



February 20, 2025

The Honorable Mike Johnson
Speaker
U.S. House of Representatives
Washington, D.C. 20515

The Honorable John Thune
Majority Leader
U.S. Senate
Washington, D.C. 20510

The Honorable Hakeem Jeffries
Democratic Leader
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Charles Schumer
Minority Leader
U.S. Senate
Washington, D.C. 20510

RE: USTMA Legislative Priorities for the 119th Congress

Dear Speaker Johnson, Leader Thune, Leader Jeffries and Leader Schumer:

As the work of the 119th Congress begins, the U.S. Tire Manufacturers Association (USTMA) and our member companies are determined in our efforts to collaborate with you to advance road safety, tire innovation, and grow manufacturing jobs in the U.S. We know our combined efforts help to support the American people and contribute to the safety of our roads and the health of our nation's economy.

USTMA prioritizes eight key policy areas that incentivize the expansion of advanced technologies and help American manufacturing compete globally:

- We request the exercise of the **Congressional Review Act to remove the final National Emission Standards for Hazardous Air Pollutants (NESHAP) rule on rubber tire manufacturing** published on November 29, 2024;
- We ask for the **preservation of vital global supply chains of imported raw materials and equipment** required to manufacture tires in the United States, which is vital for U.S. commerce and national security;
- We urge you to **eliminate outdated tire testing regulations stifling innovation** at the National Highway Traffic Safety Administration (NHTSA), and to implement a Congressionally mandated consumer information program with performance standards for tires;*
- We support tax incentives to increase demand for **domestic manufacturing of retreaded tires** for commercial vehicles to grow American jobs, increase supply chain security, and enhance sustainability and energy savings;
- We support **infrastructure investment in safer roads** and smart civil engineering projects using rubber modified asphalt (RMA) and tire derived aggregate (TDA) made from recycled tire material;
- We encourage Congress to support funding to identify mitigation solutions for **roadway runoff** to ensure stormwater is protected as a valuable resource;
- We encourage Congress to ensure **fair, equal and standardized access to digital vehicle data** and infrastructure assets; and
- We support federal funding to develop **domestic sources of sustainable natural rubber**.

USTMA asks Congress to utilize the Congressional Review Act to remove the U.S. Environmental Protection Agency's (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) final rule on rubber tire manufacturing, published on November 29, 2024.

USTMA member companies are aligned with EPA's mission to ensure the preservation of America's clean air. Tire manufacturing facilities have long understood and complied with the existing NESHAP standards to reduce emissions of hazardous air pollutants from rubber mixers. In 2020, EPA determined after conducting a risk and technology review that the existing standard provides an ample margin of safety to protect public health and prevent an adverse environmental effect. However, despite EPA's own assessment, the agency added emission limits for total hydrocarbons and filterable particulate matter to the existing NESHAP rule. As a result, tire manufacturing facilities are required to install and operate numerous control devices known as regenerative thermal oxidizers, which demand a significant input of natural gas to combust pollutants, which in turn increases carbon emissions. The nine states that are home to the 94 rubber mixers at 11 tire manufacturing facilities and subject to this action are:

- Arkansas
- Illinois
- Kansas
- Mississippi
- North Carolina
- Ohio
- Oklahoma
- South Carolina
- Virginia

This final rule imposes significant financial burdens on tire manufacturing facilities and creates an adverse environmental impact – all while providing negligible environmental benefits. We urge Congress to take action to undo this final rule and limit the deleterious effects on the U.S. tire manufacturing industry, the U.S. economy and the environment.

The integrity of global supply chains is vital for the preservation and growth of tire manufacturing in the United States, American commerce, and our national defense as some raw materials and equipment required during the manufacturing process cannot be sourced domestically.

Any action that curtails the availability of the supply of raw materials and equipment essential for tire manufacturing in the U.S. would have a cascading negative impact on U.S. commerce and national security. A reliable supply of American manufactured tires is not only crucial for the movement of goods and people throughout the United States, but also to ensure the readiness of our military in securing our national defense. Congress must preserve existing supply chains and ensure that access to these raw materials and equipment is not jeopardized so that American tire manufacturing can continue to supply our nation's needs.

