

# PPSR*Review*

**MANAGING WASTE RESPONSIBLY**

**Product & Packaging  
Stewardship Review**

**An information service for municipal governments**

**Vol 8, Issue 1, January 2008**

## Ontario's preliminary WEEE plan posted for comment

Comments on Ontario's 233-page Draft Preliminary Waste Electrical and Electronic Equipment (WEEE) Program Plan, now posted on Ontario Electronic Stewardship's (OES) website, are due by February 4, 2008.

As required by the Minister of the Environment, Phase One of the WEEE stewardship program will see

computers, monitors and TVs, and computer printing and peripheral devices collected for processing. Costs are to be paid by brand owners, first importers and assemblers of non-branded WEEE.

The plan as proposed would see the number of WEEE collection sites across the province increased. The collection sites would be operated by many

organizations, including municipalities, non-profit groups, retailers, waste management companies and others. OES proposes paying the organizations \$165 per tonne for this collection service. Collected materials will then be transported to processors for recycling. A promotion and education plan will be developed to raise public awareness of the program.

The methodology for setting the stewards fees is outlined in the draft plan. The cost of collecting, consolidating, transporting and processing Phase One WEEE in year one is estimated at \$48,758,000.

### CONSULTATION WORKSHOP

The third consultation workshop and webcast on the development of Ontario's WEEE Plan was held January 24, 2008.

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## WEEE reusers concerned they'll be squeezed out

Smaller WEEE processors are afraid the stewardship plan proposed by OES will have a negative impact on their business.

In a letter to Environment Minister John Gerretsen, December 20, Computer Recyclers Inc., ADL Process Inc., Trillium e-scrap Recyclers, Toronto Recycling Inc. and Computation Ltd. express concerns about the "fundamental economic design of the program" OES plan.

Central to their concern is that OES will be "the sole purchaser" of electronic recovery, reuse/refurbishing and recycling services in Ontario.

The processors argue that the plan gives OES a buying monopoly, one that will allow "large multinational original electronic equipment manufacturers (OEMs) and big box retailers who themselves may be electronic equipment brand owners—to effectively control the WEEE

processing industry and potentially sideline (and thus eliminate) many existing and fully qualified WEEE processing businesses."

The letter goes on to question why OES sees it necessary to contract for any WEEE collection or processing services. It is "unnecessary" for the purposes of meeting the environmental objectives set forth by the 2002 Waste Diversion Act, the processors state.

The processors propose a revised plan that would see monetary incentives from OES paid to WEEE collectors, with the rest of the financial exchanges between collectors, processors and resulting end markets unfolding as they do currently.

The letter also suggests that the province consider a ban on landfilling WEEE.

The letter is posted on the PPSR website ([www.productstewardship.org](http://www.productstewardship.org)).

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## Briefly...

### **BREAD, MILK & A COUPLE OF CARBON OFFSETS...**

Japanese shoppers can now buy carbon offsets at their local grocery store to help meet Japan's targets under the Kyoto Protocol. In September 2007, Seiyu Ltd., a major supermarket chain, announced that part of the profits from two of its shopping bags will be given free-of-charge to the national government to use for UN carbon credits. Carbon Offset Japan, a non-profit organization, will facilitate the transactions. Shoppers can choose from a 20 yen (US\$0.18) polyethylene bag that is replaced free-of-charge when it wears out or a longer lasting canvas shopping bag. The supermarket chain claims it is offering the program to promote a better understanding of carbon-offsets as a way individuals can contribute to mitigating global warming.

*Japan for Sustainability, December 12, 2007*  
[www.japanfs.org/db/1923-e](http://www.japanfs.org/db/1923-e)

### **IRELAND INTRODUCES BATTERY TAKE-BACK**

On January 2, Ireland's Minister for the Environment, Heritage and Local Government published draft waste battery regulations. The regulations meet the requirements of the EU's Directive on Waste Batteries, which aims to reduce the environmental effects of all types of batteries. The directive calls for a reduction in mercury, lead and cadmium levels in batteries sold after September 26, 2008. It also requires producers to be financially responsible for collecting, treating, recovering and safely disposing of waste batteries after that date. Consumers will be able to take back their waste batteries to the point of purchase or to other collection points. The Irish waste battery regulations were developed in consultation with industry, municipal governments and other stakeholders. This group is also developing proposals for a Producer Responsibility Initiative for waste batteries.

