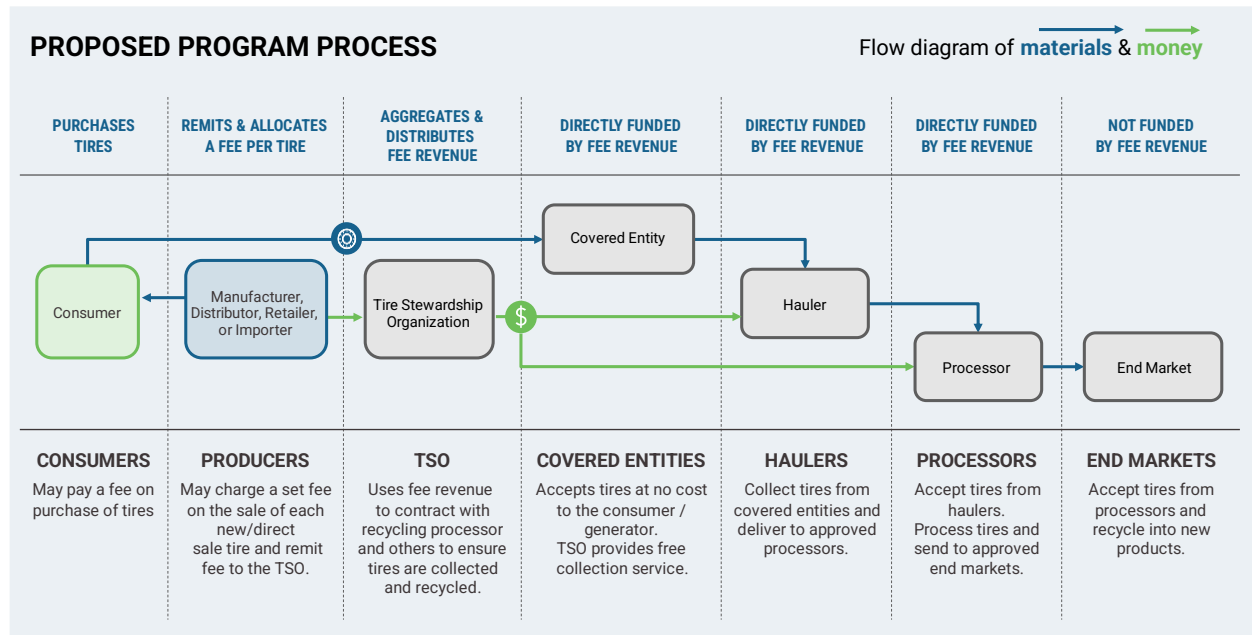
Program costs will be covered by a Program fee assessed on each Tire sold into the State. The per-Tire Program fee will vary by Tire size. To generate the fee per Tire, CTS generated an estimated Program budget, including both administrative and operational costs. Operational costs used the best data available from in State Processors. Administrative costs including a review of costs of other stewardship organizations, as well as start-up costs for this Program (e.g., collection containers, preliminary site clean-up, start-up costs, and the creation of Program reserves for six months). The total Program costs were then allocated by Tire type, based on an average of the per Tire fee allocations of the Canadian Tire Stewardship Programs.

Program costs may change over time. For example, if more Retailers decide to opt-in, Program operating costs will increase, and fees will need to be adjusted to maintain the appropriate operating reserve. As a result, the fund balance will be evaluated periodically, and fees will be adjusted as needed to maintain a financial reserve for six months sufficient to operate the Program. Such adjustments are operational changes and not “substantial changes” to the Program requiring DEEP approval.

CTS recognizes the need to work collaboratively with Producers’ supply chains serving Connecticut customers, including distributors in and out of State, in order to obtain the best data on Tires sold into the State. This will require a cooperative relationship with some sellers of Tires as those entities may not be captured as a Producer under the Act but are a part of the Tire supply chain in the State.

Figure 3 Illustrates the flow of fees as well as the movement of Tires throughout the system.

Figure 3. Proposed Program Process: Flow of Fees and Tires Throughout the System



Performance Goals

This text box is provided to ensure the following sections of the Act outlined in the text box below are met.

Regulatory References:

Section (c) Any plan submitted pursuant to subsection (b) of this section shall:

- (3) establish performance goals for the first two years of the program;*
- (4) describe the industry transition timeline that is required to achieve such performance goals and how the plan will, to the greatest extent economically feasible, utilize existing service providers and infrastructure in the state*

Section (f)(2) Two years after implementation of such tire stewardship program, the tire stewardship organization shall submit updated performance goals to the commissioner that are based on the experience of the program during the first two years of the program.

In accordance with the Act, this initial Program Plan establishes Performance Goals for the first two years of Program implementation. Two years after implementation, CTS will submit updated Performance Goals that are based on Program experience.

To date, Connecticut is the only state to have enacted an extended producer responsibility law for Tires. CTS is also the only party that has expressed an intention to submit a Program Plan in the State in response to DEEP's request for 'Notice of Intent' letters. This will be the first Tire Stewardship Program that is financed and operated by the Producers of Tires in the U.S. Because there is little historical data on which to base Tire recovery or Recycling goals, the goals for the initial years of the Program will focus on building Program awareness, recruiting Covered Entities to provide statewide accessibility, and properly managing Tires.

