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*Comment Received From: Toyo Tire Holdings of Americas Inc.
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Comments on Tire Efficiency Rulemaking

Additional submitted attachment is included below.



Toyo Tire Holdings of Americas Inc.

3565 Harbor Blvd.
Costa Mesa, CA 92626

June 16, 2026

California Energy Commission

Docket Unit

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

Re: Comments from Toyo Tire Holdings of Americas Inc. on the California Energy Commission's Proposed Tire Efficiency Regulation.

Toyo is committed to reducing CO₂ emissions throughout the product lifecycle, and recognizes that the usage phase accounts for at least 80% of the total GHG emissions related to a tire's lifecycle. Toyo aims to contribute to a 20% reduction in Scope 3 GHG emissions per tire by 2030 compared to 2019 levels and we are accomplishing this by setting aggressive improvement goals for rolling resistance with each new product development cycle. As of 2024, our improvement efforts have already resulted in avoided emissions of 100 thousand tons of CO₂ emissions compared to 2019 levels.

Toyo is supportive of consumer information relating to rolling resistance levels. When consumers are provided reliable information about the impact their tire purchase decision will have on their fuel costs, it will naturally drive a shift in consumer preference that will result in significant reductions in energy consumption. We believe that establishing consumer information standards should be managed at the Federal level, but understand the rationale behind California not waiting for that to happen.

We do have concerns about the scale, scope, and timing of the proposal, and specifically the impact that it may have on consumer's choices in the market. The CEC proposes establishing a database of 'approved' tires by the individual 9-digit DOT code stamped on the tire. Given the number of unique tire products in the market and the number of manufacturers, this list could easily exceed 50,000 entries, and will be changing on a daily basis. We urge the CEC to consider if they have the bandwidth to manage and enforce such a large and dynamic list of 'approved' tires. In order to reduce the burden on industry and to have less impact on specialty applications, we recommend that the CEC focus on only the tire sizes that account for the top 80% of vehicle miles driven. The number of unique tire sizes that account for 80% of the total miles driven in California is approximately 20. There are approximately 10,000 unique tire sizes in the market that are



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potentially subject to this proposal. We urge the CEC to consider focusing only on the top 80% of miles driven, rather than the entire market. 80% of the improvement desired could be achieved with approximately 0.2% of the effort and it would be much more manageable and enforceable. A phased approach where initially only the tires that account for the top 80% of miles driven are subject to minimum performance standards could also be considered. This would allow time for the process to be established, enforcement protocols to be tested, and the benefits to be monitored. It would also allow time for the consumer information to impact purchasing decisions. If the CEC's estimates of product costs vs. fuel cost savings are accurate, then consumers should naturally drive the market towards lower rolling resistance products once they have access to the information.

Regarding the specific language of the proposal and the tires that are in-scope or out of scope, we have several concerns that have also been shared with the CEC by the USTMA:

Firstly, as a tire manufacturer, we are obligated to provide service parts available to our OEM customers. In the case of tires, this means that the car dealers and tire dealers who sell our brands must be able to sell an OE tire to a consumer who wishes to maintain the exact performance that their vehicle originally had by replacing the original tires with identical tires, or a consumer who needs to replace a single tire due to road-hazard damage. Original Equipment tires are developed in conjunction with the vehicle manufacturer to provide very specific vehicle performance. These tires must remain available for sale in the replacement market in California even if they exceed the minimum performance standard for rolling resistance.

Secondly, the definition of what winter tires are exempt from the proposal needs to be clarified. The language in the proposal exempts all tires that meet the requirements and carry the 3PMS symbol. This is an enforceable and reasonable class of tires to exempt, because the meaning of the 3PMS symbol is well defined and intended to represent tires that are suitable for use in severe snow conditions. Keeping these types of tires available in the California market is critical to safety, and should not be compromised. The language in the 'Initial Statement of Reasons' and 'Proposed Express Terms' is not consistent with the language in the NOPA. The language in the 'Initial Statement of Reasons' and 'Proposed Express Terms' would place in-scope many All-Weather and All-Terrain tires that are 3PMS rated. Placing these tires in-scope without an allowance for higher rolling resistance could reduce availability of these tires in the market, which would adversely affect safety and could result in consumers choosing higher rolling resistance, quicker wearing winter-only tire options. The language in the 'Initial Statement of Reasons' and 'Proposed Express Terms' is also unenforceable as it relies upon each individual brand's marketing of a tire rather than an objective metric like the 3PMS symbol.



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Thirdly, we concur with the USTMA's comments regarding light truck tires. There is currently no recognized standard for wet grip testing of light truck tires. Until a suitable standard and performance threshold is established, we agree that all LT tires should be out of scope. If the CEC were to adopt our proposal of focusing on the top 80% of miles driven, all LT tires would be excluded since they do not account for a large proportion of total miles driven in California.

Fourthly, We share the USTMA's concerns about abuse of the Limited Production exemption and offer these additional comments. This exemption is critically important to our brands, as we produce many unique niche products in small volumes. In order to keep the Limited Production exemption focused on niche applications and minimize abuse by unscrupulous tire importers, we urge the CEC to consider excluding the tire sizes that account for the top 80% of miles driven from being eligible for a Limited Production exemption. This would prevent unscrupulous tire importers from simply changing tire names or misreporting sales volumes on tire sizes that generally sell in high volumes in California.

Fifthly, We share USTMA's support for establishment of 'Tire Family Certification' and 'Compliance Margins and Measurement Tolerances.' As mentioned previously, the sheer number of tires that will need to be tested and reported on is quite large. Testing of 'worst case' sizes to represent a tire line is an established practice in the industry, as are compliance tolerances to account for test variation. We urge the CEC to consider incorporating these concepts into the proposal.

Toyo thanks the CEC for the opportunity to comment on this proposal.

Respectfully submitted,

Christopher Raglin

Director – Technical and Quality

cc:

Honorable Gavin Newsom, Governor, State of California

Wade Crowfoot, Secretary for Natural Resources, State of California

Nancy Skinner, Commissioner, California Energy Commission