



Hamilton

City of Hamilton
Public Works Department – Waste Management Division
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Submitted to ERO# 019-4656

John Fox
Resource Recovery Policy Branch
Ministry of the Environment, Conservation and Parks (MECP)
40 St. Clair Avenue West, 8th floor
Toronto, ON M4V 1M2

Re: ERO# 019-4656: Proposed amendments to the producer responsibility regulations for tires, batteries and electrical and electronic equipment made under the Resource Recovery and Circular Economy Act, 2016

Thank you for the opportunity to provide feedback on the proposed amendments to the producer responsibility regulations for Tires (O. Reg. 225/18), Batteries (O. Reg. 30/20), and Electrical and Electronic Equipment (O. Reg. 522/20) under the Resource Recovery and Circular Economy Act, 2016.

As a member of the Regional Public Works Commissioners of Ontario (RPWCO), the City of Hamilton is providing comments on the proposed regulatory amendments included in ERO# 019-4656.

The following comments represent sections of the proposed amendments that the City of Hamilton has concerns with, would like the MECP to consider, or would like additional information on:

1. The Tires Regulation proposes to remove the audit requirements for supply data reporting and replace it with an internal verification process. It is also being proposed to reduce the frequency of management audits from annually to once every three years. These proposed amendments are a concern since regular audits are a necessary tool for oversight of the Tire Regulation and that required performance measure are being achieved through the Regulation.
2. A proposed amendment to the Tires Regulation is considering the removal of ongoing general promotion and education and allowing producers to determine what promotion and education is necessary to meet their collection and management targets. This proposed change should be removed since ongoing promotion and education is necessary to raise awareness and reinforce positive consumer behaviors on the proper disposal requirements for tires.

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The following comments are in support of the proposed amendments:

1. The proposed amendment to the Tires Regulation to expand the requirement for producers to provide on-demand collection services to additional sources including municipalities with populations of less than 1,000, territorial districts and First Nation communities.
2. The proposed amendment to the Electrical and Electronic Regulation to expand the requirement for producers to provide on-demand collection services to additional sources that have collected at least four tonnes of information technology, telecommunications and audio visual (ITTAV) equipment.

The City of Hamilton respectfully requests the MECP's consideration of the above comments. The City of Hamilton remains committed to working with MECP on the requirements for the transition of the tires, batteries and electrical and electronic equipment programs under the Resource Recovery and Circular Economy Act, 2016.