*Government of Ireland, January 3, 2008*  
[www.environ.ie](http://www.environ.ie)

### **NATIONAL BOTTLE BILL INTRODUCED IN US**

On November 15, 2007, Representative Edward Markey introduced a bill to the US House of Representatives calling for a 50-cent deposit on all sealed beverage containers constructed of metal, glass, plastic, or combination of these materials, under a gallon in size. The 11 US states that currently have deposit-return systems in place have recycling rates twice as high as those that do not. It is argued that the deposit proposed under the Bottle Recycling Climate

Protection Act would encourage recycling and reduce the energy used in manufacturing new bottles and cans. In 2006, more than half of the 200 billion cans and bottles that could have been recycled in the US were incinerated or littered. This has a considerable effect on carbon emissions—if the 58 billion aluminium cans thrown away in the US each year were recycled, it would reduce emissions an amount equivalent to the pollution from 1 million cars.

*Container Recycling Institute, November 15, 2007*  
[www.bottlebill.org](http://www.bottlebill.org)

### **WATER BOTTLE TAX TAKEN TO COURT**

Five-days after going into effect on January 1, 2008, industry groups sued the City of Chicago over its 5-cent per bottle tax on bottled water. The suit, brought by the International Bottled Water Association and others, claims the tax is illegal as a state law prohibits municipalities from taxing food that will be consumed off premises. The suit also states that bottled water should be treated like other non-carbonated drinks, which are not subject to the 5-cent tax. Chicago city staff argue the tax is legal, as the state law prohibits percentage-based taxes on foods, not per-unit taxes like the bottle tax. And they feel bottled water should be treated like carbonated drinks, as unlike bottled teas and sports drinks, Chicagoans have access to safe water through their taps. Other opponents argue that the tax will hurt local grocers as city residents will drive to the suburbs to get bottle water untaxed. Chicago is the first major US city to introduce a tax on bottled water and the city hopes it will cut down on plastic waste. It is anticipated that the bottle tax will bring US\$10.5 million annually to the city coffers.

*Chicago Sun-Times, January 5, 2008*  
[www.suntimes.com](http://www.suntimes.com)

### **NORWAY BANS MERCURY IN PRODUCTS**

Recognizing the human health dangers posed by mercury released into the environment, the Norwegian government banned mercury in products starting January 1, 2008. Banned are the production, importation, or exportation, sale or use of substances that contain mercury or mercury compounds, including dental fillings and thermometers. Mercury used in welding must be phased out by the end of 2010. Batteries and electronics are regulated differently.

*Resource Recovery Forum, January 10, 2008*  
[www.resourcnotwaste.org](http://www.resourcnotwaste.org)

**Product & Packaging Stewardship Review** is published by Ben Bennett Communications as part of the Fair Comment Project. It is emailed as a communications service aimed at providing a broad range of stewardship and associated information from Canada, the United States and overseas.

The current and past issues of PPSReview are available for viewing on the Internet ([www.productstewardship.org](http://www.productstewardship.org)).

Anyone wishing to support the Fair Comment Project may email Ben Bennett ([bbc@albedo.net](mailto:bbc@albedo.net)). Confidentiality is guaranteed.

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# Municipalities to see \$4.5 million in 2007 LCBO “Transitional Funding”

On January 8, 2008, Waste Diversion Ontario (WDO) announced \$4,485,710 in glass recycling support to Ontario municipalities.

The funds come from the Liquor Control Board of Ontario (LCBO) to compensate municipalities for the 127,736 tonnes of clear and coloured glass they marketed, based on 2005 municipal data call figures. The total glass marketed numbers include those that went for “other eligible uses.”

In September, WDO released 2006 flint, coloured and mixed glass figures; 139,654 tonnes of glass were marketed under municipal blue box programs.

Toronto, having marketed 27,501 tonnes of glass in 2005, will receive \$965,750, the largest portion of the funds. The top five glass marketers in the province (based on total tonnes marketed) were the cities of Toronto and Ottawa, and the Regions of Peel, York and Durham. Together these municipalities will receive just over half of the total funds for having marketed a total of 64,606 tonnes.

