



*Recycling Council  
of Alberta*

February 28, 2011

Doug Wright  
Alberta Recycling Management Authority  
1310 Scotia 1 Tower  
10060 Jasper Avenue  
Edmonton, Alberta T5J 3R8

Dear Doug:

We understand there have been discussions regarding the potential application of tire-derived fuel (TDF) within the tire recycling program, and would like to provide input on this issue.

The position of the RCA is that the program should encourage and incent the highest level of recycling possible within the waste management hierarchy. Under the current program, this would mean the greatest incentive to durable end products manufactured utilizing recycled tire crumb. These products provide the greatest environmental benefits, along with local economic development.

TDF, and other energy recovery options, are not considered recycling, and fall low on the hierarchy. Similarly, low-end recycling uses such as tire shred for aggregate applications also fall well below manufactured products on the hierarchy.

It is important that Alberta's tire recycling program encourage high order recycling as a priority end-use in order to maximize the environmental benefits resulting from the program.

If you have any questions, I would be pleased to discuss this issue further.

Yours truly,

A handwritten signature in black ink, appearing to read "Jason London".

Jason London  
President

cc: Hon. Rob Renner, Minister of Environment