



**Electronics Product
Stewardship Canada**

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**Recyclage des produits
électroniques Canada**

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August 9, 2004

Ontario Ministry of the Environment
Waste Management Policy Branch
Ontario's 60% Waste Diversion Goal: A Discussion Paper
135 St. Clair Avenue West, 7th Floor
Toronto, Ontario, M4V 1P5

(sent via fax: 416-325-4437)

Electronics Product Stewardship Canada (EPSC) represents sixteen leading multi-national corporations who have stepped-up to take a leadership role with respect to the environment. Founded by the Information Technology Association of Canada and Electro-Federation Canada, EPSC's current membership includes: Apple, Brother, Canon, Dell, Epson, Hewlett-Packard, Hitachi, IBM, Lexmark, LG Electronics, Panasonic, Sanyo, Sharp, Sony, Thomson Multimedia, and Toshiba. Our mandate is to work with a broad range of stakeholders on behalf of industry to promote harmonized, cost effective and environmentally responsible e-waste stewardship solutions.

We welcome the opportunity to provide Ontario with feedback on the discussion paper related to a potential 60% waste diversion goal. EPSC staff and members have been active participants in a number of the "in-person" sessions, which the Ministry hosted recently on this issue. The following points are a result of our own internal discussions, and the points we have raised in these previous sessions:

- Product stewardship can be a key tool for increasing a waste diversion rate, but only if implemented properly – working with the effected industry early (before the designation letter is crafted) and often is an important first step. Harmonization with other provinces/territories is also an important component of any stewardship approach. The recently approved CCME principles for e-waste provide an excellent framework here:
http://www.ccme.ca/initiatives/waste.html?category_id=80
- A responsible approach to the fourth "R", energy recovery (i.e. plastics used as fuel in a copper smelter) must be considered under the Waste Diversion Act. This is an important and accepted method in the proper recycling of electronics worldwide.
- Compliance & enforcement investments by the Ministry of the Environment are required, and would pay important dividends to increasing diversion rates. One important factor will be to ensure those stewards located outside of the province but still "doing business in Ontario", be clearly obligated and required to comply.

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- While e-waste is a growing solid waste stream, by any estimates it will only amount to approximately 1% of total solid waste generated. Clearly, our industry is already stepping forward as a responsible actor.
- Government can serve as an effective model here. For example, the Government of Ontario should ensure its own internal procurement policy allows it to do business only with those firms in compliance with any related environmental regulations.
- We do not support waste diversion programs aimed at corporations that have varying requirements based upon the company's size. A level-playing field requires all firms be subject to the same conditions.
- Landfill bans must be considered carefully. International experience here points clearly to the fact that disposal bans should follow solutions, not solutions following bans.
- We believe that the use of common, consumer-convenient waste management infrastructure will yield the most economical results overall. This may mean revisiting the requirements by which Ontario municipalities participate in waste management programs.
- Ontario should consider investing in recycling technology R&D for key problem areas (i.e. plastics and wood cabinetry would be examples in our sector). Consideration should also be given to an incentive program for environmental leaders in various sectors.
- When measuring Ontario's diversion targets, the overall volume, not the weight, of a given waste material should be a key consideration here. For those inert materials, which will end up in the landfills, the relative weight should not be the focus.

Yours truly,

Jay Illingworth
Vice President