WDO’s website states that these funds are “to municipalities in support of municipal transition under the wine and spirits deposit system.” As reported the November 2007 edition of PPSR, Ontario municipalities will have to wait

to find out what financial adjustments will be made to the 2008 payments as a result of wine and spirit containers being removed from the blue box under the new LCBO deposit-return system.

For more information on the LCBO funding see the news section of WDO’s website ([www.wdo.ca](http://www.wdo.ca)).

## CCME report seeks input

The Canadian Council of Ministers of the Environment (CCME) is looking for feedback on a proposed approach to developing sustainable packaging guidelines and encourages all interested organizations and individuals to review the consultation document.

*The Inventory of Sustainable Packaging Initiatives and Proposed Approach to Develop Sustainable Packaging Guidelines*, prepared by Five Winds International for the CCME EPR Task Group, reviewed a number of approaches, including the “scorecards” being adopted by various retailers, including Wal-Mart (not recommended), SC Johnson and BASF (which both contain some elements the authors felt worthy of consideration).

The report is available by visiting the CCME website ([www.ccme.ca](http://www.ccme.ca)) and clicking on the *What’s New* link.

The consultation period ends March 3, 2008.

*(There’ll be more on the report in the next issue of PPSReview—editor)*

## WEEE Program Plan for Ontario

*(CONTINUED FROM PAGE 1/8)*

Hosted by OES, the key components of the Draft Preliminary WEEE Diversion Program Plan were presented to a full house of attendees at the Novotel Hotel in Toronto.

### PROGRAM PLAN TO MINISTER IN MARCH

It is expected that the Draft Final WEEE Program Plan will be posted for review and comment on March 10, with comments due by March 14. According to the current schedule, it is anticipated that the Final WEEE Program Plan will be submitted to the Minister of the Environment by Waste Diversion Ontario on March 31, 2008.

For more information and to link to the webcast archive visit the OES website

### KEY ELEMENTS OF THE PROPOSED WEEE PLAN

*Taken from the Draft Preliminary WEEE Program Plan, Jan. 14, 2008*

- OES will contract with a province-wide network of approved collection sites....
- Contracted collection agents, including for-profit and non-profit organizations, IC&I service providers and municipalities, will receive a weight-based financial incentive for all Phase I WEEE collected, sorted and prepared for transport to end-of-life processors.
- Existing reuse and refurbishment activities will be encouraged to act as OES collection sites and to expand their reuse operations...
- Transportation services between collection sites, consolidation points, and primary processors, will be contracted by OES through a competitive bidding process.
- Primary processors of WEEE will be selected and contracted through a competitive bidding process with vendors required to meet the Recycling Standard set by OES. Downstream processors will also have to meet the Recycling Standard.
- A province-wide promotion and education (P&E) program will be implemented...
- The cost of the program will be shared equitably among WEEE stewards.

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## REDUCING PACKAGING

# To catch a rabbit, think like a rabbit

by Helen Spiegelman

The power of extended producer responsibility (EPR) is its potential to harness the forces within the marketplace to drive improvement in the environmental performance of products.

To be successful in this objective, EPR programs must be rooted in a clear understanding of the product marketing process. They must foster fair competition and not inadvertently disadvantage certain competitors for reasons that have nothing to do with environmental protection. They must also foster accountability, so that governments can track the producers' performance and require modifications to improve performance.

British Columbia's product-by-product approach to EPR comes as close as any in North America to meeting these criteria, and it contains critically important lessons as it applies to packaging.

In BC, all producers (brand-owners/first importers) within a designated product category are subject to the same rules. Producers have full control over the design and operation of their programs subject to approval by government on the basis of clear criteria. Brand-owners bear the full costs of environmental management with no public subsidy and they are obliged to report regularly on their programs' performance.

### COLLABORATION

BC's programs are all rolling out relatively smoothly. They have fostered collaboration and information-sharing towards environmental improvement within the product sectors that are involved (electronics, beverage, paint, used oil, tires, etc.). The producers, government and public can all pinpoint with precision where programs need adjustments.