Awareness

The Program will focus resources on supporting Covered Entities, such as Retailers and other distributors of new Tires, and local governments, as described in the Promotion and Education Section of this Plan.

To measure the effectiveness of consumer awareness activities, the Program will conduct a survey every two years, beginning with a baseline survey conducted at Program launch. The survey will aim to measure consumer awareness of Tire Recycling, that Tires can be returned to the Program at no cost, and how to properly dispose of Tires. Program results will be compared between survey intervals to assess the impact of the outreach strategy and adjust where needed.

The Program will also use additional information on illegal dumping provided by local governments in the outreach survey. The Program conducted an initial survey with local governments to attempt to better quantify illegal dumping in the State. Continued dialogue and data collection will also help to inform the Program if there are geographic areas that require focused attention for Program outreach.

Accessibility

To provide statewide access to the Program, CTS will actively work to recruit Covered Entities for participation. CTS has already made extensive efforts to offer free Tire collection to those identified in the Act and other parties that may collect Discarded Tires in the State.

Given that the Act prohibits Program participants from charging for the receipt of Discarded Tires, and that a current Retailer practice in the State is to collect a Recycling fee at the point of return, there may be a structural disincentive for Retailers to participate as Covered Entities in the Program. In light of this concern, which lays outside CTS control, the Program will base Program performance on an accessibility metric.

Specifically, CTS has established a goal of capturing 95% of the State's population within a 15-mile radius of a participating Covered Entity within the first two years of Program implementation. This metric will be calculated through a geospatial analysis in the first year of Program operations assessing population distance to Covered Entities in the State. The resulting map will be made available on the Program website as an interactive tool that can be used by residents to identify the nearest participating Covered Entity.

CTS will evaluate statewide coverage against this metric and work to address any gaps in collection services identified. The first two years of the Program will focus on filling all gaps to ensure there is a statewide network of no-cost return locations for Tires to be properly managed and recycled. If there are service gaps in Program coverage utilizing Covered Entities, CTS will evaluate additional service options to ensure robust access to collection statewide.

The Program will also report on the total number of Covered Entities registered as collection sites with the Program.

Tire Management

Given the lack of baseline data on the flow of end-of-life Tires in the State, CTS will work to map the flow of Tires from Covered Entities, collection service providers, and Processors that are engaged in the Program. CTS will require all contracted collection service providers and Processors to report on the ultimate end market for the Tires collected through the Program.

The Program will work to Recycle Tires in accordance with the Act within the first two years of Program implementation. The Program will also look for opportunities to enhance the current system by moving materials up the waste management hierarchy, as outlined in the Market Development section of this Plan.

Program Transition

This text box is provided to ensure the following section of the Act outlined in the text box below is met.

Regulatory Requirements

Section (c) Any plan submitted pursuant to subsection (b) of this section shall:

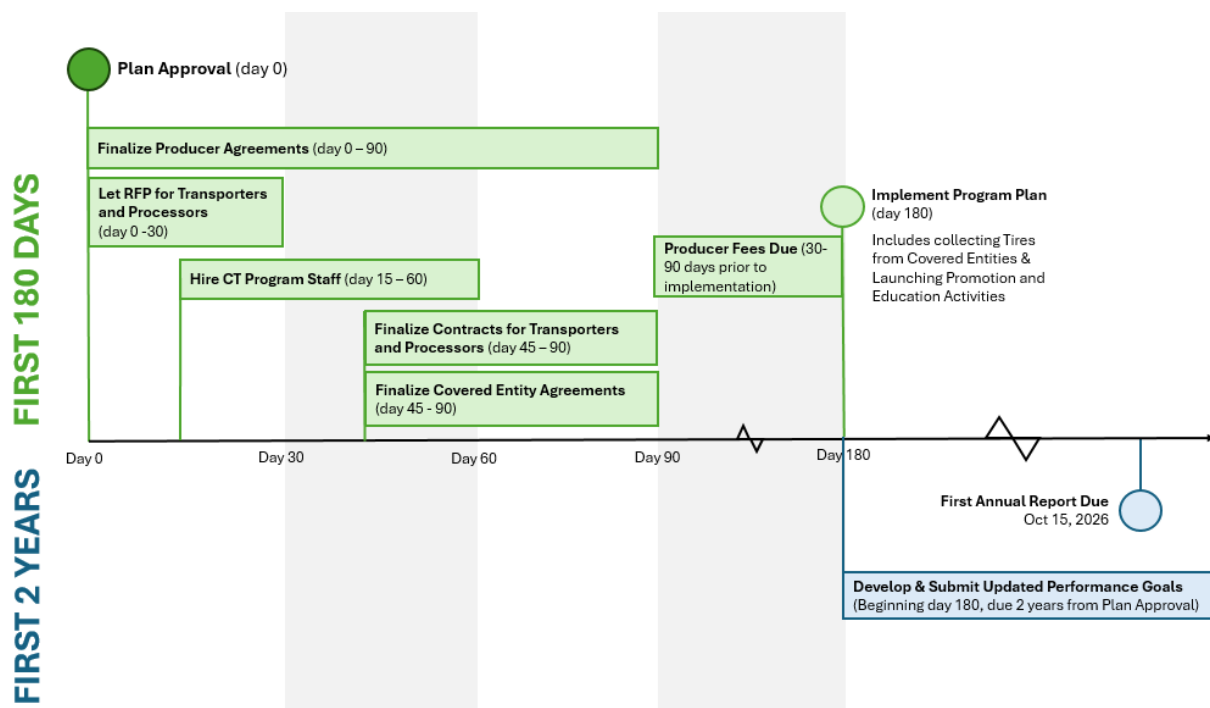
- (4) Describe the industry transition timeline that is required to achieve such performance goals and how the plan will, to the greatest extent economically feasible, utilize existing service providers and infrastructure in the state.*

