







## TIRE STEWARDSHIP MANITOBA INC.

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# EXECUTIVE SUMMARY

The 2023 – 2028 Tire Stewardship Program Plan continues to build and demonstrate value in the significant accomplishments of the TSM program.

Tire Stewardship Manitoba (TSM) is a not-for-profit corporation formed as a Producer Responsibility Organization (PRO) to represent tire stewards in Manitoba. TSM assumed responsibility for operating Manitoba's tire stewardship program after replacing government's Tire Stewardship Board (TSB) on April 1, 2008. Manitoba's tire stewardship program has successfully integrated steward responsibility for all designated types of tires and tubes sold in Manitoba, and the collection and recycling of end-of-life tires in all regions of the province.

Through the strong support and effort of over 1500 program stakeholders that includes a Manitoba-based tire recycler, 1386 new tire retailers, motor and equipment dealers and generators, and 140 community partners including First Nations, TSM continues to build value in what we do and meet its primary objective to recycle all tires and tubes available for recycling in Manitoba on an annual basis.

With the assistance of our community partners, retailers, dealers and generators, over 1526 sites in Manitoba have been registered for end-of-life tire collection service by TSM. The program's tire recycler maintains the capacity and ability to collect and recycle all of Manitoba's end-of-life tires effectively and efficiently. The strong relationship between TSM, recycler, government, and stakeholders provide a stable basis for building and demonstrating value in a sustainable tire stewardship program.

TSM supports Manitoba's tire recyclers to invest in and develop higher value tire-derived products and create employment within the province. The collection and processing of over 20,000 tonnes of end-of-life tires and tubes in Manitoba creates approximately 60 full-time jobs and over \$9 million in direct economic activity annually. These tires are recycled into aggregate, crumb rubber, blast mats, and moulded products or as markets require can be exported as a fuel supplement replacing fossil fuel alternatives.

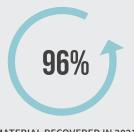
TSM conducts a community education and awareness program that engages Manitoba residents to learn more about "Who we are" and "The value of what we do", through digital marketing, awareness campaigns, social media, in-person events, and online surveys directly with the consumer. Our messaging includes the first "R" Reduce through

tire health, safety, and maintenance as well as "What happens to your tires", and information on tire derived products, processed and manufactured right here in Manitoba.

Tire Stewardship Manitoba promotes best practices for the management of end-of-life tires in Manitoba. A life cycle assessment of tire recycling in Manitoba that compares environmental impacts from program activity against impacts of competing products found that Manitoba's short overall transport distances and clean electricity grid produce relatively small impacts and a net environmental benefit for tire recycling in the province.

TSM consulted with stakeholders to develop the 2023 – 2028 Tire Stewardship Program Plan presented here. The feedback received from stakeholders demonstrates strong satisfaction and agreement with how TSM operates the tire-recycling program in our province. Surveys of retailers, communities and consumers found similar results and agreed that the tire recycling program operated by TSM is very important to the environment and Manitoba.

The 2023 – 2028 Tire Stewardship Program Plan continues to build and demonstrate value in the significant accomplishments of the TSM program and focuses on operating an effective, efficient, and sustainable tire stewardship program. Financial projections for the duration of this plan indicate that program sustainability will continue to be achieved through sound management. Therefore, without significant change to the existing program proposed, TSM is applying to the Minister of Environment, Climate and Parks for its fourth program plan approval since 2007, to extend its mandate to June 30, 2028.



# TSM PROGRAM PLAN

#### *Mission Statement:*

Tire Stewardship Manitoba is a province wide agent of the Manitoba tire industry committed to protection of the Earth's environment and promotion of economic benefit for Manitoba through the sustainable management of all tires and tubes in Manitoba. - TSM Board of Directors, November 2007

Tire Stewardship Manitoba's (TSM) mandate is to implement an approved tire stewardship program plan substantially in accordance with its intent, consistent with the requirements of the Waste Reduction and Prevention Act, the Tire Stewardship Regulation 2006, and the Guideline for Tire Stewardship, as approved and amended. To fulfill its mandate, TSM will work with Manitoba Environment, Climate and Parks and all program stakeholders to achieve the following objectives:

- $\bullet$  Operate a program that addresses all tires and tubes in Manitoba.
- Ensure timely, cost-efficient collection of all end-of-life tires from all parts of the province without user fees at the point of collection.
- Ensure adequate recycling capacity to prevent build-up of backlogs of whole or partially processed tires.
- Promote economically viable end uses and market applications for tires.

TSM is a not-for-profit corporation formed to manage the tire stewardship program on behalf of the tire industry stewards in Manitoba. TSM had its initial tire stewardship program plan approved in 2007, with renewals in 2011 and 2018 in accordance with the Tire Stewardship Regulation 2006. Without significant change to the existing program proposed, TSM is applying to the Minister of Environment, Climate and Parks for a five-year program plan renewal to extend its mandate to June 30, 2028.

#### **PROGRAM PLAN ELEMENTS**

Manitoba's tire stewardship program operated by TSM includes the following main elements:

- Steward-fee based revenue system to make the program financially viable
- Varying steward-fees according to tire type to avoid cross-subsidization
- TSM collection of steward-fees directly from tire retailers
- Collecting and recycling of all end-of-life tires and tubes
- Board governance representing industry stewards

#### **GOVERNANCE MODEL**

A volunteer Board governs TSM and is composed of several directors representing the following Member organizations:

- Tire and Rubber Association of Canada
- Retail Council of Canada
- Western Canada Tire Dealers Association

Collectively, these organizations represent the international tire manufacturers, major suppliers, and tire retailers in Manitoba. As of March 17, 2022, the TSM Board members were:

- Ken Essex, Western Canada Tire Dealers Association
- Joe Casciano, Retail Council of Canada
- Kendale Penner, Western Canada Tire Dealers Association
- Geoff Sine, Member-at-Large
- William Bench, Tire and Rubber Association of Canada
- Carol Hochu, Tire and Rubber Association of Canada

A multi-stakeholder advisory committee also contributes to good governance of TSM program operations. The committee is composed of representatives of recyclers, communities, industry consumers and the provincial government. As of December 1, 2022, the seven TSM Advisory Committee member organizations were:

- Manitoba Motor Dealers Association
- Association of Manitoba Municipalities
- Keystone Agricultural Producers
- Manitoba Trucking Association
- Western Equipment Dealers Association
- Reliable Tire Recycling
- Green Action Centre
- Manitoba Environment, Climate and Parks

TSM is accountable to its stakeholders and the public for the collection, recycling and environmentally sound disposal of all tires and tubes designated under the regulation. Through an open and transparent



revenue system, TSM collects a steward-fee (See Appendix A) on the sale of new tires from the retailer and these fees pay for collecting and recycling Manitoba's end-of-life tires and tubes in an environmentally responsible manner. All steward-fees collected are applied by TSM to the operation and enhancement of Manitoba's tire stewardship program. TSM has developed board governance policies and procedures consistent with established industry standards and is subject to an annual professionally conducted financial audit.