Most important, EPR programs are relieving local governments in British Columbia of costs and risks incurred

through municipally-operated diversion programs for products and packaging waste.

A product-by-product approach will bring similar good results for packaging, but only if rooted in a clear understanding of where packaging fits in the product marketing process. To catch a rabbit, think like a rabbit.

Intuitively, we think of "packaging" as a product category, with sub-categories defined by material type (e.g., glass, plastic, composite, etc.). This is the waste manager's "end of pipe" perspective, based on seeking end-users for collected materials.

**"It makes sense for EPR to be structured around product segmentation system that reflects the industry's own segmentation."**

But from the marketing perspective (the beginning of the pipe) packaging is not a "product" in itself but an indivisible part of the product it contains. Brand-owners carefully specify their packaging as an important component in their "marketing mix" (along with price, promotion, positioning, etc.).

### APPLICATIONS

What does this tell us about EPR for packaging? From the industry perspective, product packaging falls into natural categories (called "applications") that reflect the characteristics and needs of different kinds of products. Within each application, several different packaging suppliers may compete to provide packaging solutions for different marketing purposes.

A good example is the beverage packaging application, which utilizes aluminum cans, PET bottles, glass bottles, aseptic boxes, etc., as specified by the brand-owner. Canada's most successful and long-standing "stewardship" program for packaging regulates packaging by application. BC's Recycling Regulation requires all brand-owners (except milk) within the

beverage application to provide stewardship of their packaging regardless of the material it is made with. More recently, two additional packaging applications have been regulated under the BC Recycling Regulation (paint and used oil).

### HOUSEKEEPING

Last year the Recycling Council of BC (RCBC) called for housekeeping changes to the Recycling Regulation so that all product categories would include "associated packaging." RCBC also recommended to BC Environment Minister Barry Penner that a new packaging application—soaps, cleaners and detergents—be brought under the regulation. The recommendation was supported by the Metro Vancouver (formerly GVRD) Board.

This application includes bulky plastic jugs and bottles, boxboard boxes and plastic sacks.

The domination of this application by a small number of well-known brand-owners will facilitate compliance and performance tracking.

It makes sense for EPR to be structured around product segmentation system that reflects the industry's own segmentation. As EPR is expanded, product by product and application by application, municipal waste management will no longer need to deal with packaging of any type.

*Helen Spiegelman is coordinating a new independent citizen's initiative called Zero Waste Vancouver. See [www.zerowastevancouver.blogspot.com](http://www.zerowastevancouver.blogspot.com).*

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IN ALBERTA

# New waste strategy calls for three new stewardship programs

Paint recycling will be the first stewardship program launched under Alberta Environment's *Too Good to Waste: Making Conservation a Priority* long-term waste strategy.

In releasing the strategy on October 18, 2007, Minister of Environment Rob Renner stated, "We have to rethink our idea of waste – rather than being something to put in a landfill, it is often something that can be transformed into a valuable resource."

Stewardship programs feature heavily in the strategy, with industry-funded programs for paint and other household hazardous wastes, packaging and printed materials, and construction and demolition wastes listed.

Starting April 1, 2008, Alberta's new paint stewardship program will see an environmental fee on every can of paint (up to 23 litres in size) sold in the province. The fees will range from \$0.10 for aerosols to \$1.00 for the largest containers.

The collected fees will be used by industry to run the program, recycle or reuse collected paint, and promote the initiative. The Alberta Recycling Management Authority, which manages the tire and electronics recycling program, will administer the paint stewardship program.

Paint will be collected at 130 pre-existing municipal HHW depots and events across the province.

For more information visit [www.albertarecycling.ca](http://www.albertarecycling.ca).

## Peel calls on water bottler to remove recyclability claims

The Region of Peel has called on Fernbrook Springs Bottled Water Company to remove claims that its 15-litre non-refillable water bottles are recyclable.

In a letter to Fernbrook president R. Elliot in December, Andrew Pollock, Peel's Director of Waste Management, asks that the company immediately remove recyclability claims from the paper neck rings and labels on the bottles.

Mr. Pollock argues that Fernbrook's labelling misleads consumers into believing that they can recycle the bottles in their blue box.

