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To: The Connecticut Joint Committee on Environment February 13, 2015

From: Dick Cole, Executive Director
New England Tire & Service Association

I am sorry that I am unable to attend the public hearing on February 13, 2015 before the Connecticut Joint Committee on Environment on SB 869 concerning An Act Establishing A Tire Stewardship Program. I have been in the automotive repair business since 1963 and owned my own shop for 16 years before becoming the NETSA Executive Director in 2003.

We participated in the January 21st & 22nd two day 2015 Tire Stewardship Dialogue Meeting, presented by the Product Stewardship Institute and the CT DEEP at the DEEP Headquarters in Hartford. Our conclusion from the meeting is that Tire Stewardship is **burdensome, expensive and unnecessary**. Thus, NETSA and our 517 members (91 in CT) are opposed to Bill SB-869.

We found Tire Stewardship to be **burdensome** as it was explained in detail by Andrew Horsman, Ontario Tire Stewardship. He said that his unit reports to the Provincial Minister of the Environment who has complete authority concerning the Stewardship Program. (CT-869 Sec 2 gives the CT Commissioner of Energy and Environmental Protection similar authority. (e) "shall approve any plan" and "shall modify" the plan and then "approve such modified plan.") Mr Horsman also stated there are 18 Classifications of tires with separate fees for each classification. He stated "they are a monopoly" and that Government enforcement is the key to their system. NETSA believes you only have to look at Bill SB 869 to see how burdensome it would be to Manufactures, Distributors, and Dealers.

We also found that Tire Stewardship is **expensive**. Andrew Horsman stated that the Ontario cost per tire is \$5.43 vs. costs in the US are around \$3.00 per tire. Ontario pays incentives to 1) Collectors 2) Transporters & 3) Processors. Ontario is currently paying out for 10% more scrap tires than there are new tires being sold in Ontario. Thus, people are making/saving money by bringing scrap tires into Ontario that weren't originally purchased there.

Last and most important, we found that Tire Stewardship is **unnecessary**. PSI concluded at the Meeting that there are three Scrap Tire Problems.

- 1) Will there be enough markets to use the number of scrap tires produced each year? The answer is YES. Currently there are more scrap tires needed in New England than are available locally. The markets are always changing, and the supply/demand free market system always has and will continue to work without added Government control and costs.
- 2) Illegally Dumped Tires (Trash). The USA had 1 billion scrap tires in stockpiles in 1990 but only 75 Million in 2013 and most of these are in two States, Colorado & Texas. Thus, the current system implemented and being used in most States, is working very well and doesn't need a major change that SB 869 would require.

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