USTMA asks Congress to support NHTSA efforts to eliminate outdated Federal Motor Vehicle Safety Standards (FMVSS) tests and removal conditions, which are harming the global competitiveness of the U.S. tire manufacturing industry. USTMA also welcomes Congressional support for NHTSA to move forward with long overdue rules on consumer tire information and standards.*

We call on Congress to urge NHTSA to modernize safety standards to allow for adoption of more innovative technologies, enhance the performance of tires available in the U.S. market and give U.S. consumers access to higher performing tires already available in other global markets.

We advocate that NHTSA eliminate the bead unseating and plunger energy tests from the FMVSS. These tests were designed over 60 years ago for bias ply tires and do not deliver a safety benefit for today's modern radial tires. We also support the elimination of parasitic tread block chunking as a failure mode in the FMVSS 139 endurance test which will remove barriers that currently keep innovative products with superior performance from entering the U.S. market. In a 2019 advanced notice of proposed rulemaking, NHTSA acknowledged the potential need to remove these tests from FMVSS, however it has yet to act further.

We ask Congress to urge NHTSA to comply with the directives under Energy Independence and Security Act (EISA) and the Fixing America's Surface Transportation (FAST) Act and establish national regulations for tire consumer information and standards. * USTMA has long supported a singular, nationwide approach to tire information and standards to preserve industry competitiveness and fulfill the objectives of the laws enacted by Congress. In 2007, our trade association worked closely with Congress on language in EISA that would establish a national tire fuel efficiency consumer information program to educate consumers about the effect of tires on automobile fuel efficiency, traction and durability. Our organization also engaged with Congress on the FAST Act of 2015 to include the promulgation of regulations for tire fuel efficiency and wet traction minimum performance standards. However, NHTSA has not acted on either of the Congressional mandates. **In the absence of a federal framework set by NHTSA, states have begun to draft their own tire performance proposals, which would lead to a complex patchwork of state-by-state regulations that would burden the industry and restrict consumer access in the marketplace.** The need for NHTSA leadership is significant in this area, with consumer choice and the availability of appropriate tires to meet consumer needs at stake.

We support tax incentives to increase demand for domestic manufacturing of retreaded tires for commercial vehicles to grow American jobs, increase supply chain security, and enhance sustainability and energy savings.

Commercial tire retreading provides a highly effective way to recycle tires with many additional notable economic and environmental benefits. In addition to job creation, retreading reduces energy consumption, CO₂ emissions, raw material usage and tire disposal challenges. Despite these advantages, retreading of commercial tires has steadily decreased over the last 25 years.

USTMA encourages Congress to provide financial incentives for domestic tire retreading. This could be accomplished through a manufacturing grant to tire retreaders or as a tax credit to purchasers of domestically retreaded tires. Congress has an opportunity to lead by example by requiring the purchase of domestically retreaded tires for the federal fleet and any fleet under federal contract, where possible, given precedent for such policies.

We support investment in the expansion of sustainable and circular market solutions for end-of-life tires, such as use of rubber modified asphalt (RMA) in infrastructure projects and research to assess the benefits of tire derived aggregate (TDA).

Each year over 250 million scrap tires are generated in the U.S. While tires remain one of the most recycled products in the country, ensuring the continued growth of end-use markets which consume annually generated scrap tires is essential to prevent tire stockpiles and illegal dumping. USTMA

recognizes both RMA and TDA have great potential for market growth given their proven benefits in civil engineering.

We urge Congress to identify RMA as a preferred pavement material for federal projects and support funding for research to further study RMA use benefits, including supplementing preliminary findings of reductions in environmental impact when using RMA.

RMA is a mixture of recycled ground tire rubber and asphalt that provides proven economic, environmental and performance benefits. RMA increases pavement service life and reduces road maintenance activities, leading to significant cost savings compared to traditional asphalt. It reduces CO₂ emissions by 32%, lowering energy consumption over the lifetime of pavement as compared to traditional asphalt. RMA also provides performance and safety benefits by increasing skid resistance, reducing tire wear, reducing road noise, and reducing road spray in wet conditions.