The bottles, flattened or not, are not recyclable in any Greater Toronto Area blue box program due to their size, he notes.

A March 2006 resolution by Peel Regional Council called on the Ontario Minister of the Environment to have manufacturers of 15-litre PET bottles either operate a deposit-return system or pay 100% of the costs of adding the bottles to the blue box stream. These issues have not been acted upon to date.

## MHSW Plan to start July 1, if approved

Waste Diversion Ontario resubmitted the Municipal Hazardous or Special Waste (MHSW) Program Plan to the Ministry of the Environment this past December.

With the Ministry's delay in approving the original MHSW plan, submitted on May 23, 2007, Stewardship Ontario needed to change the start date of the plan from January 1 to July 1, 2008. The plan then had to be updated to reflect a change in the Year 1 stewards' fees, to allow them to remain in effect until December 31, 2009. This change will allow the year-end for the MHSW program to coincide with that used for the Blue Box Program Plan. In addition, minor changes were made to the wording around how stewards' fees would be determined.

There is no word yet as to when the Minister might approve the MHSW plan. The revised plan is available at [www.stewardshipontario.ca](http://www.stewardshipontario.ca).

## PS recycling plant closes

The Canadian Polystyrene Recycling Association (CPRA) plant in Mississauga has suspended its recycling operations.

In a letter to its customers, December 17, CPRA Chair Roman Talkowski said the operation has become "financially unsustainable."

Despite a growing market for recycled polystyrene and anticipated new volumes—Toronto is planning to accept polystyrene in its blue box program some time in 2008—CPRA's high fixed costs and the high Canadian dollar have made the association's business model "unsustainable" at this time. The currency fluctuations led to a 30% decline in revenues.

CPRA is working with others in the industry to try to put in place a more viable polystyrene recycling operation.

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# China bans plastic bags; Ontario continues with voluntary measures

Following the January 8, 2008, announcement by the Chinese government to ban the use of some plastic bags, Ontario Premier Dalton McGuinty restated his government's commitment to working with industry to reduce the use of plastic bags without resorting to a ban at this time.

In May of last year, the Province announced a voluntary agreement with grocery stores to cut the use of plastic bags by 50% in five years.

Cathy Cirko, of the Environment and Plastics Industry Council (EPIC), was quoted in the *Toronto Star* (08/01/08) as saying, "Canada is different from China. We have an infrastructure for recycling here. Shopping bags are recycled and highly recyclable. What China should be doing is building an infrastructure on recycling."

## **CHINA BANS ULTRA-THIN BAGS AND FREE DISTRIBUTION**

It was the production, sale and use of ultra-thin (less than 0.025 mm thick) plastic bags that were banned by the Chinese State Council. At the same

time, the free distribution of plastic bags was also banned.

Shopkeepers that disobey the bans, which comes into effect June 1, could be fined or have their goods and profits confiscated. In a statement, the State Council is reported as saying, "our country consumes huge amounts of plastic bags every year. While providing convenience to consumers, they have also caused serious pollution, and waste of energy and resources, because of excessive use and inadequate recycling."

The statement goes on to encourage people to return to carrying cloth bags and using baskets for their vegetables.

The State Council urged finance authorities to consider increasing taxes on the production and sale of plastic bags, and garbage collectors to separate plastic bags for recycling.

It is estimated that China uses up to 3 billion plastic bags daily, and needs to refine 37 million barrels of crude oil annually to make plastics for packaging.

## **BAN FOLLOWS OTHERS**

China is following the lead of South

Africa, Bangladesh and Ireland, among others, all of which have put in place bans or taxes on plastic bags. Cities such as San Francisco, London and Paris have all put heavy restrictions on the distribution of free plastic bags.

In January 2008, New York city council passed a law requiring major chains to offer in-store recycling for plastic bags. They must also print in large letters *Please return this bag to a participating store for recycling* on each bag distributed.

In Canada, Leaf Rapids in Manitoba became the first community to ban plastic bags outright. A ban in the Town of Huntingdon, Quebec, came into effect on January 1 of this year. The Province of Quebec is reported to be considering a tax on plastic bags.

