

Ontario Tire Collectors Association

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September 14, 2004

The Honorable Leona Dombrowsky
Minister of the Environment
12th Floor, 135 St. Clair Avenue West
Toronto, Ontario
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Dear Minister Dombrowsky:

Re: Ontario Tire Steward Plan – Presenting to WDO, September 15, 2004

It has come to our attention that OTS is submitting a scrap tire management plan to the WDO, and if approved by them, then it will be submitted to you. **We are writing to urge you to reject the plan.** Our rationale is divided into two parts: **(1) the OTS plan is unworkable and why a re-organization of the industry is not needed and (2) what a plan to fix the problem areas in the industry should contain.**

Before we address the OTS plan, here is a brief background on the state of scrap tire collection in Ontario. Ample collection capabilities exist and have so for the past 14 years as of the 175,000,000 Passenger Tire Equivalents (PTEs)¹ discarded in that time, only a few million are stockpiled (5 million according to the MOE). In terms of a diversion rate, 97%² of scrap tires in Ontario have been collected and properly handled over the past 14 years. Ontario should be proud of what has been accomplished with minimal government intervention in an industry that presents many challenges to society.

Currently, the approximate cost for collection and recycling of tires in Ontario is \$1.60³ per passenger/light truck tire and with a 94%-97% diversion rate. Instead, OTS is recommending that you adopt a plan that increases those costs to \$4.00 per passenger/light truck tire with a diversion rate of 85%.⁴

To further complicate matters, **the OTS plan clearly presents a future where 8%-16% of scrap tire generators will get a free ride** as collectors and processors are paid to pick up and recycle all passenger/light truck and truck tires, but that percentage of generators is expected to not pay. **Currently, the overwhelming majority, 99.99%, of generators pays to have their tires collected.** Ontario will only be taking huge steps backwards if you implement the OTS plan.

¹ 175,000,000 PTEs is based on the RAC's statement that 2002 had 13,600,000 PTEs and that growth is in the order of 2% per year. Working backwards to 1990 (Hagersville tire fire) and projecting 2003 numbers by using the 2% growth, the approximate number is 175 million PTEs (excluding Off-The-Road tires).

² Even the OTS plan points out in §2.5.4 current estimated diversion uses of scrap tires in Ontario are at 94% verified with 7% of that going to landfill.

³ The cost of tire collection and recycling of passenger/light truck tires in Southern Ontario is approximately \$1.50/tire and for Northern Ontario \$3.00/tire (based on figures reported by our members). Calculation for the province based on 94% of the tires from the South and 6% from the North.

⁴ OTS Scrap Tire Diversion Forecast: Year 1, Total Annual Diversion Uses 118,000 tonnes out of 139,000 tonnes Total Annual Generation = 85%.

The problems with scrap tire management in Ontario are neither with the collection nor processing capacity. **Where the problems do exist are in illegal dumping, lack of enforcement with appropriate penalties, Off-The-Road tires, and domestic markets for the recycled rubber.**

The following tables summarizes the various issues with tire collection and processing in Ontario and whether the OTS plan will create, solve or provide no change from the current market conditions.

	OTS Plan Addresses Potential or Current Problems	OTS Plan Creates New Problems	No Change
Collection - Passenger Tires Southern Ontario		YES	
Collection - Passenger Tires Northern Ontario		YES	
Collection - Truck Tires Southern Ontario		YES	
Collection - Truck Tires Northern Ontario		YES	
Free Riders – Generators		YES	
MOE Enforcement			No Change
Dirty Tires – Collection, Recycling		YES	
Run-Flats – Collection, Recycling		YES	
Stockpile Remediation		YES	
Illegal Dumping	Possibly	Possibly	Possibly
Changing Market Conditions	NO	YES	
Off-The-Road tires	NO	YES	
Domestic Markets for Recycled Rubber	NO	YES	

Perhaps you might have a different interpretation of the affects of the OTS plan; however, this other view needs to be proven. We see no benefit in dismantling a system that is working very effectively. What the industry needs is a plan that ties up the loose ends.

It is our understanding from Glenn Maidment that the plan to be submitted by OTS is in essence the same one from March, 2004. We have previously presented our concerns with that plan to the OTS and MOE, so, once again, here are several of the problems the plan will create or are inherent in the plan.

