



Compressed Gas Association  
The Standard For Safety Since 1913

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*Submitted online*

March 24, 2021

Allison Deng

Resource Recovery Policy Branch

40 St. Clair Avenue West, 8<sup>th</sup> floor

Toronto, ON

M4V 1M2 Canada

Re: Proposed Producer Responsibility Regulation for Hazardous and Special Products (HSP);  
ERO Number: 019-2836

Dear Ms. Deng:

The Compressed Gas Association (CGA), founded in 1913, is dedicated to the development and promotion of safety standards and safe practices in the industrial, medical, and food gases industry. CGA represents over 130 member companies in all facets of the industry – manufacturers, distributors, suppliers, and transporters of gases, cryogenic liquids, and related products and services. Through a committee system, CGA develops technical specifications, safety standards, and training and educational materials, and works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations and standards.

CGA requests that refillable pressurized containers be exempted from the proposed Producer Responsibility Regulation for Hazardous and Special Products (HSP) Regulation in line with the exemption of pressurized containers that are used or intended to be used for the storage of propane.

Refillable pressurized containers are high value, long life assets. They are manufactured and transported in accordance with Transport Canada (TC) regulations. These containers are intended to be refilled thousands of times during their life, with containers today in service dating back 60 years or more. Because refillable pressurized containers are a substantial investment, CGA member companies have extensive life management programs to track them. These containers are typically not sold to the end user who only purchase the product contained in them. The containers are leased or rented to the customer, which provides a financial incentive for the containers to be returned rather than disposed of. Further, the vast majority of refillable containers are delivered to end users, with empty containers being picked up as part of that process for return and reuse, providing further incentive not to dispose of them. The attached graphic depicts a typical cylinder life cycle.

Although refillable pressurized containers have a long life, ultimately, they have to be removed from service. At such time, the containers are emptied of any residual product, rendered safe for disposal, and the container materials are either recycled, as is the usual case for metal containers, or are properly disposed of in accordance with environmental regulations.

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While a small percentage of refillable pressurized containers in use may be owned directly by end users, they are often refilled by CGA members because of the specialized equipment needed. For many years, if a cylinder is unserviceable, CGA members have accepted it for final disposition.

Because these refillable pressurized containers are closely managed and have value, even when empty and at the end of their life, they are not expected to end up in the general waste stream and pose no significant burden.

We ask that consideration be given to the exemption of refillable pressurized containers from this proposed regulation in line with the exemption of pressurized containers that are used or intended to be used for the storage of propane. Thank you for your kind consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard A. Craig".

Richard A. Craig  
Vice President, Technical & Regulatory Affairs  
Telephone: (703) 788-2730  
Email: [rcraig@cganet.com](mailto:rcraig@cganet.com)

Attachment – Cylinder Life Cycle

# Cylinder Life Cycle

What are the different steps in the life of a cylinder?