## **WDO OKs CIF plan**

In December, the board of director of Waste Diversion Ontario (WDO) approved a three-year Strategic Plan for its Continuous Improvement Fund (CIF) which replaces the E&E Fund.

The strategic plan can be viewed at [www.wdo.ca](http://www.wdo.ca).

## **Replace the WDO?**

*Solid Waste and Recycling* columnist Usman Valiante asks this question in the December/January issue of the magazine.

As of press time, the inside back page article has yet to be posted to the [www.solidwastemag.com](http://www.solidwastemag.com) website.

## **Ontario recyclers ponder perils of PLA/PET confusion**

Early in December, the Canadian Plastics Industry Association (CPIA) held a briefing session on its *Product Stewardship Guide and Commitment for Degradable Plastics*. At the session the technical aspects of the various types of biodegradable plastics—biodegradable, compostable, oxodegradable and photodegradable—were discussed. The following week the City of Toronto hosted a meeting of stakeholders on the biodegradable packaging issue.

Biodegradable plastics are a significant problem for Ontario recyclers. Polylactic acid (PLA) looks the same as polyethylene terephthalate (PET) but is considered a major contaminant in the recycling process. The material can also lead to fogging of high density polyethylene (HDPE). The resulting extra costs to manage PLA may ultimately lead to lower revenues and could even result in the loss of markets in some cases.

Biodegradable bags are a big concern for the plastic film recycling markets, and, like corn-based bottles, are difficult to distinguish from regular plastic bags.

Speakers from Natureworks, which makes PLA packaging, told the Toronto meeting attendees there is infra-red technology that can sort PLA from other plastics. On the lack of markets, Natureworks indicated the company is looking at buying back recovered PLA for \$200 per tonne (\$400 less than loads of HDPE and \$200 less than PET are currently earning).

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# BC e-waste program recycles 1.8 million kg in first three months

In its first three months of operation, British Columbia's electronic waste recycling program diverted more than 1.8 million kilograms electronics from landfill, according to the BC Government.

The province announced in December that approximately 10,000 televisions, 60,000 monitors, 20,000 CPUs and 30,000 printers have been diverted.

The collected e-waste is being processed by certified recyclers to recover the metals and plastics. The BC legislation prevents the collected waste from being shipped to processors in developing country owing to concerns over poor and unsafe labour practices.

Industry is responsible for collecting and recycling the electronics they produce and sell. Two industry groups, the Electronic Stewardship Association of BC and the Western Canada Computer Industry Association, have approved e-waste product stewardship plans operating in the province.

The program continues to expand, with more collection sites opening across BC.

For more information see the BC Ministry of Environment's website ([www.recycling.gov.bc.ca](http://www.recycling.gov.bc.ca)).

## MPSC annual report released

Manitoba Product Stewardship's (MPSC) 2006-07 Annual Report is now available at [www.mpsc.com](http://www.mpsc.com).

Highlighted in the report is the \$7.8 million in payments made by MPSC to municipalities for offering recycling services to their communities. More than 64 million kilograms of household materials were recycled in the province in 2006-07.

## Barretto new CEO of Stewardship Ontario

Joyce Barretto has been appointed the new Chief Executive Officer (CEO) of Stewardship Ontario. Ms Barretto began her new position in mid-December.

Before joining Stewardship Ontario, Ms Barretto served as an Assistant Deputy Minister for the Ontario Ministry of Public Infrastructure Renewal, where she developed policy for lotteries and gaming, alcohol and realty assets.

Ms Barretto takes over the position from Damian Bassett, the CEO of Stewardship Ontario since its inception, who remains as the president and CEO of CSR. (CSR is the secretariat for Stewardship Ontario's blue box program.)

For more information visit Stewardship Ontario's website ([www.stewardshipontario.ca](http://www.stewardshipontario.ca)).