Upon approval of the Program Plan by the Commissioner, the Program will begin efforts to ensure Program Plan implementation. In accordance with subsection (e) of the Act, implementation is to occur no later than 180 days after approval.

In order to ensure a seamless Program Plan transition, CTS is developing draft Producer, Covered Entity, Transporter and Processor agreements. Additionally, CTS will require hiring Program support staff and additional administrative services. CTS will execute contracts for services following Plan approval with a focus on 1) utilizing existing service providers and collection and processing infrastructure wherever economically feasible, 2) enhancing Program efficiencies, and 3) promoting the management of Tires in accordance with Connecticut’s waste management hierarchy.

Figure 4 below illustrates both the anticipated administrative actions, implementation activities and performance goal timelines of the CTS Program.

Figure 4. Anticipated Program Implementation Timeline



Annual Reporting

This text box is provided to ensure the following sections of the Act outlined in the text box below are met.

Regulatory Requirement

Section (h) ... report shall include: (1) The tonnage of tires collected pursuant to the program from: (A) Municipal transfer stations, (B) retailers, and (C) all other covered entities; (2) the tonnage of tires diverted for recycling; (3) a summary of the public education program that supports the program; (4) an evaluation of the effectiveness of methods and processes used to achieve performance goals of the program; and (5) recommendations for any changes to the program.

In accordance with the Act, CTS will report by October 15 of each year on several metrics. Such reporting will include metrics specified in Section 1(h), as well as metrics related to Program Performance Goals set by the Program. CTS intends to submit the first annual report by October 15, 2026. Given the implementation date requirement in the Act, the program is not likely to have much substantiative data (or may not have begun implementation) by the fall of 2025. Annual reports will be reported based on the year-end date of Dec 31 to align with CTS fiscal year.

The following cumulative data and results will be included in the Annual Report:

- The total number, type, and location of Covered Entities participating in the CTS Program
- The tonnage of Tires collected pursuant to the Program from:
 - Municipal transfer stations
 - Retailers
 - All other Covered Entities
- Performance Goals, including:
 - Tire collection and diversion rates
 - Economic and environmental benefits
 - Beneficial Recycling usages and targets
 - Public education and participation
 - Progress towards the Program awareness performance metric
 - Progress toward the Program access performance metric
 - Progress towards improved Tire management
- The tonnage of Tires managed under the Program at each level of the Waste Management Hierarchy, including Recycling, Tire derived fuel or other end fates
- A summary of the public education Program that supports the Program
- An evaluation of the effectiveness of methods and processes used to achieve Performance Goals of the Program
- Recommendations for any changes to the Program

Stakeholder Engagement in 2024

This section is provided for informational purposes only and provide for greater transparency in Program development. It is not intended to create enforceable plan commitments.

For simplicity, certain activities undertaken to support Program development while CTS was being formed are referred to in this Plan as CTS activities.

Preliminary Outreach:

In January 2024 USTMA attended DEEP's stakeholder meeting on Tires and expressed the intentions of its membership to lead in the development of a stewardship organization for Tires in the State to meet the requirements of the Act.

In February 2024 CTS conducted outreach interviews with current Tire Processors in the State, using publicly available data from DEEP's website. The intention of these initial calls was to introduce CTS, share the Program intentions, and begin to gather preliminary information on the flow of Tires in the State, current Collection Rates, as well as better understanding existing capacity for Tire management. Ongoing dialogue with State Processors, as well as out of State haulers and Processors has continued and will continue throughout Program development and implementation.

CTS also engaged in outreach opportunities within the State to provide an overview of the Act and the intentions of USTMA to support the development of a stewardship plan on behalf of their membership. These meetings included the Solid Waste Advisory Committee on March 26, 2024 and a local government engagement session convened by DEEP on May 29, 2024.

USTMA submitted a formal 'Notice of Intent to Form a Tire Stewardship Organization' on Tuesday, March 12, 2024, supported by USTMA members.

CTS also engaged in a focused local government survey beginning in May 2024. The survey was sent to all Municipal Recycling Coordinator's in the state seeking data on the current management of Tires and an expression of interest in Program participation. CTS received responses from one-third of the municipal transfer stations with favourable responses and further data to support Plan development. CTS will continue direct outreach to these entities with the goal of onboarding them into the Program as Covered Entities.

CTS also distributed a broader 'Covered Entity' survey in beginning in July 2024. CTS put extensive efforts into retail outreach to share and promote participation in this survey. This survey had less uptake than the local government survey. CTS will continue to engage with not only Retailers, but other potential Covered Entities in the State.