PART I

FIXED PRICING DOES NOT WORK

The root of most of the problems that will be created by implementing the OTS plan is in the use of fixed pricing. All tire generators are not situated 30 minutes from processing facilities; and they do not have the same types of scrap tires that those facilities can process. Processors do not accept both passenger and truck tires, and most certainly, few will accept dirty tires.

To be clear, **the \$0.90 per passenger/light truck tire in Southern Ontario and \$1.40 per passenger/light truck tire in Northern Ontario are priced too low for the vast majority of passenger tires that require collection.** Neither is the collection fee for truck tires as truck tires have far less salvage than passenger/light truck tires. However, changing those prices will not fix the problem.

Tire generators are not fixed, they are varied in the tires they have: types, condition, and sizes. Accessibility to the tires is critical, and most important of all is location. It is unfeasible to collect tires in the Muskokas for the same price as in Toronto. It is unfeasible to collect tires in Sault Ste. Marie for the same price as in Sudbury.

Several factors are taken into consideration when formulating a price for collection: distance from collector; type of tire (truck, car, agricultural, industrial); potential for salvage/actual salvage; condition – filled/covered with mud, sand, or gravel or clean; accessibility – how close can collection vehicle get, double handle – where tires must be carried/rolled around obstacles, in a ravine, outside, or inside; and to a lesser extent, quantity. These along with the costs of doing business: fuel prices, insurance, labour, training, equipment upkeep, etc. are critical in determining a fair price for providing the service of collection and appropriate handling of scrap tires, meaning those tires that can be recycled and those not suitable for recycling (certain industrial tires, very dirty/contaminated eg. filled with cement or foam) are landfilled.

Ontario has the processing capacity for the scrap passenger and truck tires generated; however, **almost every processor has different criteria for the tires they will accept.** Truck tires that cannot be recapped are those that are currently available for collection. Currently, Ontario has two processors who would accept truck tires: Chatham Rubber (Chatham), who can only process radial tires, and Tyretek Industries (Ottawa). Obviously, these two processors are a considerable distance from the majority of the scrap truck tires generated in Ontario. Therefore, the cost of shipping to either processor is considerable, and with all logistics companies using a fuel surcharge, the cost continues to increase. As mentioned previously, Chatham Rubber can only process one type of truck tire, so will the collector have to pay for the extra handling to sort the truck tires? Currently, collectors factor that into pricing of truck tires. A fixed price for collection will not work here.

Processors of passenger and light truck tires have different capabilities and produce different forms of recycled rubber. **Capacity for crumb rubber from passenger tires is at approximately 5 million per year. Tires must be clean, that is free of dirt, sand, and gravel. It is a case of garbage in, garbage out.** Tires from a number of auto recyclers and municipalities are dirty and must be directed to processors who will accept these types of tires. Most of the time, dirty tires travel a much larger distance than if they had been clean. A fixed price for collection will not work here.

Processors can only accept a limited amount of tires per day, so they set a schedule as to when collectors can bring tires in. This system works well for 8-9 months of the year, meaning that collectors can choose which processors are the most cost-effective to work with during this time. However, from mid-September through mid-January, the industry experiences a huge increase (over 200,000 tires/month) in the number of scrap passenger tires generated as consumers prepare for winter. If the only processor(s) that can accept tires is 500 km away, then this is where the tires are sent. A fixed price for collection will not work here.

To illustrate several of the other problems with the OTS plan, the following are a number of scenarios that will compare the current situation with how it would be handled under the OTS plan.

Please note that while these scenarios are reviewed in isolation, there are always several other factors that will effect decision making e.g. increases in fuel, insurance, poor salvages rates, etc. As the market currently operates, there are significant fluctuations in the percentage of salvage depending upon factors including, but not limited to, the weather, tire sales, and consumer confidence. When salvage drops below a certain percentage, it is impossible (not to use that word lightly) to break even on a customer who has been priced accordingly given their history of a decent level of salvage. As collectors, we have no control over the salvage levels; we can only ride the roller coaster. Also, **we can be affected at both ends, as a**

strong Canadian dollar lowers the value of exports, which are almost always conducted in U.S. currency.

