



Krista Friesen
Ministry of the Environment and Climate Change
Resource Recovery Policy Branch
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Sent via e-mail: Krista.Friesen@ontario.ca

Dear Ms. Friesen,

**Re: EBR Registry Number 012-5832
Draft Electrical and Electronic Equipment (EEE) Regulation**

On behalf of our Ontario members, the Canadian Association of Recycling Industries (CARI) would like to submit the following comments on the Draft Electrical and Electronic Equipment (EEE) Regulation.

CARI supports the *Resource Recovery and Circular Economy Act's* fundamental goal of creating a competitive circular economy. However, we feel the Draft EEE Regulation must recognize that scrap metal recyclers are an essential part of the EEE recovery and diversion process, and must consider the success of existing market-based recovery programs.

CARI recognizes that the Draft EEE Regulation seeks to reduce municipalities' financial burden in the operating of collection programs and to encourage increased waste diversion. Scrap metal recyclers are fundamental to achieving both of these objectives.

In many communities, the local scrapyards provides the most efficient drop-off point for individuals to bring their end-of-life materials. Community members like the convenience of being able to bring an assortment of products (including EEE) and scrap material to one location, and scrapyards have the infrastructure and knowledge to efficiently and effectively manage a variety of materials. The scrap recyclers will sort material by type and/or quality, remove contaminating substances, and bundle the material into forms suitable for transportation. After an economically transportable amount of material has been collected it will be sold to a large processor.

These smaller 'collector' yards play an essential role in diverting EEE of all kinds from landfill. For many of these businesses, additional reporting and record-keeping requirements will add a costly



and unnecessary burden. Without a market-based system, companies that invest the necessary time and money into complying with EEE management requirements may no longer have access to a consistent supply of material, and as a result some will be forced to stop collecting the material or to shut down altogether. Uncertainty of supply discourages innovation. EEE processors depend on these collector yards, and together they create a supply chain of specification-grade commodities that flow back into the supply stream.

CARI understands the Draft EEE Regulation is designed for products that require regulatory intervention to achieve a circular economy. However, with respect to “Large Equipment” as defined in Schedule 1, we believe the Draft EEE Regulation should recognize that the recovery and recycling rate of most large equipment (i.e., “white goods”) in Canada is currently as high as 92%¹. We have seen no evidence that large equipment is being managed improperly, and no analysis of environmental outcomes supporting moving away from a market-based system for these goods. Most Canadian retailers have existing fee-based programs in place to remove a consumer’s old large appliance upon delivery of a new large appliance. The majority of the white goods recovered in Ontario are currently collected through retail programs and private collectors.

The recycling efficiency rate of a product is not dependent on the processors. To improve the percentage of materials recovered from EEE, manufacturers must be encouraged to design their products with more recycled content and with easily recyclable materials. The recovered material from most large equipment is comprised of approximately 75% scrap metals (including ferrous and non-ferrous material). Metal recycling is a competitive, commodity-driven, international industry and is an essential part of the global manufacturing chain. The valuable scrap metal recovered from Ontario’s large equipment might be sold to Ontario mills and smelters, or it might be traded across the province, across Canada, into the U.S., or internationally.

Given the high value of this material, CARI believes the existing market-based recycling system is the most successful method of managing large equipment. Imposing policy restrictions and reporting burdens on scrap metal recyclers that collect and process large appliances will do little to improve diversion rates for these products, and will put Ontario businesses at a competitive disadvantage.

CARI members are committed to designing and operating their businesses based on the efficient use of energy, resources, and materials; to complying with all legal requirements that affect their

¹ White Goods Assessment – Ontario, March 2009



operations and products; and to working actively with governments and the public to develop equitable and attainable standards. In order to develop a circular-economy program that is best for Ontario consumers, businesses, and the environment, CARI believes the Draft EEE Regulation should not proceed without further consultation with major household appliance manufacturers and scrap metal recyclers.

Thank you for reviewing our comments. We look forward to collaborating with you in the future.

Tracy Shaw
President and CEO