CTS also hosted a call with Tire distributors in August 2024, both those located in the State as well as out-of-State entities that may sell into the State via deliveries in person and online sales. This call focused the intentions of CTS to support the development of a stewardship plan to meet the Act, as well as welcome all distributors that are Producers under the Act to participate in the Program. The call was followed by several one-on-one calls and further outreach. A follow up call was hosted with distributors by CTS in December 2024. This call provided an additional review of the Act, the CTS Program Plan and process for Producer participation. CTS will continue to engage with distributors.

Program Plan Consultation:

CTS consulted on a draft version of the Tire Stewardship Plan for Connecticut from September 12, 2024, to October 18, 2024. The Plan was posted on a website, along with a response form and a link to a stakeholder engagement meeting.

The stakeholder engagement meeting was hosted on October 16, 2024, in Hartford, Connecticut. Thirty-four participants joined this consultation (twenty-two in person and twelve online). Participants represented a broad range of stakeholders including, local governments, Retailers, distributors, haulers, Processors, a non-profit, Tire manufacturers, DEEP, and the bill sponsor.

What We Heard:

What we heard	CTS Response or Actions
Do distributors that are ‘Producers’ need to participate as a ‘Covered Entity’ in the Program?	‘Producers’ are obligated to join a TSO or create their own. It is optional in the Act to collect Tires as a ‘Covered Entity’ on behalf of a TSO.
Could smaller Retailers work together to form one collection site?	Yes, CTS can accommodate this, provided the site meets requirements in the ‘Covered Entity’ agreement.
How will Retailers ensure tires are collected at a reasonable frequency?	This will be covered by the ‘Covered Entity’ agreement between Covered Entities and CTS.
Are retreaded Tires included in the Program?	Tires will only need to be counted at the first point of sale and end of life. However, the Program would like to work with those re-treading Tires to report data to the Program to account for this activity in accordance with the waste management hierarchy.
Are rubber tracks from machines included in the Act?	Based on informal guidance from DEEP and best practices in other jurisdictions, they are not included in this Program.
Will municipalities be able to charge for oversized Tires?	Covered Entities participating in the Program cannot charge a fee for Tires at the point of return. The cost of managing these Tires will be covered by the TSO.
How would a large volume of Tires on a farm be dealt with by the Program?	All Tires returned to Covered Entities will be managed by the Program. Covered Entities will be able to place reasonable restrictions on the number of Tires dropped at a time. For large volumes of tires, CTS may consider alternative collection options where feasible. Those with large volumes will be encouraged to contact the Program directly.
How are the Program funds to be utilized?	Program costs are laid out in the ‘financing’ section of the Program Plan. Tire Program fees will finance all program activities, including start-up costs, operational costs, and administrative costs.
Would a pilot program be a better way to test run this program?	The Act requires a statewide plan be implemented 180 days after Program Plan approval.
How will the Program improve transparency and understanding of how Tires are managed?	CTS will be responsible for the reporting and tracking of Tires managed under its Program as described in the annual reporting requirements section of the Plan.

There was concern expressed on citizen possibly double paying for Tires in CT. For example, if manufacturers are embedding this in the cost of Tires (consumer has already paid) and then the Retailer may still charge a 'recycling fee' if not a Covered Entity.	It will be up to each participating Producer to pay CTS for their Tires that are sold into CT. CTS is open for participation by all Producers and encourages Retailers to participate in this free collection Program. CTS will have contracts with Covered Entities that participate in the Program ensure all legal requirements in CT are met.
What are the performance targets in the Plan? Are there rates and dates?	The Performance Goals in the Plan are set for the first two years of Program operations. CTS will revise and add other measures at that time.
Will fleets be serviced directly by the Program?	Where fleets are servicing their own vehicles, they will be offered collection services as a 'Covered Entity'. Other fleet tires may be managed by other Covered Entities that are servicing fleet vehicles.
Are there plans to include smaller retail shops?	Yes, Retailers are listed as a Covered Entity under the Act and will be offered service. CTS reached out to many via a Retailer survey in the State. All are invited to participated as 'Covered Entities'.
How will the Program control for out of State Tires?	As is done for other returns at municipal transfer stations, Covered Entities may restrict drops offs to State residents.
How will the program ensure Tires are properly managed?	Any hauler or Processor that is participating in the Program will be under contract with the Program. Contracts will stipulate allowable end use of Tires in accordance with the Act. Contractors will be reimbursed for Tires delivered to an acceptable end point.
Is there the current capacity to manage Tires in State?	It is our understanding through engaging with Processors that there is the capacity to manage more Tires in CT.
Efficiency is important – it will be good to have fewer pick-up sites collecting greater volumes or ensure smaller sites are serviced by a 'milk' run.	CTS will need to ensure statewide access and will aim to operate an efficient and effective Tires Recycling Program.
Are organizations doing research on other uses of Tires collected by the Program?	CTS will be looking to manage Tires in accordance with CT's waste management hierarchy as articulated in the market development section. The Program will consider opportunities to encourage better management of CT Tires.
What types of documentation will be required for tracking the purchase and sale of scrap Tires?	This will be covered by CTS's Processor agreements. This is currently under development as CTS works on preparing for Program implementation. Producers will need to report to the TSO on the number of Tires sold in Connecticut under the brands they are responsible for. Recycled Tires will be tracked through the agreements with Covered Entities and Processors of used Tires

