



USTMA CLIMATE POLICY POSITIONS

Policy	Support	Comments
Support objectives of the Paris Agreement to reduce CO2 emissions	YES	A combination of technology, market-based and policy solutions will be necessary to reduce CO2 emissions and advance toward climate goals, such as those of the Paris Agreement.
Support incentives for carbon efficient products such as fuel-efficient tires and tires that contain sensors or other performance tracking and communications technologies.	YES	USTMA supports policies that incentivize the purchase of fuel-efficient tires. USTMA supports policies that incentivize the utilization of tires with advanced technologies that offer drivers and fleets the ability to improve fuel efficiency through sensors and other performance tracking and communications technologies.
Support policies that promote the development of materials that have a lower carbon footprint than virgin materials	YES	Development of renewable and recycled materials in tire manufacturing can reduce CO2 emissions associated with the manufacture and transport of virgin materials. For example: <ul style="list-style-type: none"> • Renewable plant-based materials that can be grown closer to manufacturing facilities can reduce CO2 emissions associated with transport of natural rubber. • Pyrolysis and devulcanization of scrap tires to produce recycled carbon black produces significantly less CO2 compared to virgin carbon black.
Support fuel flexibility for alternative fuels, such as tire derived fuel (TDF), to prevent national waste disposal challenges	YES	<ul style="list-style-type: none"> • Markets for scrap tires are critical to keep tires out of landfills and stockpiles. • In 2019, 37% of the 250 million scrap tires generated were used as tire derived fuel (TDF). • Climate policy that disincentivizes TDF use by pulp and paper mills and cement kilns, the primary users of TDF, could create a national waste disposal challenge for scrap tires.
Support investment in research to develop sustainable infrastructure to better understand long-term benefits, performance, and environmental impacts	YES	Rebuilding America's roadways should be done with the future in mind to develop roadways that increase driver safety, reduce environmental impacts, and advance the circular economy. For example: <ul style="list-style-type: none"> • Use of rubber modified asphalt leads to quieter pavement, longer lasting roads, and advances the circular economy.
Support border adjustment mechanisms to promote competitiveness of U.S. tire manufacturing industry	YES	Tire manufacturing is a low energy intensive but highly trade sensitive industry. Border carbon adjustment can be an important tool to ensure U.S. manufacturers are not placed in a competitively disadvantaged position and to incentivize environmental performance improvements globally.
Support exemption for non-emitting feedstocks	YES	While USTMA members are researching the development and use of renewable and recycled materials, there continues to be a need for petroleum-based feedstocks to manufacture tire materials.
Support development of electric vehicles and the infrastructure to support electric vehicles.	YES	As with any new technological developments, additional research and development is needed to implement new technologies for electric vehicles. USTMA members are committed to research and development of tire technologies to advance the development of electric vehicles.