#### PROGRAM PLAN CONSULTATION

TSM is committed to a consultation process that allows all interested parties and affected industry stakeholders an opportunity to provide their valuable input toward the development of the 2023 – 2028 program plan. TSM's consultation process involved inviting input from key target audiences, including tire industry producers and sellers, other affected industries, communities, environmental organizations, and consumers

To facilitate this consultation process, members of TSM's Stakeholder Advisory Committee representing generators, collectors, recyclers, industry consumers, environmental organizations, and communities who provide ongoing advice on program policy and operation were presented the draft program plan through a consultation webinar prior to the start of the six-week public consultation period that ran from October 19th, 2022, to November 30th, 2022.

Stakeholder groups, including the Advisory Committee, were notified of TSM's application to renew our program plan, and provided sufficient opportunity for stakeholder organizations to engage their membership, review the proposed program plan and respond to TSM. TSM also surveyed retailers, communities, and consumers throughout the consultation period on the key value metric of tire recycling program importance.

TSM's consultation demonstrated that stakeholder respondents are predominantly satisfied and agree with how TSM operates the tire recycling program in our province. In two separate surveys of consumers, and program registrants (retailers, community storage site operators and other generators) responded near unanimously that the tire recycling program is very important to the environment and Manitoba.

Manitoba's approach to tire recycling is effective in managing all tires and tubes in the most cost-effective way for consumers, industry, and government. The Plan presented here maintains the program as it has developed since April 1, 2008. Results of the consultation (See Appendix B) form part of TSM 2023-2028 program plan renewal application to the Minister of Environment, Climate and Parks.



#### **PROGRAM STAKEHOLDERS**

#### **Manitoba Environment, Climate and Parks**

The provincial government requires industry to have an approved tire stewardship plan according to the Tire Stewardship Regulation 2006, and monitors TSM's annual performance. TSM will continue to work with Manitoba Environment, Climate and Parks to ensure the achievement of the highest environmental standards and economic value for Manitoba's tire stewardship program.

#### Tire Stewardship Manitoba Inc.

TSM is composed of a board of directors that governs all aspects of the program. The board conducts regular meetings, makes decisions on program direction, and produces an annual report and audited financial statements to demonstrate the program's accountability to all stakeholders. TSM will continue to operate with the goal of achieving exemplary and ongoing improvement in board governance practices toward building an effective, efficient, sustainable, and well-governed producer responsibility organization.

#### **Advisory Committee**

Representatives from generators, collectors, recyclers, industry consumers and local governments provide advice on program policy and operations. TSM will continue to support fully its multi-stakeholder advisory committee to ensure their ongoing contribution to good governance of TSM program operations.

#### **TSM Management and Administration**

Management and Administration carry out the registration of retailers, generators, and recyclers as eligible participants in the program. They also collect steward-fees from retailers to pay financial incentives to recyclers for the collection and recycling of end-of-life tires. Management and Administration also oversee all other aspects of program delivery and report on performance. TSM operates in accordance with the highest standards in all relationships with program stakeholders, the environment, and the community. TSM fosters a climate that encourages innovation and diligence amongst staff. TSM will continue to monitor, with the support of the program's auditor, management performance based on compliance with board governance policies, administrative procedures, and operations within the approved budget.

#### **New Tire and Vehicle Sellers**

Tire retailers accept tires discarded by consumers and remit steward-fees to TSM. New vehicle dealers remit steward-fees for each tire included with the new vehicle sale. TSM will continue to represent and work with new tire and vehicle retailers as contributing program members and primary ambassadors to the consumer. TSM also will continue to work with our registered retail members to improve remittance procedures to manage and reduce program costs while ensuring fairness and a level playing field for all those selling new tires.

#### Generators

Generators include transportation companies and auto wreckers that generate end-of-life tires as part of their regular business. Generators that register with TSM can have their tires collected from their place

of business where service is available or may take their tires to a registered community landfill storage and transfer station at no charge. TSM will continue to locate all points of end-of-life tire generation in the province and ensure they become registered collection points and receive service, at no charge; specific to the characteristics and needs of the region in which they are located.

#### **Manitoba Communities**

Manitoba communities including First Nations operate registered community landfill storage and transfer stations that accept end-of-life tires and tubes from consumers, new tire and vehicle retailers, and generators at no charge. Communities receive TSM incentive payments to accept and appropriately store end-of-life tires and tubes generated in Manitoba. This reduces the risk of fires and environmental hazards. TSM will continue to engage and partner with Manitoba communities including First Nations to ensure tires and tubes are stored appropriately, collection is provided as warranted and unnecessary accumulation is avoided in rural, remote, and historically under-serviced areas of the province.

#### Collectors

Collectors are the recyclers themselves or haulers who enter business relationships with recyclers to pick up end-of-life tires and tubes from retailers and generators for delivery to recyclers. This service, where available, is provided at no additional charge to the retailer or generator. It is TSM's intention to ensure timely, cost-efficient collection of all end-of-life tires and tubes from all parts of the province without user fees at the point of collection. TSM will also continue to address collection in rural, remote, and historically under-serviced areas such as First Nations' seasonal road communities through partnerships with PROs, communities, and service providers to define service models to the specific characteristics and needs of each region.

#### Recyclers

Manitoba companies recycle end-of-life tires and tubes for use in tire-derived products or fuel supplements. They also sell tire-derived products to markets in Canada and internationally. They submit claims to TSM for collection and recycling incentives. As of April 12, 2019, there is one recycler: Reliable Tire Recycling. It is TSM's intention to continue working with recyclers to ensure adequate recycling capacity to prevent build-up of backlogs of whole or partially processed end-of-life tires and tubes.

#### Consumers

Consumers purchase new tires from retailers. Most consumers leave their end-of-life tires with the retailer for disposal. In addition, they purchase and use recycled tire products. TSM will continue to operate a program that addresses all tires and tubes and provides consumers with accessible disposal points free of charge at TSM registered tire retailers and other generators throughout Manitoba. Consumer point-of-sale information is available to retailers and consumers to explain the program and products made from Manitoba's end-of-life tires. As an additional service to consumers, TSM also includes bicycle tire and tube collection free of charge at participating drop-off locations.

## PROGRAM PERFORMANCE AND REPORTING INDICATORS

TSM is committed to complying with the following legislative and annual reporting requirements.

#### **Act and Regulation**

The Waste Reduction and Prevention Act, CCSM c W40; Tire Stewardship Regulation, 2006; Guideline for Tire Stewardship 2006-01E.

#### **Products Covered**

All tires and tubes.

#### **Tire Stewardship Program Plan**

Approval July 1, 2018, to June 30, 2023.

#### **Act and Regulation**

Section 4(2)(h) of the Tire Stewardship Regulation states "the payment of salaries and other costs of government for the administration and enforcement of this regulation and of the Act as it relates to tires;

Section 16(1) of the Tire Stewardship Regulation states "Within 120 days after the end of the fiscal year, an operator must provide to the minister an annual report summarizing the program activities of the operator in the fiscal year and containing audited financial statements covering the program for the fiscal year."

Performance measures must be able to show both what is recovered and what is not. May include: sale and recovery data, municipal waste composition study results, surveys of public awareness, the amount of end-of-life tires and tubes collected by service providers, number of collection points, proportion of product to be managed, according to the principles of pollution prevention and 4Rs hierarchy. Measure, monitor and report on program performance, including meeting designated material recovery rate targets. Include total amount of product sold and collected, with recovery rate (or alternative approach); amount of product collected and processed by region if possible.