As mentioned earlier, a significant challenge in the industry is the dramatic nature of tire availability throughout the year. To have the infrastructure in place to properly handle the increased tires in the Fall (mid-September through mid-January) requires some continuity throughout the year. The low volume of tires in the Winter (mid-January through mid-April) will almost always result in a loss over that time. This is how the industry has operated over the past 14 years: lose money for the first quarter, breakeven (maybe) the next, make a small profit (maybe) in the third, and finally make a decent profit in the fourth quarter, which we hope offsets the losses from the first three. **It is not that people operate their businesses inefficiently; it is just a challenging industry to work in.** The OTS plan will only make things worse.

PASSENGER TIRE COLLECTION

Current Situation

Collectors usually specialize in the types of generators they work with: small independent garages, large chains, municipalities, auto recyclers, etc. Prices are set based on various criteria, so two generators in the same city or town can have a large difference in price e.g. in the GTA, \$1.35 per passenger/light truck tire vs. \$2.00 per passenger/light truck tire.

Result

Generators generally pay a price that adequately represents how they “score” in the criteria. Remember that there is generally an overlap of 3-15 collectors within the same area, so a generator has plenty of opportunity to shop around for the best price.

OTS Plan

A fixed, flat rate is being applied that treats all generators the same.

Result

Only those generators with sufficient salvage rates will be collected from. Of course, this is one of the most important questions: how will generators transition through the program? Is it a free-for-all such that any approved collector can stop in and pick up a generator's tires? There will only be a small number of generators that collectors will be able to afford to pick up from, so what will be in place to protect a collector's customer base?

Fall

Historically, scrap tire generation from retailers doubles in the Fall as compared to Winter. The effect this has on the industry is that most processors receive more tires than they can process, in which case they must limit the tires they can accept. This problem generally lasts for 3 months each year. This can be further exacerbated when processors have equipment breakdowns or perform regular maintenance. If a blade change goes wrong with a shredder, it can be off-line for a day or two (every processor of tires uses a shredder even if they are producing crumb rubber), which can result in a backlog of 10,000-20,000 tires in that time.

Current Situation

When a processor limits their intake of tires, collectors have a few options:

- 1) Send tires to a processor much further away. This increases the cost of transportation and the outlying processors generally have a tendency to charge more. If the overall increase in cost is significant enough, collectors will increase their costs for collection.
- 2) Send tires to a processor in the U.S. This is accomplished at a much greater cost. Sometimes, there is a problem with overflow as well, so that only a limited number of tires can be sent. If the overall increase in cost is significant enough, collectors will increase their costs for collection.

- 3) Store tires on trailers at appropriate sites. Since tires must be stored for upwards of 3 months, and it may take 1-2 months to get through the backlog once processors are able to accept more tires in late January, the cost of transportation increases due to storage costs and extra shipping (to move the trailers from the storage area to the processor). If the overall increase in cost is significant enough, collectors will increase their costs for collection.

Result

Tires continue to be collected. Collectors respond to market conditions as needed.

OTS Plan

When a processor limits their intake of tires, collectors have no options. The prudent course of action, in a business sense, will be to not take the risk of collecting tires that will (A) cost more in terms of shipping or (B) will take up to 4 months to receive funds from OTS as the tires are stored and awaiting processing.

Result

Any generator that does not have sufficient salvage will not receive collection services.

Distance of Generator From Collector or Processor

Current Situation

Whether they are located in the GTA or in Huntsville, most retailers do not have much space to store tires, and the smaller independent stores may only be able to accommodate 30-50 tires. Collectors choose a variety of methods for picking up tires such as sending vehicles to the generator and loading the tires immediately (one ton, 5 ton, tractor-trailer) or leaving a trailer for the generator to fill.

Result

Distance is dealt with by generally finding the most-cost effective way to collect tires. Collectors do keep in mind that in charging too high of a price may result in tire dumping or that the competition will get the tires instead.

OTS

A fixed price places limits on how far a collector can travel or if salvage is too low, no collection services will be provided.

Result

Generators who are too far from a collector or a processor will not receive tire collection. Generators with low salvage will not receive tire collection services.

Dirty Tires

Current Situation

Any generator that has dirty tires is charged a higher fee to cover the increased costs. Collectors try to encourage generators to stop "producing" dirty tires because they are a huge inconvenience, and for the most part are unnecessary. Traditionally, some auto recyclers and municipalities are the primary sources; although, some stockpile remediation will have these tires as well.

Result

Collectors apply additional charges to cover the costs of properly handling/recycling dirty tires.

OTS

As no additional fees may be charged, collectors must pick up whatever tires are made available to them.