What are the reporting requirements for businesses involved in the sale and purchase of scrap Tires?	This is currently under development as CTS works towards Program implementation. Producers in the CTS Program will be required to report on Tires sold, and Covered Entities will be reporting on Tires collected and sent to CTS for Recycling.
How will the state enforce the new policy, and what penalties might businesses face for non-compliance?	This question is best directed to the DEEP.
How does the Act affect the importation of off-brand Tires from other states?	CTS is implementing a Program under the Act. This question regarding policy is best directed to DEEP.
Are there anticipated future changes to the policy that we should be aware of?	This question is better directed to DEEP.
Concerned with definition of "Recycling" that it may include the use of Tires or processed materials that are incinerated or used as a fuel or fuel supplement, provided such incineration does not occur in this state. That seems to go against the definition of "Recycling" for other materials.	The definition of recycle is from the Act.
Would salvage yards be considered a Covered Entity?	Yes. Any end point of Tires could be considered a Covered Entity. We have amended the 'Covered Entity' section to include salvage yards. CTS will continue outreach efforts and encourages any interested party to contact the Program directly at tirestewardship@recycle.com .
How are Retailers being addressed in this legislation?	CTS program is designed to service all Tires in the State and welcomes Retailer participation.
How will the CTS incentivize building more crumb rubber processing capacity in CT?	As stated in the Plan, it is our current understanding that there is the capacity to process more crumb rubber in CT. As the Program works to map the movement of Tires, CTS will look for opportunities to better manage Tires. This may include providing incentives.
Other EPR programs in CT provide covered storage containers for their materials, and our facility would need the same for Tires. We are concerned with the terminology where it is "technologically feasible and economically practical".	We have included the regulatory language in the Plan. CTS intends to support Covered Entities with infrastructure needed at collection sites to ensure statewide public access.
In order to run smoothly, transfer stations will need to set limits on how	CTS supports the inclusion of limited number of Tires at drop off and can include this in the 'Covered Entity

<p>many tires can be brought in a time. The MRC provides an alternative location for larger loads of mattresses, and this would be very helpful for Tires as well.</p>	<p>Agreement'. CTS will look into options for servicing larger volumes of Tires.</p> <p>Additional text has been added to the 'Collection and Processing' section of this Plan.</p>
<p>Currently there is no regulatory statute or MTSGP that requires that transfer stations and or other locations that collect Tires "Cover and store" Tires. I would ask that you define clearer in the Plan what you mean by "to cover and store any Discarded Tires in a location..."</p>	<p>CTS will work with Covered Entities to ensure Tires are properly managed and meet legal requirements.</p>
<p>As a local government, I would like to have a simple flyer on hand for residents.</p>	<p>This request is aligned with the outreach and education portion of the Plan. CTS is happy to provide this resource.</p>
<p>How will the Program changes be communicated to the public?</p>	<p>Please see the outreach and education section of the Plan.</p>
<p>Suggest encouraging towns to contact their local garages to participate. CTS could provide simple electronic materials for download.</p> <p>Suggest investing in some high-level outreach - radio, billboards, etc. - to help boost the smaller efforts.</p> <p>Would like to provide information at point of sale to let people know they have a choice.</p>	<p>Any additional sharing of information about the CTS Program is appreciated by CTS.</p> <p>CTS will provide several documents in a downloadable format on the website.</p> <p>All Covered Entities registered with the Program will receive Program materials.</p> <p>Other suggestions will be considered as part of the Program's outreach efforts.</p>
<p>Concern on the lack of printed material and the use of the terms MAY and SOME in the section on outreach materials. There is a concern there is a segment of the population that may be underserved by these efforts. What about physical signage at collection locations? Some stewardship organizations partner with Covered Entities and share the expense of public education such as share newspaper ads or billboards. Is this something the CTS has considered?</p>	<p>CTS will provide downloadable materials, as well as printed materials upon request.</p> <p>CTS would be happy to partner with Covered Entities on public education initiatives. Language has been added to the 'Outreach and Education' section.</p>
<p>Market development means economic development. Every State Office of Economic Development</p>	<p>Preliminary outreach efforts to date suggest there is greater capacity in the State for Tire Recycling.</p>