#### Stewardship Plan Approval Letter

Submit an annual report per the applicable regulation and guidelines. Retained earnings shall not at any time exceed an amount equal to one year's program revenue. Maintain a 90% or higher recovery rate for used tires collected. Provide updated information on collection sites/ depot locations.

#### PROGRAM KEY PERFORMANCE INDICATORS

#### Operational

- Total material generated
- Total material collected
- Percent of material recovered
- Total material collected per capita
- Marketable products as percent of total tonnes of material recovered

#### Accessibility

- Population coverage
- Percentage of Manitoba residents that have access to a collection site
- Number of collection sites or events
- Number of participating communities

- Percentage of population aware of the Program
- Communication efforts undertaken

#### **Financial**

- Total program cost per tonne
- Recycling costs per tonne
- Administrative costs per tonne
- Stewardship Programs cost per tonne





For every new tire sold in Manitoba a tire will eventually be discarded. Rather than taking up space in our landfills and posing a risk to human health and the environment, end-of-life tires are collected to be recycled into new products in environmentally responsible ways. To manage end-of-life tires generated in Manitoba, tire sellers remit steward-fees to TSM for new tires sold in the province. One hundred percent of fees collected from stewards go towards the operation of the tire stewardship program.

Properly managed end-of-life tires reduce environmental risk and create jobs and economic development in Manitoba. Manitoba's tire-derived products are sold locally and internationally.

TSM's program operating model is based on the requirements outlined in the Regulation and Minister's Guideline, as well as the historical, geographic, and diverse character of the province. TSM collaborates with all stakeholders to ensure collection and recycling capacity is matched to the province's hauling characteristics, seasonal access and relatively low end-of-life tire volumes compared to other markets in Canada and North America.

TSM's operating model is comprised of these two basic elements – Revenue System and Rate Setting Process:

#### **REVENUE SYSTEM**

TSM has successfully implemented a retail-based funding model that is the only point though the distribution chain that can ensure a level playing field, preserve the financial integrity of the program, and be fair to all parties. TSM will continue to operate its revenue system supporting variable rates based on the tire type sold that are remitted by registered retailers to TSM.

#### **RATE SETTING PROCESS**

TSM has developed policies for reviewing and setting collection, processing, and steward-fee rates to ensure the efficient, effective, and sustainable operation of the tire stewardship program. TSM's approved program plan highlighted the need to address three major rate-setting areas that may require adjustment from time to time: collection incentives, processing incentives and steward-fees.

#### STEWARD-FEES

As rates must be sufficient to cover the entire costs of the program, it is TSM's intention to continue the sound management over spending and the setting of steward-fees for the duration of this proposed program plan. By policy, to change the steward-fees, a stakeholder consultation, and a minimum of a 90-day notice is required.

#### **RECYCLING INCENTIVES**

Recycling incentives encourage the appropriate storage, collection, and processing of discarded tires, as well as the manufacturing of new recycled tire products in Manitoba in the following manner:

- The Community Scrap Tire Storage Incentive encourages local governments and First Nations to appropriately store Manitoba tires at their landfill transfer stations where they are collected at no charge.
- **Collection Incentives** encourage registered tire recyclers to collect Manitoba tires, including scheduling, loading, hauling, unloading and assuming liability for tires held in their possession until processed and sold.
- **Processing Incentives** encourage registered recyclers to reduce whole Manitoba tires into processed material for end sale or further manufacturing into recycled tire products.

Incentives can depend on a variety of factors that recyclers may or may not have control over. To safeguard against inefficient or poorly managed operations TSM will continue to benchmark its recycling credits against other provincial tire recycling programs and out-of-province recyclers to ensure its credits are in-line with comparable programs and markets. TSM also conducts independent audits to monitor recycler profitability and compliance.

TSM may adjust any of these three recycling incentives as necessary to ensure the sustainable, effective, and efficient storage, collection and processing of end-of-life tires. By policy, TSM will provide 90-day notice to lower incentive rates. TSM can raise rates immediately if warranted. Disagreements will be referred to the Mediation and Arbitration Guidelines that form part of TSM's recycler agreement which are binding on both parties.

#### **DISPUTE RESOLUTION PROCESS**

TSM is committed to resolving disputes that may arise with any program partner in a timely, fair, and impartial manner through both mediation and arbitration for those rare occasions where even with the best of mutual intentions parties disagree on the methods and manner of program implementation.

TSM has adopted both Mediation and Arbitration Guidelines approved in its first program plan in 2007. These Guidelines provide a transparent pathway that specifies process, roles, and timing.

#### **BUDGET AND RATE REVIEW CONSIDERATIONS**

TSM financial projections indicate that program sustainability can be maintained through the continued sound TSM management of spending and the setting of steward-fees for the duration of the 2023 – 2028 Program Plan. A 90-day notice is required to change steward-fees or reduce collection and recycling incentive rates. As such, adjusting for increased volume and revenue, TSM will be guided by the level of compensation for collection and recycling in the program plan 2023 – 2028 financial forecast. TSM's normal practice is to review steward-fees and the rates of assistance on an annual basis.

TSM PROGRAM PERFORMANCE SUMMARY 2017 - 2021						1
	2017	2018	2019	2020	2021	5-Year To- tal/ Average
Material Generated (Tonnes)	21,475	21,381	20,717	20,847	21,411	21,166
Material Collected (Tonnes)	18,364	18,177	17,835	18,611	20,648	18,727
- Per Capita (Kilograms)	13.7	13.4	13.0	13.49	14.89	13.7
Material Recovery Rate	86%	85%	86%	89%	96%	88%
Total Program Cost (Tonnes)	\$371	\$335	\$317	\$362	\$387	\$354

#### **DATA MANAGEMENT AND INFORMATION TECHNOLOGY**

TSM consults with other stewardship programs and various information technology companies to compare capabilities and functionality of their data management software. TSM has identified several desired enhancements and benefits for improving data management and information technology. As such, TSM's new custom data management software is expected to be fully operational in 2023 with systems upgrades for online portals, automating processes, haulers app, processor claim procedures, financial accounting system integration, and incorporation and enhancement of analysis reporting.

Benefits of developing and implementing the enhanced software include superior communications with stakeholders, reduced paper usage, postage, and the associated cost; convenience for all program registrants; better data capturing, tracking, and verification; improved reporting capabilities to assist analysis and decision making; and increased efficiency and effectiveness of the program.

#### TIRE DERIVED PRODUCTS

In accordance with the Minister's Guideline for a Tire Stewardship Program, TSM also subscribes to the Tire Derived Product (TDP) hierarchy of end-of-life tire use to promote the continued recycling of tires available in Manitoba. These products included highly processed materials such as crumb rubber and powder for use in producing new products with recycled rubber content; Fabricated products such as blasting mats, traffic cone bases, etc.; Type A and Type B Tire shred produced as an alternative to granular material; and whole or shredded tires used as tire derived fuel (TDF) to supplement other fuels in industrial applications.

