



# **RMA Comments on the Tennessee Scrap Tire Program**

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# Rubber Manufacturers Association

- Represents the 8 US tire manufacturers
- Created scrap tire development program in 1990
- Focus on development of sound markets and management for 100% of annually generated scrap tires.



# RMA Tire Company Members





## Previous RMA Involvement

- Member of 2 previous Ad hoc committees on evaluating & recommending changes to the Tennessee scrap tire program
- Worked with industry group that developed suggested changes to existing program: recommendations were not implemented



## Issues at Hand

- Vast majority of the State tire fee is sent to/used by counties to manage scrap tires at their drop-off centers
- Many counties access a surcharge for the disposal of scrap tires at their locations
- This suggests that the economics and efficiencies of the system are not optimized



## Issue at Hand

- The overall cost of the scrap tire program is one of the most expensive in the country (state fee + retailers fee + surcharge)
- Overall situation has not changed in 10 years even though the state tire fee has been increased



## Issues at Hand

- State agency still unable to provide oversight to the program or market development program due to lack of funds
- Changes to the current program will only occur if/when the Counties and retailers allow changes to occur



# Conclusions

- Oversight on tire transportation (anti-dumping) is possible through manifesting and licensing of transporters and requiring that retailers only use a licensed transporter
- Allowing collection at point of sale should reduce the overall cost of the system
- Maintain centralized drop-off sites in rural areas
- Use tire fund for regulation enforcement, abatement and market development



# Contact Information

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