Result

If dirty tires are collected close to a processing facility that can accept them, they should be transported there. Dirty tires that are too far from an appropriate recycling facility will not be collected.

TRUCK TIRE COLLECTION

Truck tires have even more limitations on them than passenger/light truck tires as only two processing facilities currently exist. Unfortunately, both are at either southern ends of the province (Chatham, Ottawa) and only one (Ottawa) will accept both bias ply and radial tires. Also, generators will remove those tires that appropriate for retreading. Salvage of truck tires is very low.

Current Situation

To send tires to Chatham, they must be sorted to pull out the bias ply. Otherwise, prices are set accordingly for having to transport the tires to either destination.

Result

Truck tires are shipped to the appropriate facility and the price (\$10-\$12 per truck tire in Southern Ontario) covers the costs of collection, handling, and transportation for recycling.

OTS

The collection fee from OTS is very low, especially considering the lack of salvage. (In the March, 2004 plan, it is supposed to be \$6.00/truck tire for Southern Ontario and \$9.00/truck tire in Northern Ontario)

Result

Truck tires will only be collected from generators that are close enough to the processor to cover the costs of handling and transportation; therefore, the majority of Ontario (including the GTA) will not receive collection services.

OTHER

Fuel Increases

Over a 4 week period earlier this year, we experienced a 16% increase in fuel prices. The fuel market is rather volatile. Logistics companies implemented a fuel surcharge and most collectors either did the same or responded by increasing the price of collection.

Current Situation

As fuel prices affect almost everyone, our customers understand when something so far reaching happens. If the increases are significant, then a price change or surcharge is accepted by our customers as a legitimate response to the situation.

Result

If warranted, a price increase is accepted.

OTS

As fuel prices increase, collectors will have to wait for the once a year review period to have an opportunity to ask for an increase. However, as the program will have a limited source of income, some other part will have to be cut to accommodate the increased cost of collection.

Result

If no increase is forthcoming, collection services will have to be cut. More tires will not be collected.

Insurance

As with fuel, auto and commercial policies are increasing in cost every year. It is becoming far more difficult to obtain commercial liability and we are generally only given \$1,000,000 in coverage. Additional coverage is very expensive. For example a \$1,000,000 umbrella would cost \$8,000 for one year.

Current Situation

Some municipalities require a minimum of \$2,000,000 in commercial liability.

Result

As stated above, the extra \$1,000,000 is very expensive to obtain, so the Risk Manager is contacted and the situation explained. They have always reduced the requirement to \$1,000,000 in liability.

OTS

What are the commercial liability requirements?

Result

Unknown.

Run-Flats**Current Situation**

These tires are unable to be processed for recycling.

Result

These tires must be removed from the recycling stream and sent to landfill.

OTS

Are they included in the program?

Result

Who will pay to have these tires landfilled? Or will consumers' money be used to solve the tire manufacturers' problem?

Enforcement**Current Situation**

The MOE has been taking a more active enforcement role over the past two years.

Result

A more involved MOE has facilitated a greater stability in the tire collection and processing industry.

OTS

Presumably, the MOE will increase its enforcement efforts.

Result

No change.

OVERALL EFFECT

Dismantling of Collection Infrastructure in Ontario – Most tires will stop being collected

The overall effect of the OTS plan will result in many areas of Ontario not receiving any tire collection. Profit margins in the collection industry are very low with losses generally occurring in the winter months due to the low volume of tires available for collection. Currently, scrap tire collections fees are set based on the location of the generator, type of tires, salvage rate, etc.

For example, if a collector picks up tires from a used tire shop, which obviously salvage the re-usable tires, then you charge a higher rate than you would for a generator who has a decent percentage of salvage. **A very large percentage of small retailers and auto recyclers already salvage good tires either for their own resale or they will sell to used tire retailers.** So this group is also charged a higher price. **The OTS plan presumes that collectors receive all the reusable tires, when quite clearly, we do not.**

Under the OTS plan, all tire generators are treated the same. **No collector will go near a generator that does not have a decent salvage rate.** It simply will not be worth it to pick up tires at a loss. And this scenario only covers generators in Southern Ontario who are within an hour of a processor who will accept the tires.

The under valuing of tire collection and the lack of understanding by OTS would force collectors to operate at 125%-200% efficiency every day. The reality is that collectors must deal with traffic, vehicles in the way at a generator, double handling of scrap tires at the generator, processors that cannot accept tires, re-usable tire picking, bad weather, lack of tires, and tire sales to name some of the challenges.

