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Terrapure Environmental Response to Proposed Regulations for Recycling of EEE and Batteries under the RRCEA 2016

Ministry of the Environment, Conservation and Parks ERO Number: 019-0048

Introduction

Terrapure Environmental* is pleased to respond to the **Proposed Regulations for Recycling of EEE and Batteries under the RRCEA 2016,** as we share the common goal with the Ontario Government of strengthening Ontario's economy while protecting the environment. To achieve this goal, businesses need confidence and certainty for Ontario to become more competitive.

While we agree with many elements of the proposed regulations, there are key elements for which we have questions for the MECP, which, if answered, would help provide clarity to industry.

* NOTE: A division of Terrapure Environmental – Terrapure's lead-acid battery recycling business based in Mississauga, ON called Tonolli Canada Ltd. – has also submitted a separate response to the proposed regulations on issues related to the need to not include lead-acid batteries in the proposed regulations.

Terrapure and its Role

Terrapure Environmental is a leading Canadian provider of professional, cost-effective environmental and industrial services and recycling solutions that help address industry's environmental challenges. With an unwavering focus on environmental, health and safety excellence, the company provides services that minimize waste and maximize the recovery or recycling of valuable industrial by-products through a coast-tocoast network of facilities and on customer sites. In Ontario, Terrapure provides single-use and rechargeable battery sorting and consolidation services as an exclusive supplier to Call2Recyle's battery recycling program at a facility in Hamilton (Imperial Street).

Section	Questions
Batteries	
Section 4	 Does the Regulation represent all generators of waste batteries (including, residential and IC&I), or only residents (the Regulation mentions "consumers", which could be construed as residents only)? a. Are large quantity generators (generally, over 100 kg of waste per month) included in this Regulation/Program? b. Are small quantity IC&I generators included in this Regulation and able to participate in the Program? c. If large quantity generators are excluded, is the expectation that battery Haulers and Processors will separately track batteries from residential (<i>i.e.</i>, Program) compared to other sources (<i>i.e.</i>, regular business)?
Section 1	 Reference is made in the Regulation to a "Batteries Processing and Refurbishing Guideline": Have there been (or, will there be) consultations (<i>i.e.</i>, involving waste management organizations) to help prepare this <i>Guideline</i>? How can the industry provide input? How will the <i>Guideline</i> be structured (<i>i.e.</i>, what will it look like)? What information will be included in the <i>Guideline</i>? When will the <i>Guideline</i> be available for review? Will the <i>Guideline</i> dictate all requirements and expectations to be an approved batteries <i>Hauler</i> and <i>Processor</i> (<i>i.e.</i>, standards)? What are the main requirements (<i>i.e.</i>, ECAs, CVOR, regulatory, staff training, etc.) to be an approved battery <i>Hauler</i> and/or <i>Processor</i>? Will an audit be conducted on prospective battery <i>Transporters</i> and <i>Processors</i> (<i>i.e.</i>, how do you intend to 'weed-out' ineffective/unprepared organizations)?
Section 14, 20, 26, & 28	 Is the referenced Average RER based on a calendar year (<i>i.e.</i>, 80% of battery waste must be recycled by December 31)? a. How will <i>Program RERs</i> be enforced? b. Will there be clear dictated penalties for <i>Processors</i> that do not meet the <i>RERs</i>?
Section 25 Part VI	 Will there be penalties enforced on <i>Haulers</i>, if so what types? What do the annual fees look like for registering as a <i>Hauler</i> and <i>Processor</i>?

Questions Related to Proposed Regulations

Summary

Terrapure appreciates the opportunity to offer comment on the Ministry of Environment, Conservation and Parks' proposed regulations regarding EEE and Batteries. We would welcome the opportunity to meet with the MECP to discuss these questions and comments further.

Please contact:

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