<p>uses economic incentives to attract innovative companies who bring job prosperity to their State. Economists report, “Effective Recycling creates an average of nine times more jobs than (trash) disposal”.</p> <p>Is CTS open to economic incentives, for circular outcomes, in its budget?</p> <p>What is the best forum to advance this CTS?</p>	<p>CTS will map the flow of Tires and look for opportunities to improve the downstream management.</p> <p>If investments are needed to move material up the waste management hierarchy, CTS will consider options to support, such as an incentive program.</p>
<p>I didn't feel the TSO/CTS defined and laid out an actual market development plan. Instead, this section states you "will assist, as needed" and "to the extent practicable... will track Tires sold." you will "research and analyze opportunities..." Why not be specific in supporting the development of a circular economy? Or even the commitment to developing a sustainable program for Tires to Tires? And although PA 23-62 puts the responsibility on CT DOT to test and pilot RMA, why not show a commitment to support the research and development in Connecticut to show you truly support a circular economy?</p>	<p>Existing data in CT does not provide great detail on the currently flow of Tires collected in CT.</p> <p>As stated in the Plan, CTS will map the flow of Tires from CT and identify opportunities to improve the management of Tires. Where needed CTS may provide incentives for better management of Tires.</p> <p>A section was added to the Plan on some current work that is being led by Tire Recycling Foundation and the USTMA</p> <p>Links:</p> <ul style="list-style-type: none"> • TRF Tire Recycling Foundation • 2023 ELT Tire Report Page USTMA
<p>I would like to hear details of how this will be funded and anticipated cost to residents. What are the five- and 10-year projections?</p>	<p>The Program cost model has been updated since the draft Plan was released to illustrate estimate per Tire fees. These fees will be paid to the CTS by Producers. As the Program evolves cost modeling will be updated to ensure the Program is adequately funded.</p>
<p>The CT EPR Tire requires advancing more effective environmental and economic outcomes. Thus, why is there “Zero” budget allocation to invest in greater results?</p>	<p>The Program will be investing in more effective environmental outcomes, as laid out in the Plan. These include initiatives around supporting mismanaged Tires, as well as better managing Tires in accordance with the Waste Management Hierarchy.</p>
<p>I'm curious why the Plan does not include a fee structure given it does state "to be completed prior to program plan submission" This isn't a new concept or program as its being done in other places. Why not use</p>	<p>The fee model was under development during Plan consultation. Many of the suggestion here were used in the development of the funding model under this unique legislation.</p>

<p>similar cost analysis from Canada and/or from existing partners? This isn't changing the system (it's all the same stakeholders), its simply changing who pays for it and creating accountability. There is already a known cost to collect, transport and process Tires in Connecticut, why not use current cost and then scale within a new efficient system?</p>	
<p>How many Tires do you anticipate will be collected?</p>	<p>This will vary greatly depending on the participation of Retailers as Covered Entities. As the Program continues to register more Covered Entities, the Program will be updated accordingly.</p>
<p>Diversion rates, the environment, and economics are all listed in the Act's "Performance Goals".</p> <p>How will each of these be measured and reported?</p> <p>What is the best forum to advance measurement criteria with the CTS?</p>	<p>The Program has provided preliminary Performance Goals for the first two years of Program operations to enable CTS to register and collect data on the current flow of Tires.</p> <p>Annual reports will include those identified in the Program Plan, as well as the Act.</p> <p>Diversion rate will be a measure of what portion of Tires are diverted to what end fate management.</p> <p>Environmental and economic benefits will include reporting on, volumes of Tire managed at each level of the Waste Management Hierarchy, support for mismanaged Tires, and any noted economic benefits.</p> <p>The Program will also work with downstream Processors to provide greater transparency in the end markets for Tires and may provide incentives to encourage better management of Tires.</p>
<p>Is it feasible to report tonnages collected by municipality? In addition to tonnage, data collected presented by Tire category as broken down on page 17?</p>	<p>The municipal survey resulted in some municipalities reporting by tonnage and others by Tires.</p> <p>The Program will report number of Tires sold and Tires collected for diversion rate reporting.</p> <p>For Tire Processing and end of life management, it is likely these volumes will be reported in weight.</p>
<p>Would CTS consider including reduction of carbon emissions in its Plan?</p>	<p>This may be considered as a Performance Goal to measure environmental benefits. Such goals will be considered in the development of expanded Performance Goals for the updated Plan in two years' time.</p>

	Baseline data will be needed to set such goals.
The Plan is very comprehensive. Sound analysis of expected Tire Retailer participation and the potential impact.	The Program will continue to offer services to all Retailers as Covered Entities and report annually on all participating Covered Entities.
What is the best forum to advance circularity vs. disposal plan design?	<p>The Producers of Tires are tasked to manage Tires in accordance with the Act. This Plan has included the Program intentions to manage tires in accordance with Waste Management Hierarchy in CT.</p> <p>This initial Plan will set Performance Goals for the first two years of Program operations and work to establish baseline data on Tire management in CT. This will identify areas for improvement.</p>
If a city provides for curbside collection of Tires, how will this Program affect the current system.	<p>The Program will provide services to Covered Entities.</p> <p>CTS will engage directly with any city that provides curbside collection on how these Tires are currently managed and how best to manage these Tires under the Program.</p>
Under Improperly managed Tires reporting may - this may be too much. It would be helpful to create a database that could track illegal dumping of Tires to determine if this is helping.	<p>In jurisdictions with mature EPR programs illegal dumping is often significantly reduced. This was one of the drivers of this Act. CTS will engage in outreach and awareness programs aimed at prevention.</p> <p>The Program is committed to track, report on, and support the abatement of improperly managed Tires. The Program may consider reporting options to best support local governments.</p>
The TSO should require an eco-fee at the point of sale to the consumer and hold Retailers accountable for participation in the Program.	<p>The CTS does not own or operate any retail establishments or have the authority to force their participation.</p> <p>Producers will pay CTS for the Tires they Supply into the State.</p> <p>The Act as written does not obligate Retailer participation.</p> <p>CTS will continue to engage Retailers and encourage their participation in the Program.</p>