#### **MARKETS**

Various domestic and international Markets purchase tire-derived products from Manitoba recyclers for end-use, resale, or for further manufacturing into new products. It is TSM's intention to continue to promote economically viable end uses and market applications for end-of-life tires, through both existing and new product and market opportunities for Manitoba.

#### **COMMUNITY GRANTS**

The Tire Stewardship Manitoba (TSM) Community Demonstration and Innovations Grant Program provides funding for the use of recycled tire products made from Manitoba tires in projects delivered by local governments, post-secondary and research institutions, community and youth groups, Indigenous organizations, and First Nation communities. Matching grants up to project levels of \$5,000, \$10,000 or \$20,000 are provided to communities and non-profit organizations to use and benefit from a wide range of recycled tire products. The grant's objectives and requirements were developed in consultation with recyclers, research institutions and other industry and program stakeholders to ensure that maximum value and preference is given to products made from Manitoba end-of-life tires.

#### **COMMUNICATIONS AND PUBLIC AWARENESS**

TSM works to engage and educate Manitoba residents. Over the years we have evolved to include additional communication channels such as digital marketing, awareness campaigns, social media, in-person events, as well as an online survey to engage directly with the consumer. The key message focused on "Who we are" as an organization and "The value of what we do".

Those who participate in the survey learn more about the first "R" Reduce through tire health, safety, and maintenance as well as "What happens to your tires", and information on tire derived products, processed and manufactured right here in Manitoba.

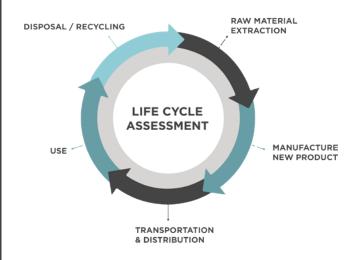
TSM will continue its successful public awareness and education partnership with the Tire and Rubber Association of Canada's "Be Tire Smart Campaign" www.betiresmart.ca. The campaign conducted by TSM provides consumer education materials to extend tire life and reduce the generation of end-of-life tires in Manitoba.





#### LIFE CYCLE ASSESSMENT FOR MANITOBA END-OF-LIFE TIRES

Tire Stewardship Manitoba is committed to promoting best practices for the management of end-of-life tires in Manitoba. To this end, a life cycle assessment of tire recycling in Manitoba was conducted for the study period of 2017 to 2020 to present the best estimates of environmental performance for end-of-life tire management in the province. The report compares impacts from program activity against impacts of competing products that may be avoided or displaced by using tire-derived materials. The net comparison between these two amounts represents an estimate for the potential benefits of end-of-life tire management. The study found that Manitoba's short overall transport distances and clean electricity grid produce relatively small impacts and a net environmental benefit for tire recycling in the province. It is TSM's intention to periodically update this study and report its findings.











#### FIRST NATIONS AND REMOTE COMMUNITIES

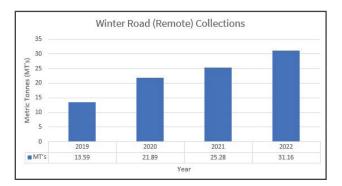
TSM has taken special interest to register First Nations and remote communities for tire storage and collection. These communities are generally located in areas of the province that were historically underserviced. TSM has allocated resources and built partnerships with these historically underserviced communities together with Manitoba PROs, and provincial and federal governments. Although progress has been made removing tires from remote and First Nations communities, it is TSM's intention to fully integrate communities where there are currently little or no tire recycling opportunities into the province-wide network for tire collection.

Manitoba's tire recycling program has met the challenge of removing tires from registered First Nations, northern and remote communities where all-weather road access has made collections routine, collecting 593,448 (PTE) since 2008 from the community registrants. Achieving this success for communities with rail or seasonal road access only has historically been much less attainable.

In partnership with other PROs, TSM continues to assist in developing resources and removing or managing materials such as used oil, batteries, electronics, household hazardous waste, multi-materials, thermo-

stats, and end-of-life tires from Northern First Nations communities.

To further these efforts, TSM will continue with our partners to identify additional First Nations and remote communities willing to engage in tire recycling and meet the necessary requirements under TSM's Community Tire Storage Incentive Program. The program provides a 50-cent per tire incentive to the community to support their efforts to manage and store end-of-life tires in addition to the free hauling arranged by Manitoba's tire recyclers that all TSM registered communities receive.



#### TSM REGISTERED FIRST NATIONS, NORTHERN AND REMOTE COMMUNITIES

Town of Churchill

City of Thompson

City of Flin Flon

Town of Gillam

Town of Grand Rapids

Town of Leaf Rapids

Town of Lynn Lake

Town of Snow Lake

Town of The Pas

Seymourville Community Council

(Hollow Water Regional Waste Site)

Cormorant Community Council

Mallard Community Council

Sioux Valley Dakota Nation

Cross Lake Band of Indians

Meadow Portage Community Council

Peguis First Nation

Wabowden Community Council

**Duck Bay Community Council** 

LUD of Cranberry Portage

Waterhen Community Council

St. Theresa Point First Nation

Bloodvein First Nation

Wasagamack First Nation

York Factory First Nation

Garden Hill First Nation

Sayisi Dene First Nation

Canupawakpa Dakota Nation

God's Lake First Nation

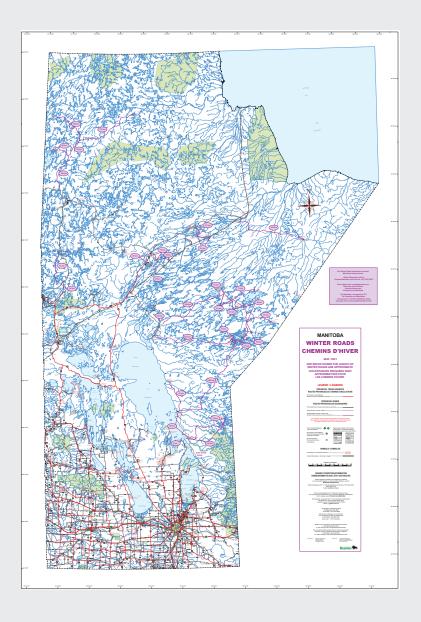
Bunibonibee Cree Nation

Camperville Community Council

Tataskweyak Cree Nation

Sandy Bay Ojibway First Nation

Black River First Nation



# TSM PROGRAM PLAN 2023-2028 FINANCIAL FORCASTING

It is TSM's intention to continue sound fiscal and program policy measures to maintain the stabilization reserve no greater than annual program revenue for the duration of the 2023 – 2028 program plan.

TSM manages its program finances to ensure efficient, effective, and sustainable program operations and the environmentally responsible recycling of tires. Although there are many factors that can influence revenue and expenditure forecasting, TSM has taken steps to manage finances to limit unexpected expenditures as much as possible. Revenue trends are less predictable as consumer preferences for winter tires, new car sales and economic growth can change financial outcomes from one year to the next.

An increase or decline in new tire sales is the most direct cause of an unexpected variance of predicted revenue, particularly in the passenger/light truck (PLT) tire category. Winter tire and new car sales can also create a larger gap between revenue and direct expenditures as end-of-life tires most often do not become available for recycling at the time of sale. These factors add to the number of tires that are currently on the road, held in storage for later use or in recyclers' inventories. The collection and recycling of all tires and tubes must be included in TSM's financial planning.