## COMING EVENTS

### February 3–6

Saskatchewan Urban Municipalities Association  
Annual Convention  
Regina, SK  
(306) 525.4387  
[www.suma.org](http://www.suma.org)

### February 24–27

Ontario Good Roads/Rural Ontario Municipal Conference  
Toronto, ON  
(905) 795-2555  
[www.ogra.org](http://www.ogra.org)

### February 27–29

Fifth National Workshop on Extended  
Producer Responsibility  
Co-hosted by New Brunswick's Department of  
Environment and Environment Canada  
Fredericton, NB  
(by invitation)

### March 12–14

Local Government Administration Association of  
Alberta Conference and Tradeshow  
Red Deer, AB  
(780) 398-3994  
[www.lgaa.ab.ca/events.htm](http://www.lgaa.ab.ca/events.htm)

### April 16–19

Northwest Ontario Municipalities Association (NOMA)  
Regional Conference  
Thunder Bay, ON  
(807) 626-0155  
[www.noma.on.ca](http://www.noma.on.ca)

### Apr 30–May 2

Ontario Small Urban Municipalities Conference  
Collingwood, ON  
(519) 393-5877  
[www.amo.on.ca](http://www.amo.on.ca)

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# Opinion Piece

*The opinions expressed in this column are not necessarily those of PPSReview*

WITH APOLOGIES TO JOHN LENNON

## All we are saying...is give EPR a chance

By Jay Arthur

The thinking behind the requirement for a plan for e-waste in Ontario was a bit of a departure for a province not exactly seen as a leader in stewardship issues.

For the first time, stewards were being required to bear the full cost of end-of-life management of their waste.

Could this actually be extended producer responsibility (EPR)? In Ontario? Well, not quite yet.

As with so many other items, the blue box being the prime example, municipalities in Ontario have been picking up the slack on behalf of product manufacturers for years. Some local programs have been collecting local waste electronic and electrical equipment (WEEE) since the 1990s, with the good old municipal taxpayers subsidizing the cost.

Now we seem to be on the brink of something totally new: full EPR.

As with all things, a plan has been developed, outlining how the stewards intend to fulfill their commitments. The plan builds on experience in other provinces and envisions a number of collection scenarios including municipal depots, retail outlets, collection events or “round-ups” and the not-for-profit sector, to name a few.

The organization whose mandate it is to provide the program, Ontario Electronic Stewardship (OES)—or whoever is contracted to provide the service—would then send a truck to collect the stuff and deliver it to consolidation centres and then processing sites.

Sounds pretty straightforward so far.

But there are criteria attached to how OES will want the material handled. It is understandable that it wants to do it right and meet its due diligence mandate, but doing it right costs a lot of money.

Segregating the different WEEE categories, loading it on one-way pallets, wrapping it snugly in shrink wrap and making sure that the items not covered by the first phase of the program don't slip into the mix all costs big bucks.

For this activity, a compensation of \$165 per tonne is being proposed,

**“... is this flat fee really what EPR should look like? Is it anywhere near the true cost of managing collection sites? Who knows?”**

irrespective of the actual costs incurred by the “collection agent”.

Somewhere, the concept of full EPR fell off the table.

Now, many municipalities will look at this per tonne compensation as a gift from the gods—and why not?

It's certainly a lot better than the \$0 per tonne they currently receive, and a truck will come to their door to take the stuff away, to boot.

But is this flat fee really what EPR should look like? Is it anywhere near the true cost of managing collection sites? Who knows?

It is pretty clear that a small program that only collects, say, five or six tonnes annually is going to be a big-time loser under this formula. Payments of \$900 a year wouldn't even cover the administration costs.

And if WEEE from the industrial, commercial and institutional sector is to be included as part of the requirement

(and those guys have a lot of e-waste), then local taxpayers everywhere could end up subsidizing the difference between OES payments and the real cost.

If EPR is to send the signals required to producers, then costs must be realistic. It takes full EPR to drive design-for-the-environment, penalizing producers who continue to flood the market with goods that are obsolete almost as soon as you buy them, or designed in such a way that they can't be affordably repaired one month after the warranty expires. Design that includes durability or adaptability should be rewarded.

So here's a radical idea.

What if municipalities that currently provide a local taxpayer-subsidized WEEE program took a break for a year or two to see how things go with the new OES program.

Perhaps they should step back and give EPR a chance.

Industry associations are always telling municipalities how efficient the private sector is, and here is their opportunity to prove it.

Let's ban the stuff from municipal collection and disposal channels and see what happens when industry is allowed to shine.

Who knows? We might all learn something.

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