Appendix A: Participating Tire Producers

Responsible Entity Name	Brand/Trade Name	Tire Type
Bridgestone Americas, Inc.	Bridgestone	Light Duty Vehicle Tires
Bridgestone Americas, Inc.	Bridgestone	Medium and Heavy Duty Vehicle Tires
Bridgestone Americas, Inc.	Bridgestone	Motorcycle Tires
Bridgestone Americas, Inc.	Firestone	Light Duty Vehicle Tires
Bridgestone Americas, Inc.	Firestone	Medium and Heavy Duty Vehicle Tires
Bridgestone Americas, Inc.	Fuzion	Light Duty Vehicle Tires
Bridgestone Americas, Inc.	SureDrive	Light Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Bluestar	Light Duty Vehicle Tires
CMA, LLC/Double Coin Tires	DoubleCoin	Medium and Heavy Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Dynastar	Light Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Dynatrail	Light Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Riverforce	Medium and Heavy Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Rolling Big Power	Medium and Heavy Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Trelleborg	Medium and Heavy Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Warrior	Light Duty Vehicle Tires
CMA, LLC/Double Coin Tires	Warrior	Medium and Heavy Duty Vehicle Tires
Continental Tire the Americas, LLC	Airfix	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Airfix	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Airfix	Motorcycle tires
Continental Tire the Americas, LLC	Ameri*Steel	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	America	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Bandvulc	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Barum	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Barum	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Barum	Motorcycle tires
Continental Tire the Americas, LLC	BestDrive	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Blackstone	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Capitol	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Continental	Medium and heavy duty tires
Continental Tire the Americas, LLC	Continental	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Continental	Motorcycle tires
Continental Tire the Americas, LLC	Contire	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Cosmos	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Dunlop	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Dunlop	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Dunlop	Motorcycle tires
Continental Tire the Americas, LLC	ESA+ Tecar	Light Duty Vehicle Tires

Continental Tire the Americas, LLC	Eurostone	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Eurotec	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Eurotyre	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Euzkadi	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Euzkadi	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Fate	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Feu Vert	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Flamingo	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	General	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	General	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	General	Motorcycle tires
Continental Tire the Americas, LLC	General	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	General Tire	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Gislaved	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Global	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Hoosier	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Kingstone	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Kormoran	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Mabor	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Marongoni	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Matador	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Matador	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Mazama	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Midas	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Midas	Motorcycle tires
Continental Tire the Americas, LLC	Minerva	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	MYCAR	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Nichols	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Norauto	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Paxaro	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Platin	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Point S	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Retrak	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Roadhandler	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	ROADHOG	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Sebring	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Semperit	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Semperit	Motorcycle tires
Continental Tire the Americas, LLC	Semperit	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Sidewinder	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Sime	Motorcycle tires

Continental Tire the Americas, LLC	Sime Tyres	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	SIME TYRES	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	SIMEX	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	SIMEX	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	SIMEX	Motorcycle tires
Continental Tire the Americas, LLC	Speedy	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Sportiva	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Sumitomo	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Sumo	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Taxat	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Team Star	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	TEAMSTAR	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Tiger Wheel	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Toyo	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Truckstar	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Tyfoon	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Ultrex IV	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Uniroyal	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Uniroyal	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Uniroyal	Medium Duty and Heavy Duty Tires
Continental Tire the Americas, LLC	Viking	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Yokohama	Light Duty Vehicle Tires
Continental Tire the Americas, LLC	Yokohama	Medium Duty and Heavy Duty Tires
Giti Tire	Dextero	Light Duty Vehicle Tires
Giti Tire	Giti	Light Duty Vehicle Tires
Giti Tire	Giti	Medium Duty and Heavy Duty Tires
Giti Tire	GT Radial	Light Duty Vehicle Tires
Giti Tire	GT Radial	Medium Duty and Heavy Duty Tires
Giti Tire	Primewell	Light Duty Vehicle Tires
Giti Tire	Rocky Mountain	Light Duty Vehicle Tires
Hankook Tire America Corporation	Hankook	Light Duty Vehicle Tires
Hankook Tire America Corporation	Hankook	Medium Duty Vehicle Tires
Hankook Tire America Corporation	Hankook	Heavy Duty Vehicle Tires
Hankook Tire America Corporation	Hankook & New Englander	Light Duty Vehicle Tires
Hankook Tire America Corporation	Hankook & Traction Control	Light Duty Vehicle Tires
Hankook Tire America Corporation	Laufenn	Light Duty Vehicle Tires
Hankook Tire America Corporation	Laufenn	Medium Duty Vehicle Tires
Hankook Tire America Corporation	Laufenn	Heavy Duty Vehicle Tires
Hankook Tire America Corporation	PathFinder	Light Duty Vehicle Tires
Hankook Tire America Corporation	Statewide	Light Duty Vehicle Tires