The TSM Stabilization Reserve is restricted to managing the organization's finances. A period of decline or growth in stabilization reserve holdings will most likely indicate a short-term change in market trends without adjustments to program recycling incentives or steward-fees being made. TSM will continue to monitor and apply sound management to reserve holdings, revenue, and recycling costs by tire type during the 2023 – 2028 Program Plan.

TSM revenue also includes investment income generated from the stabilization reserve. The investment income may add to the stabilization reserve or provide TSM with revenue to avoid raising steward-fee rates when the revenue generated for specific tire categories may not match recycling costs for those tires in any given year.

It is TSM's intention to continue sound fiscal and program policy measures to maintain the stabilization reserve no greater than annual program revenue for the duration of the 2023 – 2028 program plan.

#### 2022-2028 FINANCIAL PROJECTIONS

REVENUE	FY2022	FY2023	FY2024	FY2025	FY2026	FY2027	FY2028
Steward-Fee	\$6,910,000	\$7,048,200	\$7,189,164	\$7,332,947	\$7,479,606	\$7,629,198	\$7,781,782
Interest	\$190,000	\$193,800	\$197,676	\$201,630	\$205,662	\$209,775	\$213,971
Total Revenue	\$7,100,000	\$7,242,000	\$7,386,840	\$7,534,577	\$7,685,268	\$7,838,974	\$7,995,753
RECYCLING INCENTIVES							
Processing	\$3,480,000	\$3,514,800	\$3,549,948	\$3,585,447	\$3,621,302	\$3,657,515	\$3,694,090
Collection	\$2,645,000	\$2,671,450	\$2,698,165	\$2,725,146	\$2,752,398	\$2,779,922	\$2,807,721
Municipal Storage	\$97,000	\$97,970	\$98,950	\$99,939	\$100,939	\$101,948	\$102,967
Subtotal	\$6,222,000	\$6,284,220	\$6,347,062	\$6,410,533	\$6,474,638	\$6,539,385	\$6,604,778
Gross Margin	\$878,000	\$957,780	\$1,039,778	\$1,124,044	\$1,210,630	\$1,299,589	\$1,390,975
STEWARDSHIP PROGRAMS							
Community Demonstration Grants	\$100,000	\$101,000	\$102,010	\$103,030	\$104,060	\$105,101	\$106,152
Public Education Program	\$75,000	\$75,750	\$76,508	\$77,273	\$78,045	\$78,826	\$79,614
Special Projects	\$70,000	\$70,700	\$71,407	\$72,121	\$72,842	\$73,571	\$74,306
Subtotal	\$245,000	\$247,450	\$249,925	\$252,424	\$254,948	\$257,497	\$260,072
ADMINISTRATIVE EXPENSES							
Administration and Corporate	\$633,000	\$639,330	\$645,723	\$652,181	\$658,702	\$665,289	\$671,942
Subtotal	\$633,000	\$639,330	\$645,723	\$652,181	\$658,702	\$665,289	\$671,942
Total Expenses	\$878,000	\$886,780	\$895,648	\$904,604	\$913,650	\$922,787	\$932,015
Net Operating Surplus(Deficit)	\$0	\$71,000	\$144,130	\$219,440	\$296,980	\$376,802	\$458,960
Reserve Beginning of Year	\$3,839,619	\$3,839,619	\$3,910,619	\$4,054,749	\$4,274,189	\$4,571,169	\$4,947,971
Reserve End of Year	\$3,839,619	\$3,910,619	\$4,054,749	\$4,274,189	\$4,571,169	\$4,947,971	\$5,406,931

#### **Financial Forecast Assumptions and Notes**

- 1. TSM 2022-2028 Financial Projections based on TSM's approved FY 2022 Budget.
- 2. Revenue estimates for FY 2023 to FY 2028 based on average annual growth equal to 2.0% per year and TSM Steward-Fee Schedule A effective July 1, 2021.
- 3. Expenditure estimates for FY 2022 to FY 2028 based on average annual growth equal to 1% per year and TSM Recycling Incentives effective October 1, 2020.
- 4. TSM stabilization reserve results from an excess of revenues over expenditures from the program's contingency budget. TSM has restricted the reserve to manage the organization's finances. The amount, up to one-year's revenue equivalent, is subject to change at the discretion of the Board of Directors.
- 5. Forecast numbers may differ slightly due to rounding.

## GLOSSARY OF TERMS

- "Act" means The Waste Reduction and Prevention Act, as amended from time to time
- "AG" means agricultural tire.
- "Blast Mat" means a mat derived from end-of-life tires and used to suppress the shock and spread of debris during explosive demolition.
- "Board" means the board of directors of the corporation.
- "Chair" means the chair of the board of directors.
- "Collection" means the collection of end-of-life tires from registrants in Manitoba.
- "Collection Incentive" means the financial incentive, as from time to time determined and payable by TSM to the recycler or processor for the collection and transportation of tires from a registered retailer or registered generator to the recycler or processor.
- "Collector" means the recyclers or processors themselves or haulers who enter into business relationships with recyclers or processors to pick up discarded tires from retailers and generators for delivery to recyclers or processors.
- "Corporation" means Tire Stewardship Manitoba.
- "Crumb Rubber" means a recycled rubber product with granular consistency produced from end-of-life tires.
- **"Environmental Laws"** means any and all applicable laws, statutes, regulations, treaties, orders, judgments, decrees, official directives and all authorizations of any department or body of any federal, provincial, regional or municipal government or any agency thereof relating to the protection of the environment.
- "Generator or Registered Generator(s)" means an organization that generates end-of-life tires and is registered with TSM as a generator (e.g., auto dismantlers).
- "Hauler" means a person or corporation engaged in the business of collecting and transporting tires from registered retailers or registered generators to the recycler or processor.
- "Imported Tires" means whole tires or semi-processed tires generated from a location outside Manitoba.
- "Inventory" means whole tires, semi-processed tires, and finished products or residuals from TDP or TDF processes and includes both regulated and unregulated tires.
- "Member or Membership" means a member of the corporation.
- "Molded Products" means end-of-life tire derived recycled rubber molded products (e.g., sidewalk blocks, rubber flooring, road curbs, etc.)
- "MT" means medium truck tire.
- "OTR" means off-the-road tire.
- "PLT" means passenger and light truck tire.
- "Policies and Procedures" means the policies and procedures established by TSM and delivered to the stakeholders as amended from time to time.
- "Processing" means any process that transforms end-of-life tires into a tire derived product (TDP) or derived fuel (TDF) for which there is an end market.
- "Processing Incentive" means the financial incentive, as from time to time determined and payable by TSM to the recycler or processor to process eligible Manitoba end-of-life tires.
- "Producer Responsibility Organizations (PROs)" means not-for-profit industry organizations that manage programs to enhance material recycling in Manitoba.

