

DOCKETED	
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Description:	N/A
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June 8, 2026

To: California Energy Commission Staff:

From: Gavin McHugh

Re: SCADA Request for Clarification on Applicability of Tire Efficiency Regulations to Used Tire Sales

On behalf of the State of California Auto Dismantlers Association (SCADA), we appreciate the opportunity to comment on the proposed replacement tire efficiency regulations.

Based on our review, used tires appear to be expressly excluded from the program. The regulations define a "replacement tire" as a new tire sold or offered for sale in California and specifically exclude used and retreaded tires. As a result, SCADA understands that tires removed from end-of-life vehicles and sold by licensed auto dismantlers are not subject to the program's rolling resistance, wet-grip, testing, reporting, or other compliance requirements.

To avoid future confusion, SCADA respectfully requests confirmation that a licensed auto dismantler selling exclusively used tires is not considered a "tire retailer" for purposes of the program and is therefore not subject to requirements applicable to retailers of new replacement tires.

This interpretation is supported by the regulations' express exclusion of used tires and the program's focus on the new replacement tire market.

If you have any questions on our comments, you can reach me at 916-719-3773.

Thank you for your consideration and for the opportunity to participate in this rulemaking process.

The State of California Auto Dismantlers Association (SCADA) is a statewide trade association representing California's licensed automotive recyclers and automobile dismantlers. SCADA advocates on behalf of the industry before state and local government agencies, promotes environmentally responsible vehicle recycling practices, and works to ensure a fair and effective legislative and regulatory policy for licensed businesses engaged in the dismantling, recycling, and resale of vehicle parts and materials.

cc: SCADA Board of Directors