No collector can afford to pick up tires from areas that are 2 hours or more away from tire recycling facilities. Also, those processing facilities that are 2 or more hours away from collection companies will not receive tires because of the cost of transportation.

While the collection fee for tires in Northern Ontario has been increased to \$1.40 per pte, this increase will not come close to covering the additional charges of transporting the collected scrap tires to an approved recycling facility. Whether it is tires from Kenora, Dryden, Thunder Bay, Timmins or Sault Ste Marie, the cost of collection and transportation is very high, and the salvage is very low.

There are two processors in Northern Ontario that collect their own tires. However, they do not cull good tires as, previously mentioned, the salvage rates are very low. **The costs they would incur to cull and transport the re-usable tires would never be covered by the money they would receive for the exported tires.**

Consumers Subsidizing Trucking Industry

As Collectors, we are also truckers; however, we do not think it prudent to have consumers of passenger tires subsidize consumers of truck tires. As clearly stated in the plan, truck tires are approximately 5 times the size and weight of car tires. However, the proposed fee paid by consumers of truck tires is only 1.5 times that of car tires (\$6.00 for truck tires to \$4.00 for car tires). **Truck tires are converted to 3,250,000 PTEs or 22.6% of PTEs to be recycled under the plan. Compare this to truck tires only accounting for 8%⁵ of the revenue for the plan.**

⁵ \$6.00/truck tire x 625,000 tires = \$3,750,000. When combined with the \$41,000,000 expected from passenger and light truck tires is \$3,750,000/\$44,750,000 = 8%. Of course, this assumes 100% collection of funds, which the OTS has made clear, is impossible.

Tires Currently Being Recycled are Excluded

The OTS believes that it would be too complicated to include anything other than car/light truck or truck tires. **This is unacceptable as most agricultural and some industrial tires are being recycled today. The current diversion rate is in the order of 97% including agricultural tires, industrial tires and tires on rims.** The program they propose represents a significant set back to the industry.

The tire recycling industry has evolved because as the processing capacity has increased, **a natural demand for feedstock has grown to include other tire sizes and types.** To suddenly exclude these tires from a regulated program will be a significant set back to consumers, collectors and processors. We expect that municipal landfills and transfer stations will become the holding areas for the agricultural and industrial tires. As these tires will be exempt from the OTS program and most collectors prefer to not handle them, **the cost for their proper handling and recycling will increase leading to illegal dumping.**

Domestic Markets for Recycled Tire Rubber

We realize the importance of encouraging the production of crumb rubber for use in value-added products; however, artificially lowering the value of the crumb by subsidizing it out of proportion to the rest of the markets in the US and Canada is a poorly thought out strategy.

Rubber has been recycled almost from the time it was created in the 1800's. Tires have been a problem because they are designed to be virtually indestructible and incorporate other materials such as steel and fibre. Certainly tire recycling technologies have become more efficient, but how do you create an increased demand for a product (tire rubber crumb) that has existed for the past 20 years? While we are uncertain of the answer to that question, we do know that lowering its market value by vastly increasing the subsidy from \$40-50/ton (current market) to **\$100/ton will only result in Ontario crumb plants undercutting producers in other jurisdictions.** That is how business works. Like water, the need for profit follows the path of least resistance, and it is much easier to take over an existing market than to start a new one. The result will be a closing of the border to Ontario crumb.

Stockpile Remediation (the best kept secret in Ontario)

It will probably come as a surprise that **most stockpiles are being remediated without taxpayers' money being used in the clean ups.** As the MOE is doing a better job with enforcement, landowners are cleaning up their messes whether they made them or not. Over the past 2 years, three significant stockpiles have been remediated by the landowner: Brampton (350,000-500,000 tires); Villa Nova (75,000-95,000 tires); and Uxbridge (20,000-25,000 tires).

Success with scrap tire clean ups is a double-edged sword. If the government promotes the good work it has accomplished without the use of taxpayers' money, then the general public will see that there has been a problem. **Such are the difficulties with a product (scrap tires) that is considered a waste and health hazard by most people, but is in reality a fantastic resource.**

Under the OTS plan, landowners will get a free ride as OTS will pay for all remediations, but no revenue will be collected. People need to be made accountable for their actions. If someone allows scrap tires to accumulate on their property, they need to pay for the clean up (as should the individual(s) responsible for putting the tires there). Most of the stockpiles remaining in Ontario are of a manageable size as it relates to the value of the property.