- **"PTE"** means a passenger tire equivalent that weighs 11.5 kilograms, or as determined by TSM from time to time through end-of-life tire weight and characterization audits.
- "Recycled or Recycling" means any process that transforms end-of-life tires into new products for which there is an end market.
- "Registered Manufacturer" means an organization that has executed a manufacturer agreement with TSM.
- "Registered Retailer" means a person or corporation who has completed registration and entered into a retailer agreement with TSM to participate in the program.
- "Regulations" means the regulations passed pursuant to The Waste Reduction and Prevention Act.
- "Resident" means a person who generates an end-of-life tire from a residence in Manitoba.
- "Retailer" means an organization that sells tires or equipment with tires on it and is registered with TSM as a retailer.
- "Retailer Agreement" means an agreement in writing between TSM and a retailer by which the retailer has agreed to participate in the program.
- "Rubberized Asphalt" means a pavement material that consists of regular asphalt mixed with crumb rubber made from recycled tires.
- "Scrap Tire or Discarded Tire or End-of-Life Tire" means a tire that through use, storage, handling, defect, damage, or another similar circumstance can no longer be used for its original purpose.
- "Steward" means a steward of tires.
- "Steward-Fee" means the fee that retailers remit to TSM for every new tire sold and which funds the TSM program.
- "Steward of Tires" means the first person who, in the course of business in Manitoba, supplies a tire to another person; or a person who, in the course of business in Manitoba, uses a tire obtained in a supply transaction outside of Manitoba;
- **"Supply"** means to transfer a property interest by Sale, whether conditional or otherwise; exchange; barter; lease or rental whether with an option to purchase or otherwise; or gift, but does not include a supply that is effected solely to create a security interest within the meaning of The Personal Property Security Act or the Bank Act (Canada).
- "Recycler or Processor" means a participant engaged in an activity that converts the end-of-life tire into a tire derived product (TDP) or tire derived fuel (TDF) for which there is an end market and has executed a processor agreement with TSM.
- "Recycler Agreement or Processor Agreement" means the contract executed between TSM and a processor to formalize the terms of participation in TSM's tire collection and processing program.
- **"TDA"** means tire derived aggregate, which consists of shredded endof-life tires and is used in many civil engineering applications.
- "TDF" means tire derived fuel.
- "TDP" means tire derived product.
- "Tire" means a tire that is manufactured for use on the wheels or rims of a powered vehicle or a trailer that is designed to be towed by such a vehicle and includes a tube that is manufactured for use inside such a tire, whether the tube is supplied in conjunction with a tire or separately.
- "Tire stewardship program" means a waste reduction and prevention program for end-of-life tires approved under Section 6 of the Act. "TSM" means Tire Stewardship Manitoba.

Recycled **Tires Mean Durable** Flooring

Recycled tires in Manitoba can be used to make flooring products for agricultural, recreational and industrial use. Rubber flooring made from recycled tires is safe and low-maintenance.

Better workspaces, better for Manitoba.

Learn more at RecycledTiresMB.ca









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TIRE STEWARDSHIP MANITOBA PROGRAM PLAN 2023 - 2028

## **APPENDICIES**



APPENDIX A

SCHEDULE A - STEWARD FEES



APPENDIX B
WHAT YOU TOLD US

## SCHEDULE A | TIRE DEFINITIONS, STEWARD-FEES AND INTEREST SCHEDULE

#### **SCHEDULE A**

Tire Definitions, Steward-Fees and Interest Schedule Effective July 1, 2021

SECTION I: TIRE PRODUCT CATEGORIES INCLUDED - (Steward-Fee applicable)

Tire Type	Definition	STEWARD- FEE
Passenger Tires, Small RV Tires and Light Truck Tires	Passenger tires are designed for use on passenger cars, light trucks, small RVs and multipurpose passenger vehicles (MPVs), including sport utility vehicles (SUVs) and crossover utility vehicles (CUV's), and to comply with Canadian Motor Vehicle Safety Standard (CMVSS No. 109, 139). The light truck tire category consists of tires designed for use on consumer or commercial light trucks, under 10,000 lbs. Gross Vehicle Weight, and comply with Canadian Motor Vehicle Safety Standard (CMVSS No. 119). Codes found on the sidewalls of passenger and light truck tires are P (Passenger) and LT (Light Truck). Temporary spare tires are marked T (Temporary).	
Motorcycle, Golf Cart and All-Terrain Vehicle Tires	Includes all tires specifically designed for on/off highway motorcycles, motorcycle sidecars, motor bikes, mopeds, minicycles, golf carts, garden/lawn tractors and all-terrain vehicles.	\$4.00 + GST & PST
Forklift, Small Utility and Skid Steer Tires	Includes pneumatic forklift tires, press-on solid tires, Skid Steer tires measuring 16.5" and under, as well as RV Trailer and utility trailer tires marked ST (Special Trailer).	301 41 01
Small Farm / Ag Free Rolling and Implement Tires	Includes free rolling farm and implement tires deemed for use on farm equipment. Tires are usually identified with the sidewall marking IMP.	
Small Aircraft Tires	Tire weight 30 kg and under	
Medium Truck Tires	Rim Diameters from 15" to 24.5" Also commonly known as Commercial Truck Tires – Truck and Bus tires including Wide Base or Heavy Truck tires designed for truck/bus applications and Larger RV tires not marked "P or LT". All of which comply with Canadian Motor Vehicle Safety Standard (CMVSS No. 119).	\$14.00 +
Wide Base Skid Steer and Loader Tires	17.5" rim and over	GST & PST
Medium Farm / Ag Tires	Rears 24" rim & under Rears are designated with one of the following sidewall markings: R-1/R-1W/R-2/R-3/R-4/HF1/HF2/HF3/HF4	

#### **SCHEDULE A CONTINUED**

Tire Type	Definition	STEWARD- FEE
Large Farm / Ag Tires  Rears 25" rim and over Rears are designated with one of the following sidewall markings: R-1/R-1W/R-2/R-3/R-4/HF1/HF2/HF3/HF4		\$30.00 + GST & PST
Small Off-the-Road	Includes OTR Mining, Earthmover, Construction, Forestry (Skidder), Grader, Industrial tires up to and including size 23.5 – 25" tires	\$60.00 + GST & PST
Large Off-the-Road	Includes OTR Mining, Earthmover, Construction, Forestry, Grader, Industrial and other off-highway or on/off highway tires over size 23.5 – 25"	\$135.00 + GST & PST

For the purpose of determining eligible tire sizes within the tire type category, TSM will deem the following reference material as the reference authority – 2007 Tire and Rim Handbook of the Tire & Rim Association of the United States as amended from time to time.

The Steward-Fee is a supply of a taxable service. Tires supplied for use on fire trucks and ambulances and tires supplied to First Nations are not excluded from the Steward-Fee.

Qualifying equipment and users may be eligible for GST & PST exemptions on the Steward-Fee.

#### SECTION II: TIRE PRODUCT CATEGORIES <u>EXCLUDED</u> – (Steward-Fee not applicable)

The Tire Stewardship Regulation 2006 excludes tires not designed for powered vehicles (except for trailer tires which are designed to be towed by such a vehicle). Some examples of tires excluded from Steward-Fees are:

- Tires designed for use on bicycles or wheelchairs;
- Tires designed for use on a device designed to be moved by human power such as a wheelbarrow;
- Tires purchased for use on motorized mobility aids designed for the transportation of persons with a
  physical impairment (seller must retain a copy of the sales invoice that certifies this use and
  includes the name, address, telephone number and signature of the purchaser);
- Tubes that are manufactured for use inside a tire whether supplied with a tire or separately. Tubes will be managed by the program as part of a tire;
- Tires that ordinarily have a retail value of less than \$30.00. These tires will be managed by the program;
- Recapped and retreaded tires;
- Registered retailers who acquire new tires solely for the purpose of resale, provided they quote their TSM registration number to the retailer from whom they purchase the tire. However, if the tire is subsequently taken out of resale inventory and used for any business or personal use, retailers must remit the applicable Steward-Fee; and
- Retailers who ship to a non-resident to a location outside of the province. The retailer is required to retain documentation relating to the out-of-province delivery to substantiate non-remittance of the Steward-Fee for that sale.

