

June 21, 2019

Krista Friesen
Ministry of the Environment, Conservation & Parks
Resource Recovery Policy Branch
40 St. Clair Avenue West, 8th floor
Toronto ON M4V 1M2

Dear Ms. Friesen:

RE: **Proposed Regulations for Electrical and Electronic Equipment and Batteries under the *Resource Recovery and Circular Economy Act, 2016* – ERO 019-0048**

The Corporation of the City of Guelph (the City) submits the following comments in response to the proposed regulations for recycling of electrical and electronic equipment (EEE) and batteries. The City appreciates the opportunity to provide comments on these regulations and recognizes their significance under the *Resource Recovery and Circular Economy Act, 2016* (RRCEA).

The City endorses all comments collectively submitted to the Ministry by the Municipal Resource Recovery and Research Collaborative (M3RC), which includes the Association of Municipalities of Ontario (AMO), the City of Toronto, the Regional Public Works Commissioners of Ontario (RPWCO) and the Municipal Waste Association (MWA).

The City delivers an annual curbside battery collection program and operates an EEE and battery collection site at its Waste Resource Innovation Centre.

General Comments

- The EEE regulations only stipulate a management requirement (i.e. efficiency standard) for two of the four EEE material categories (i.e. information technology, telecommunications & audio visual equipment). **The City strongly urges the Ministry to include a management requirement for the two remaining categories (i.e. large and small EEE equipment). The Ministry should hold all EEE material categories to the same collection and management standards.**
- The EEE regulations require producers to establish a minimum number of collection sites based on population size. Each collection site must accept all EEE material categories. **The City strongly urges the Ministry to create geographic targets for each of the four material categories. As an example - Producers should**

not only focus on larger municipalities, such as Toronto, to meet their collection and management requirements. The Ministry should not marginalize smaller municipalities from resource recovery opportunities.

- The proposed EEE regulation incentivizes producers to make consumer repair possible, by providing customers with repair information (at no cost), in addition to tools and parts (at no charge or on a cost recovery basis). **The Ministry should include a condition to reduce the complexity of the repair process and ensure that the customer can easily access the tools and parts (with limited inconvenience). The Ministry should also specify what they mean by 'cost recovery basis'.**
- The proposed EEE regulation incentivizes producers to make consumer repair possible and to offer extended warranties by reducing the recovery target in relation to their adoption of these initiatives. **These incentives only apply to EEE that falls into the category of information technology, telecommunications and audio-visual equipment. The Ministry should consider extending these incentives to the remaining three designated material categories (i.e. large equipment, lighting and small equipment). There should also be a mechanism that accurately accounts for 'items' that are repaired and remain in use vs. those added to the recovery target. The Ministry should be going beyond incentives and looking at circular economy procurement models such as products as a service.**
- The proposed EEE regulation incentivizes producers to use recycled glass and plastic in their manufacturing. **The Ministry should consider extending the incentive to all materials used in the product.**
- The proposed regulations for EEE and batteries state that every producer shall implement a promotion and education program. **The Ministry should consider requiring that all producers work together to advertise and brand their programs in a consistent manner. This should be the standard for all current and future RRCEA waste programs. For example, there should be one central webpage for all waste programs as a 'one-stop-shop' for customers.**
- **The regulations should include a clause pertaining to the reporting process for non-compliance issues. The process should be simple, accessible and advertised. As an example - How and where do municipalities and/or residents report issues of illegal dumping?**
- **The Ministry should consider providing more clarity around the EEE designated material categories. As an example - Are hair dryers, curling irons and flat irons considered electronic waste? A simpler definition may be all products with a cord or battery.**

Thank you for the opportunity to provide feedback on these draft regulations. We look forward to continued municipal involvement in waste management in Ontario.

Sincerely,

Leah Pedman for:

Scott Stewart
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City of Guelph

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