Kumho Tire	Kumho Tire	Light Duty Vehicle Tires
Kumho Tire	Kumho Tire	Medium Duty and Heavy Duty Vehicle Tires
Michelin North America Inc.	BF Goodrich	Light Duty Vehicle Tires
Michelin North America Inc.	BF Goodrich	Medium Duty and Heavy Duty Vehicle Tires
Michelin North America Inc.	Michelin	Light Duty Vehicle Tires
Michelin North America Inc.	Michelin	Medium Duty and Heavy Duty Vehicle Tires
Michelin North America Inc.	Michelin	Motorcycle tires
Michelin North America Inc.	Riken	Light Duty Vehicle Tires
Michelin North America Inc.	Uniroyal	Light Duty Vehicle Tires
Michelin North America Inc.	Uniroyal	Medium Duty and Heavy Duty Vehicle Tires
Nitto Tire U.S.A. Inc.	Nitto	Light Duty Vehicle Tires
Nokian Tyres US Operations LLC	Nokian Tyres	Light Duty Vehicle Tires
Nokian Tyres US Operations LLC	Nokian Tyres	Medium Duty and Heavy Duty Vehicle Tires
Nokian Tyres US Operations LLC	Nordman	Light Duty Vehicle Tires
Nokian Tyres US Operations LLC	Private brand	Light Duty Vehicle Tires
Pirelli Tire LLC	Metzeler	Motorcycle Tires
Pirelli Tire LLC	Pirelli	Light Duty Vehicle Tires
Pirelli Tire LLC	Pirelli	Motorcycle Tires
Sailun Group Co., Ltd.	Blackhawk	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Blackhawk	Medium Duty and Heavy Duty Vehicle Tires
Sailun Group Co., Ltd.	Dynamo	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Dynamo	Medium Duty and Heavy Duty Vehicle Tires
Sailun Group Co., Ltd.	Ironhead	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Ironhead	Medium Duty and Heavy Duty Vehicle Tires
Sailun Group Co., Ltd.	Maxam	Medium Duty and Heavy Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires
Sailun Group Co., Ltd.	Private brand	Light Duty Vehicle Tires

The Goodyear Tire & Rubber Company	BIG O	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Blackstone	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	BLUE STREAK TBA 8	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	BLUE STREAK TBA 9	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	BLUE STREAK- BLSTRK	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	BLUE STREAK- GDYR	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Centara	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Cooper	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Cooper	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Cooper	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dean	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dean	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dean PB	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Debica	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Debica	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Debica	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Diamondback	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Diplomat	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Douglas	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dunlop	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dunlop	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dunlop	Motorcycle tires
The Goodyear Tire & Rubber Company	Dunlop	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dunlop	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Dunlop	Motorcycle tires
The Goodyear Tire & Rubber Company	Durun	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Falke	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Fulda	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Fulda	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Fulda	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Futura	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Geotred	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Geotred	Light Duty Vehicle Tires

The Goodyear Tire & Rubber Company	Goodyear	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Goodyear	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Hercules	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Ironman	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Kelly	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Kelly	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Kelly	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Lemans	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Lexington	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Loadrunner	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Mastercraft	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Mastercraft	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Mickey Thompson	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Mickey Thompson	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Mickey Thompson	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Motomaster	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Motrio	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Non-core brand	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	O'Green	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Omega	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Provato	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Remington	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Remington	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Roadmaster	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Roadstone	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Sava	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Sava	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Sava	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Sava	Light Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Starfire	Light Duty Vehicle Tires

The Goodyear Tire & Rubber Company	Starfire	Medium Duty and Heavy Duty Vehicle Tires
The Goodyear Tire & Rubber Company	Steelmark	Medium Duty and Heavy Duty Vehicle Tires
Toyo Tire Holdings of Americas Inc.	Nitto	Light Duty Vehicle Tires
Toyo Tire Holdings of Americas Inc.	Toyo	Light Duty Vehicle Tires
Toyo Tire Holdings of Americas Inc.	Toyo	Medium and Heavy Duty Vehicle Tires
Yokohama Tire Corporation	Galaxy	Medium Duty and Heavy Duty Vehicle Tires
Yokohama Tire Corporation	Yokohama	Light Duty Vehicle Tires
Yokohama Tire Corporation	Yokohama	Medium Duty and Heavy Duty Vehicle Tires
Yokohama TWS North America, Inc.	Mitas	Motorcycle Tires

*Changes to this Preliminary Participating Tire Producers Appendix are not “substantial changes” to the Program requiring DEEP approval.

Appendix B: Preliminary Program Fee Schedule (January 2025)

Tire Category	Tire Sub-Category	Fee Per Tire
Passenger and Light Truck	Passenger, Small RV, Light Truck	\$2.00
	Motorcycle, Golf Cart, All Terrain Vehicle	\$2.00
	Small Utility, RV Trailer, Mobile Home	\$2.00
	Lawn & Garden Tractor	\$2.00
Truck / Bus	Medium Truck, Bus, Highway Trailer	\$3.00
Agricultural	Agricultural (Small)	\$3.00
	Agricultural (Medium)	\$4.00
	Agricultural (Large)	\$5.00
Industrial	Forklift, Bobcat, Skid Steer	\$3.00
	Logger/Skidder	\$9.00
	Skid Steer, Loader	\$4.00
	Non-commercial aircraft	\$6.00
Off the Road	Small Off the Road	\$7.00
	Medium Off the Road	\$16.00
	Large Off the Road	\$25.00
	Giant Off the Road	\$52.00

*As noted in the Plan, changes to this Preliminary Program Fee Schedule are not “substantial changes” to the Program requiring DEEP approval.