#### SECTION III: INTEREST

Interest charges will be applied at a rate of 1% per month (12.6825% annually) compounded monthly and calculated from the date the interest became payable.



## WHAT YOU TOLD US

## RESULTS OF TSM'S 2023-2028 PROGRAM PLAN STAKEHOLDER CONSULTATION, RETAILER, COMMUNITY AND CONSUMER SURVEYS.

TSM is committed to a consultation process that allows all interested parties and affected industry stakeholders an opportunity to provide their valuable input toward the development of the 2023 – 2028 program plan. TSM's consultation process involved inviting input from key target audiences, including tire industry producers and sellers, other affected industries, communities, environmental organizations, and consumers.

To facilitate this consultation process, members of TSM's Stakeholder Advisory Committee representing generators, collectors, recyclers, industry consumers, environmental organizations, and communities who provide ongoing advice on program policy and operation were presented the draft program plan through a consultation webinar prior to the start of the six-week public consultation period that ran from October 19th, 2022, to November 30th, 2022.

Stakeholder groups, including the Advisory Committee, were notified of TSM's application to renew our program plan, and provided sufficient opportunity for stakeholder organizations to engage their membership, review the pro-

posed program plan and respond to TSM. TSM also surveyed retailers, communities, and consumers throughout the consultation period on the key value metric of tire recycling program importance.

Manitoba's approach to tire recycling is effective in managing all tires and tubes in the most cost-effective way for consumers, industry, and government. TSM's consultation demonstrated that stakeholder respondents are predominantly satisfied and agree with how TSM operates the tire recycling program in our province.

In two separate surveys virtually all program registrants (retailers, community storage site operators and other generators) and consumers responded near unanimously that the tire recycling program is very important to the environment and Manitoba.

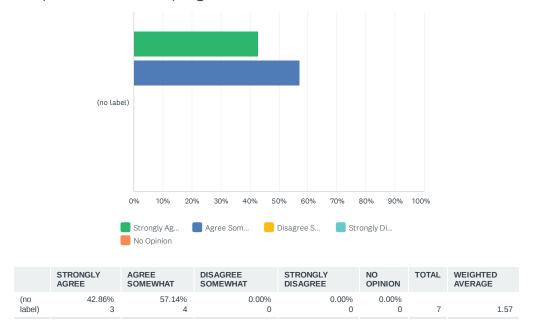
Results of the consultation can be found below and will assist TSM in presenting our 2023-2028 program plan renewal application to the Minister of Environment, Climate and Parks.

## TSM STAKEHOLDER

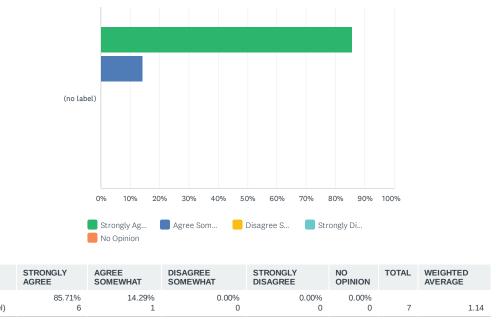
## ORGANIZATION CONSULTATION

## **WORKBOOK RESULTS**

Q1. Do you agree that the tire recycling program operated by TSM represents and respects the various program stakeholders and their interests?

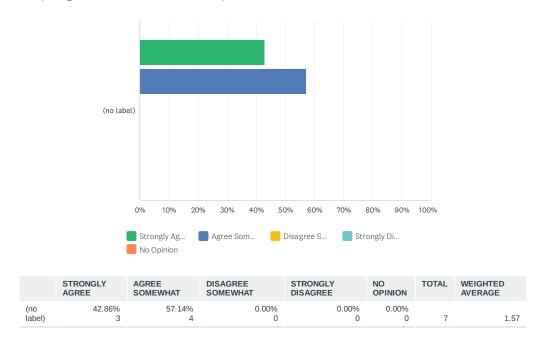


Q2. Do you agree that the Key Indicators required by government are sufficient to report on the annual performance of Manitoba's tire recycling program?

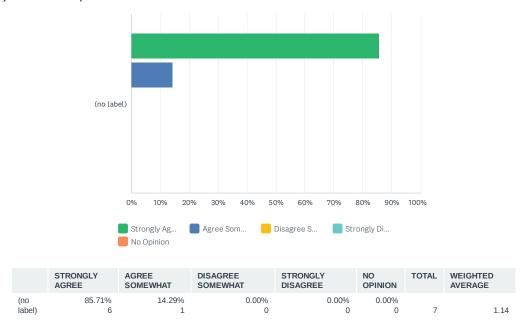


### STAKEHOLDER WORKBOOK RESULTS CONT.

Q3. Do you agree that TSM's Operating Model preserves the financial integrity of the program and is fair to all parties?

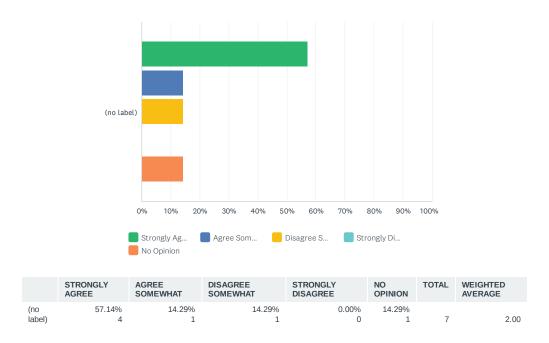


Q4. Do you agree that TSM's Market Development approach is on the right path to effectively recycle all tires generated while strengthening markets for higher-value products in Manitoba?



## STAKEHOLDER WORKBOOK RESULTS CONT.

Q5. Do you agree that TSM maintains the financial stabilization reserve in a manner sufficient to address future liabilities?



Q6. After reviewing the consultation documents and answering Workbook questions you may provide additional comments below.