USTMA urges Congress to fund research and demonstration projects using TDA in federal, state and local construction projects. TDA (large shreds of end-use tires) can be reused as cost-effective infill material for roadside embankments, retaining walls and stormwater infiltration galleries. The use of TDA realizes significant benefits, including reducing costs compared to traditional mined construction materials and improved drainage in stormwater infiltration galleries. Studies show TDA use in infiltration galleries can reduce metals loading in stormwater. TDA used under railroad tracks also has proven effective and cost-efficient in mitigating ground vibrations from rail lines, a significant benefit to neighboring communities.

USTMA urges Congress to support funding to identify, develop and expand the use of mitigation solutions for roadway runoff.

Rain and snow melt causes materials from vehicles, road and highway construction and maintenance to be washed into water bodies. To ensure stormwater is protected as a valuable resource, we encourage funding for research to identify, develop and expand the use of mitigation strategies and technologies to treat stormwater runoff from roadways. We also support the deployment of existing technologies that provide stormwater filtration before roadway runoff enters waterways, including stormwater bioretention technologies, use of permeable pavements and increased street sweeping in urban areas. Rebuilding America's roadways should be done with the future in mind to ensure reductions in environmental impacts, including mitigation for roadway runoff.

We support equal and standardized access to digital vehicle and infrastructure assets.

We urge Congress to support fair, equal and standardized access to digital vehicle and infrastructure assets, including real-time access to data and hardware resources to advance innovation of connected and autonomous technologies in the U.S. The future of mobility is changing rapidly with major innovations in advanced driver-assistance systems (ADAS), autonomous driving, vehicle electrification and vehicle-to-vehicle and vehicle-to-infrastructure connectivity. Information generated by the tire and paired with vehicle data can be leveraged to link information about the road and the vehicle to provide key information to the driver around fuel efficiency, tire maintenance and monitoring road and weather conditions.

We support federal funding to develop domestic sources of sustainable natural rubber.

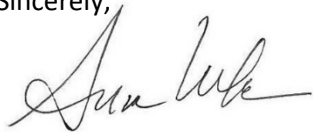
Since natural rubber is critical to the tire industry, national security and the U.S. economy, USTMA strongly supports efforts to promote the development of a domestic supply of natural rubber, including guayule and TKS (dandelion), which have led to successful experimental tires. Natural rubber is used in all tires and provides needed performance and durability qualities that can only be achieved through its use. For example, commercial and military aircraft tire treads and heavy-duty truck and bus tread are made almost completely from natural rubber because of unique properties that synthetic rubber does not offer. With 90% of natural rubber supply coming from southeast Asia, any supply chain interruptions may have serious repercussions for the U.S. tire market, potentially restricting production of truck, bus, military vehicle and aircraft tires.

We urge Congress to support the development of a domestic natural rubber industry to include:

- 1) Economic support for farmers to incentivize needed investments to help them adapt to planting rubber-producing crops as part of the normal agricultural economy;
- 2) Economic support to scale commercial processing facilities to extract the rubber and other high-value co-products from guayule and TKS; and
- 3) Funding for research to further develop domestic sources of natural rubber.

U.S. tire manufacturers are a critical part of the American economy, with a commitment to sustainable practices in every aspect of their businesses. As global leaders in manufacturing, our companies embrace a shared responsibility of helping to achieve a more sustainable society. We look forward to continuing our work with Congress and your offices. For more information, please contact Nicholas Scoufaras, USTMA's Deputy Director of Government Affairs, at (202) 682-4853 or nscoufaras@ustires.org.

Sincerely,



Anne Forristall Luke

President and CEO

U.S. Tire Manufacturers Association

cc: The Honorable Donald J. Trump, President of the United States
The Honorable Sean Duffy, Secretary, U.S. Department of Transportation
The Honorable Lee Zeldin, Administrator, U.S. Environmental Protection Agency
Members, U.S. Senate
Members, U.S. House of Representatives

* Bridgestone Americas, Inc., Continental Tire the Americas, LLC, GITI Tire (USA), The Goodyear Tire & Rubber Company, Hankook Tire America Corp., Kumho Tire U.S.A., Inc., Nokian Tyres Inc., Pirelli Tire North America, Inc., Toyo Tire Holdings of Americas Inc., and Yokohama Tire Corporation support federal implementation of a consumer information program with performance standards for tires. Michelin North America dissents from the USTMA position on that issue, and supports all other industry priorities stated in the USTMA letter.