



County of Simcoe
Solid Waste Management
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June 21, 2019

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

Dear Ms. Friesen,

Thank you for the opportunity to comment on the Proposed Regulations for Recycling of Electrical and Electronic Equipment (EEE) and Batteries under the Resource Recovery and Circular Economy Act, 2016 (ERO 019-0048). Please accept the following comments on behalf of the County of Simcoe, please note the following comments have not yet received Council endorsement. Information, including this response, will be provided to our Council.

County of Simcoe Solid Waste Management staff agrees with and re-iterates the many of the comments brought forth by the collective submission provided by 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"). Rather than repeat their individual comments, please consider them as our own. We have provided additional feedback to our specific concerns, where appropriate

The County of Simcoe currently collects Electronic and Electrical Equipment (EEE) at eight waste management facilities and batteries at five of these locations which collectively service the County's 325,000 residents. The programs are quite successful, with the County collecting 572 tonnes of electronics and 47 tonnes of batteries at our facilities in 2018. Additionally, the County provides curbside collection of both batteries and electronics, and these collection programs captured 77 tonnes of electronics and 25 tonnes of batteries in 2018.

The County of Simcoe supports the wind-up plan and the comprehensive list of acceptable items as we are currently diverting both program and non-program electronics and all types of batteries. The list of electronics is extensive however, we recommend that toys be included in the program as they often contain batteries and/or electrical components. We are also supportive of the inclusion of lighting in the new program.

The County is currently separating material into designated EEE categories however continuing to do so may be difficult as this requires both staff time and, should tonnages continue to increase, would require significantly more space in order to sort. The County feels that municipalities should be exempt from section 35 with respect to reporting as we collect all categories of EEE and weighing the information technology, telecommunications and audio visual equipment category and the lighting category separately would be difficult and require significant staff time which we would not be financially compensated for. The County sends material in the current program to a processor in one load, separated into categories by skid, and then the processor reports back to the County on the quantities of each category that we collected. Should municipalities be required to report as per section 35 the County recommends that the method of reporting the number and weight of each category remain the same as

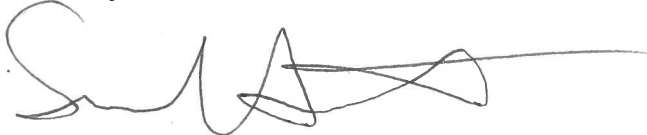
the current process. Within the current program for EEE the County is supplied with the packaging and shipping materials needed to ship the items and we are supportive of this continuing.

The County is currently financially compensated for collecting EEE and single use batteries; however, in the new program there is no requirement for producers to provide financial compensation to collectors. This is of significant concern to the County of Simcoe as the cost to operate multiple collection sites (i.e. staff time and space requirements) would be borne entirely by the taxpayers should the producers not provide an incentive. Without an incentive, the County may have to reconsider continuing our current collection programs, which would be confusing for residents used to bringing all waste materials to our sites for disposal. Without convenient and free access to diversion programs it is our experience that divertible materials often end up in landfill. The County recommends the insertion of a subsection addressing the ability for the producer to use third party collectors (such as the County) and regulate how that third party would be financially compensated for being a collection site.

With respect to limits of quantities per person per day (15 kg of batteries and 150 kg for EEE), the County feels that municipalities should be exempt from these sections as is the case with the current Used Tire regulation. Weights for these individual items will be difficult to quantify at the collection site, and in our experience weighing this specific material is impractical as residents are generally disposing of small quantities of multiple material types at one time. Weighing the EEE or batteries separately would be an unreasonable expectation at the time of collection. Should this section remain within the regulation without exemptions to municipalities the County would request the Ministry to reconsider the 15 kg weight limit for batteries as one large battery may exceed 15 kg. Additional paperwork for weight exceedances would require more staff time and additional delays. Furthermore, the County notes that all of our collection sites are regulated by Environmental Compliance Approvals administered through the Ministry of the Environment, Conservation and Parks which define the quantities of waste we are permitted to collect.

The County is in support of the new Electrical and Electronic Equipment regulation and the Batteries regulation and supports the comprehensive list of items accepted within these regulations with the recommendation to add toys to the program. Ensuring producers are responsible for the end of life of their products makes them more environmentally conscious and these regulations will result in a significant improvement to the current program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan Hunter', with a long horizontal flourish extending to the right.

Susan Hunter
Acting Director of Solid Waste Management