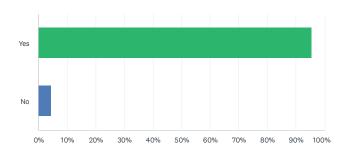
#	RESPONSES	DATE
1	none	11/25/2022 4:14 PM
2	Our members believe that Tire programs, including TSM need to evolve to be more transparent and move from recycling programs to being circular programs as an extension of the ESG efforts of leading members. This includes transparency for producers to know how many tires are picked up from their locations, and to whom the recycled content is sold to. This ultimately helps producers understand their impacts and have potential suppliers of products of recycled rubber. This innovation should also help drive value and the demand for recycled crumb. Ultimately, a healthy growing market for recycled crumb should help drive down costs. We also believe industry funded organizations including TSM should consider doing risk assessments, including understanding your dependency on service providers and establishing contingency plans. Finally, we encourage TSM to begin to start tracking your carbon footprint and establish strategies to begin decarbonizing, at least as an aspirational goal. Thank you for your interest.	11/23/2022 1:25 PM
3	Goodyear OptiTrac 900/60R32	11/23/2022 11:52 AM
4	TSM's program is outstanding; great job	11/23/2022 11:45 AM

## MANITOBA

## RETAILER AND COMMUNITY

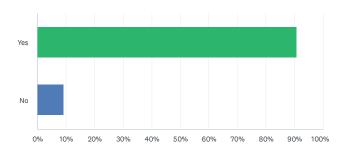
## **SURVEY RESULTS**

Q1. Did you know Tire Stewardship Manitoba operates Manitoba's tire recycling program?



ANSWER CHOICES	RESPONSES	
Yes	95.45%	84
No	4.55%	4
Total Respondents: 88		

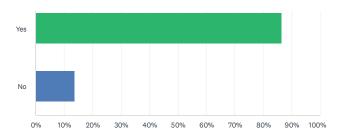
#### Q2. Did you know your organization is registered with TSM?



ANSWER CHOICES	RESPONSES	
Yes	90.91%	80
No	9.09%	8
TOTAL		88

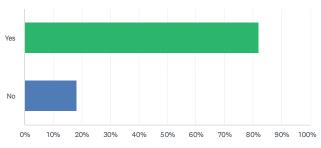
## RETAILER AND COMMUNITY RESULTS CONT.

Q3. Did you know that the TSM program provides year-round province wide end-of-life tire collection services to retailers and communities?



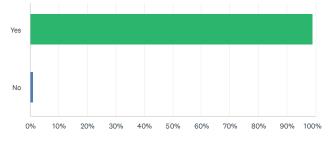
ANSWER CHOICES	RESPONSES	
Yes	86.36%	76
No	13.64%	12
TOTAL		88

Q4. Did you know your tires are being recycled to make products right here in Manitoba?



ANSWER CHOICES	RESPONSES	
Yes	81.82%	72
No	18.18%	16
TOTAL		88

Q5. In your opinion, do you think the Tire Recycling program is very important to the environment and Manitoba?



ANSWER CHOICES	RESPONSES	
Yes	98.86%	87
No	1.14%	1
TOTAL		88

## RETAILER AND COMMUNITY RESULTS CONT.

Q6. Thank you for your valuable input. Tire Stewardship Manitoba is proud of the work we do to ensure all end-of-life tires are managed efficiently and made into valuable products.

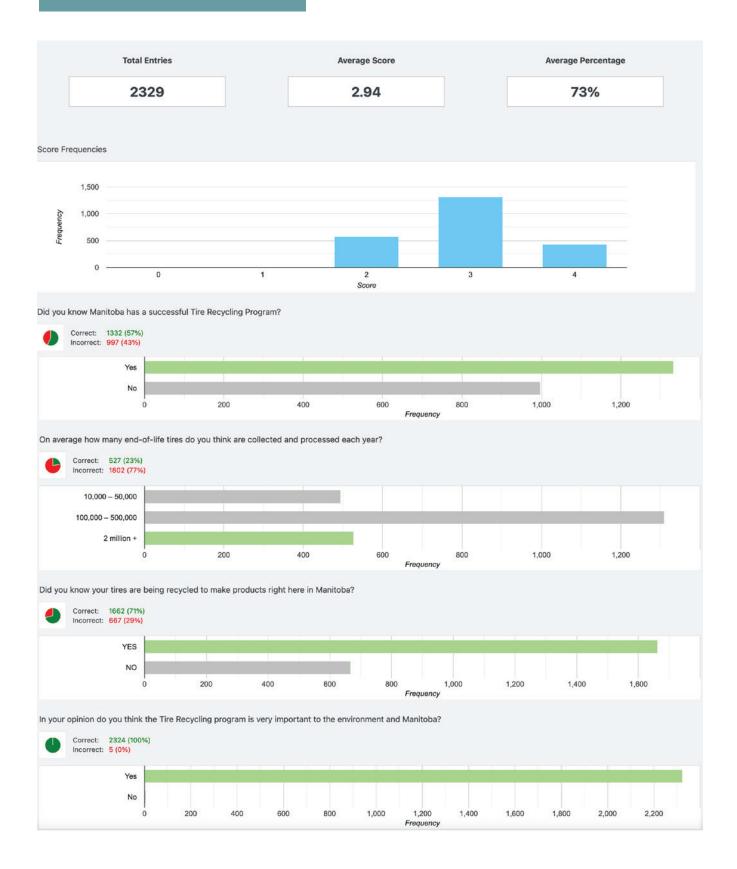
To learn more about what happens to your end-of-life tires please visit www. tirestewardshipmb.ca for information.

You may provide additional comments below.

#	RESPONSES	DATE
1	Please set up an E-Transfer or Credit Card Payment system for our monthly fees.	10/25/2022 11:07 AM
2	May I have a list of outlets that provide these end of life products. I get asked that often.	10/24/2022 7:17 PM
3	Sending in a paper form each month is a real pain. Please go paperless and set up your website for filling in information and taking payment.	10/24/2022 3:09 PM
4	Great project!	10/24/2022 9:37 AM
5	Changes need to made to the way reporting is done. Online reporting should be used rather than having to mail a form in.	10/21/2022 10:38 PM
6	This was a pointless waste of resources	10/20/2022 4:50 PM
7	online payments are not new technology PLEASE get updated so we can pay fees ONLINE	10/20/2022 4:20 PM
8	Please move to online reporting and submitting of payment!	10/20/2022 1:06 PM
9	I do know that there is collection services offered in Manitoba, however I was told that I was not on the pickup route for this service. I think it is not fair to some rural tire retailers that are selling tires and paying their tire levy fees and not able to use the service that them and their customers pay for.	10/20/2022 12:34 PM
10	One problem that we've experience is no one wants to pick up is old tubes large or small . WHY	10/20/2022 11:09 AM
11	I sent in our registration form our company in Nov 2021. Since submitting the form, we have gone though a name change. I am not sure how to make this change as their has been no confirmation or communications since. I have no idea how I submit our fees as I have not received any links to completing your fees. Are the fees collected my the manufacturer, or do I need to report sales?	10/20/2022 10:22 AM
12	We appreciate the environmentally conscious approach. When a customer asks about the charge, we explain to our customers why there is a tire levy and the benefits of the program.	10/20/2022 10:11 AM
13	do i have to pay you to come and get them my reg number was 6355 if i have to pay dont come	10/20/2022 9:49 AM
14	Would be much more efficient if we could submit monthly remittance via website and payment via website.	10/20/2022 9:45 AM
15	I truly believe The tire stewardship is needed by First Nations in protect the environment we live in. Tire stewardship has donated to God's lake first Nation in the form of gist such as T-shirts in the annual spring clean up which the members appreciated	10/20/2022 9:18 AM
16	the guys are always great on the phone to arrange pick up, and pleasant to deal with during pick ups on the yard	10/20/2022 9:17 AM

## MANITOBA CONSUMER

## **SURVEY RESULTS**





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