When someone has to pay for a clean up from their own pocket, they tend to make an effort to keep the costs as low as possible. Unfortunately, when clean ups are paid for by other organizations not related to the clean up, the costs tend to be greater than if the landowner was paying. To put it another way, governments or organizations with pools of funds seem more likely to either pay more upfront or renegotiate a contract if things "don't go as planned". So, if you prefer to have the work done cost effectively, it is best if those types of organizations steer clear of stockpile remediation.

Taxpayers' money has seldom been used in tire stockpile remediation, and we think that should remain the case. If the MOE can take action if and when a stockpile reaches the 10,000-15,000 PTE range, it will be much easier and cheaper to solve the problem. In implementing the OTS fee, while not officially a tax, it is the vast majority of taxpayers who will be paying, and their money should be treated with respect. In this case, do not waste it on paying for other people's mistakes.

PART II

PLANNING A DIFFERENT APPROACH

Currently, the scrap tire collection and processing industry in Ontario effectively incorporates the 2 Rs of Reuse and Recycle. Obviously, it is up to the tire manufacturers to focus on Reduce. We would like to present, in a simplified format due to time constraints, a different approach to solving the few remaining problems in the industry. Please note that these ideas have been presented to the OTS and MOE in previous correspondence in the winter of this year, and **we have tried to be involved in this process since December, 2002.**

The core of a successful plan for Ontario should include the following elements:

- Registration – collectors, processors
- Information Gathering
- Encourage Civil Engineering, Rubberized Asphalt
- Increase in MOE Enforcement

These four actions alone will almost entirely resolve the outstanding issues with tire collection and recycling in Ontario. **Sometimes workable solutions can be simple.**

Implementation

For the WDO to take positive steps towards implementing a scrap tire management program in Ontario, we suggest that the first action be in gathering data on the state of the industry. To make decisions appropriate for Ontario, accurate information is critical. Effective for January 1, 2005, all scrap tire processors and collectors should be registered with either the OTS or MOE. These companies are then to submit monthly reports in a timely fashion. As the data is compiled, the OTS will gain a better perspective on how the industry operates.

Concurrently, the Ontario Government will encourage domestic use of recycled tires such as in the use of dirty tires for civil engineering projects and clean crumb into asphalt where appropriate. The MOE will increase monitoring of collectors and processors to include bi-monthly inspections of all sites, and continue to encourage landowners to remediate their properties.

With only a small effort, Ontario will now have almost completed the tire recycling loop. The next steps will be to decide, based on the information gathered, what areas then need to be addressed. Has the domestic use of recycled tire rubber been increased substantially? Will new tire recycling initiatives be required for Off-The-Road tires? Should the OTS fund Amnesty Days for municipalities? In this way, the OTS and WDO will have implemented a wise approach without encumbering what is a very effective recycling system with unnecessary constraints on its ability to function. As the idiom states, slow and steady wins the race.

Where is the Money?

The minimal funds for these initiatives could be sourced from one or a combination of the following: Tire Manufacturers continue their stewardship role with annual funds for OTS; MOE continues to allocate funds for enforcement; Provincial Sales Tax be applied to the environmental fee currently charged by

generators. The funds from this new category for PST should be in the \$4 million - \$5 million range.⁶ We do not expect this simplified plan to cost anywhere near those amounts.

CONCLUSION

The OTS plan will create several problems in scrap tire collection and processing while addressing none of the existing ones. Ontario can have a plan that utilizes the existing framework without a large price tag. As scrap tire collection and processing has matured over the past few years, we are very close to having the best system in the world. Please do not dismantle the infrastructure that exists. It needs additions, not demolition.

Sincerely,

Ontario Tire Collectors Association

Original signed by

Mike Moffatt
President

Cc Board Members, WDO
Glenda Gies, WDO
Lois Corbett, MOE
Nicola Crawhall, MOE
Toby Barrett, MPP
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Board Members, OTS
Trevor Petit, OARA
Clarissa Morawski, CM Consulting
Glenn Warnica, OTDA

⁶ In the OTS plan, PST would have to be charged by the generators, so the province would end up generating approximately \$4,000,000 each year.