

Green Action Centre (formerly RCM) comments on Household Hazardous Waste and E-waste plans

Green Action Centre has identified a number of elements to look for in a Household Hazardous Waste (HHW) and E-waste plan.

Objectives and targets -- Zero waste, zero harm are the ideal objectives. Consequently we look for high recovery rates and safe handling.

Monitoring, research and development -- Since hazardous items are prohibited from landfills and sewage disposal, waste and sewer audits provide the ultimate test of effectiveness of recovery programs. Targets and program elements should be ramped up until hazardous materials largely disappear from the waste stream. Research is needed for high performance in all aspects of the program including safer substitutes, safer use and processing, and effective collection systems, market development, and promotion and education.

Collection access -- A basic standard for consideration is that it should be as easy to safely dispose of items as it was to acquire them. Retailers should play a key role for most items and disposal generally should not be car dependent. This means pick-ups available for large items. Special attention needs to be paid to safe handling for HHW.

Promotion, education and information

Incentives, such as trade-in discounts and deposits and rebates, can encourage customer participation.

Public input and governance -- Advisory committees and public consultation are important for shaping programs, gathering feedback to improve effectiveness, and demonstrating accountability.

Costs and revenues -- We endorse the first objective of CCME's Canada-wide Action Plan for Extended Producer Responsibility, which presumably Manitoba has signed on to:

To encourage producers to adopt full life-cycle cost accounting for their products and, in particular, to ensure the costs of the end-of-life management of products are treated similarly to other factors of production (such as manufacturing, distribution, marketing and sales) and are incorporated into wholesale and retail product prices.

We also believe it is contrary to the principles of fair competitive business practices and informed consumer choices to advertise different prices in flyers and ads or on store shelves and price tags than the consumer must pay at the till.

With these elements in mind, we will comment on the individual plans submitted. One observation is that in Ontario, Stewardship Ontario seems to be a single operator responsible for all HHW. What are the pros and cons of that arrangement vs multiple stewardship organizations in Manitoba?

Call 2 recycle (dry cell batteries under 5 kg)

This is a commendable mature program, undergoing expansion from rechargeable-only to all batteries. They have well developed safety protocols and an efficient collection system that is costless to participants. Funding is provided by battery manufacturers. Responsive to stakeholders.

Issues:

1. Need to extend recruitment of collection points to more retailers and remote communities.
2. Public awareness needs to be ramped up and recycling information provided (a) at point of purchase and (b) on packaging and batteries
3. Negligible recycling of non-rechargeable batteries, which are the majority. Targets of 11% to 25% of sales over 5 years seems insufficient. (But will undertake research to determine fate of non-recycled batteries. Note analysis of behavioural types.) Explanation: recycling is voluntary, not mandatory. Question: what landfill bans are currently in place?
4. Shared responsibility model in section 10 omits retailers. They should be encouraged to assume responsibility.
5. Question: can batteries be collected through blue box?

Canadian Battery Association (Lead-Acid Batteries or LABs)

Initiation of a national program beginning in Manitoba. Yet the industry already recycles 97% of lead batteries. Deposit/credit system at the wholesale level. What more is needed? (a) more regulation, accountability?; (b) safety concerns?-(note these are regulated only interprovincially, but not within Manitoba); (c).Remote collection the major challenge. Recycling pays for itself. CBA member fees cover administrative costs. Hence no eco-fees. Note that RCM is mentioned twice: (a) local steering committee will join RCM, and (b) educational materials will be provided for RCM to distribute. “Reverse distribution” model + free pick-ups and special collection events by some members. 3-step dispute resolution.

Issues:

1. Plan is somewhat sketchy, yet a successful recovery program is already in place.
2. “Reverse distribution” model of recovery doesn’t work for remote communities. Need to develop alternative model (currently consulting). Logistical issues for roadless communities.
3. 100 retail locations will pick up – yet there must be many more that sell batteries. Clarify.
4. Not clear if free pick-ups and special collection events are part of the plan.
5. Accountability and transparency – join RCM. That’s flattering but not the same as audited reports. Is this an issue?

Interstate Battery System of Manitoba (also LABs)

What is the relation of this stewardship program and CBAs?

Note they have >100% recycling rates because they aggressively collect junk batteries and models they don't sell. Note too they have 500 dealers across Manitoba, who collect a battery for each one they sell and take small quantities of additional batteries. Why only 100 for CBA if they represent all the major manufacturers? Does Interstate represent Johnson Controls? LAB recycling appears very competitive. Note all pricing is on an exchange basis. Charge consumer who doesn't surrender a battery.

Two rival battery organizations should cover all but remote communities well. Are there safety concerns?

Medications Return Program

Operating in BC since 2000. Bringing to MB.

Issues:

1. Most sewage contamination occurs from excretions, not improper disposal, so while the program is desirable, it doesn't address the major contamination issue.
2. Only 210 pharmacies participating. How many are there in the province? Goal should be for every dispensing pharmacy to recycle.

MAARC's antifreeze recycling program

Expand existing used oil + containers & filter collection to include antifreeze fluid and containers.

Issues:

1. Collection system not clear
2. User pays EHC. How is this audited (payments + remittance). Is this the environmental levy that repair garages charge? What about DIY customers?
3. Acceptable access if every service station and garage service collects fluids and containers. How does this work? Note pump island pilot in progress.
4. Why can't empty antifreeze containers be recycled in blue boxes?

Switch the 'stat (mercury-containing thermostats)

Primarily collected through furnace service companies, both from service calls and drop-off. Also piloting a send-back option for remote communities. Targets – 50 contractors and 25% available switches in first year moving to 150 contractors and 75% recovery in year 5.

Issues:

1. The ramp-up is too slow.

Product-care household hazardous waste

This organization may have the most challenging task because of the number and range of different products under their umbrella. The plan reflects (a) general experience based on work in other provinces, but (b) extreme vagueness and generality regarding Manitoba operations and warning not to set initial expectations too high because of absence of Manitoba recycling infrastructure. It all remains to be set up through contracts for local collection depots, transportation and possibly processing. On the other hand, the appendix on public consultation gave the most detailed analysis of and response to comments from the public.

Issues:

1. The action plans on p. 17 are abbreviated in the extreme. Department expectations re roll-out should provide additional direction. Product-care needs to do a lot of work before April 1, 2011, perhaps in partnership with other stewards.
2. Determine which products can be recycled through retailers and which might require separate depots.

Manitoba end-of-life electrical and electronic equipment

This is another very sketchy program. A board of directors has yet to be determined and they will make all the decisions, so the plan is quite non-specific, except for its insistence on assessing Environmental Handling Fees (EHF) including collection at point of purchase. Does this mean that retailers have an obligation to remit directly to the IFO? Note, however, that industry has taken a number of design for environment measures (<http://www.epsc.ca/dfe.htm>).

Issues:

1. Over half the report describes a consultation, which was quite inadequate. The open house explaining the program occurred on Thursday August 5 with comments due Monday August 9.
2. The rest of the report is sketchy, leaving decisions to a not-yet-determined board of directors. The industry seems to be slow in organizing its stewardship program.
3. The EHF contravenes the intent of the CCME Canada-wide Action Plan and will require an explicit exemption from the Minister, according to the regulations. We have previously filed briefs on this topic.
4. Indicates the board may establish a local advisory council. Given the incompleteness of this application, we think it should do so in the start-up phase.
5. No performance targets will be set until 2 years into the program. [Note other stewards have done this by extrapolation from experience in other jurisdictions. Why can't this be done here?]

Summary

1. There are a number of points where an integrated or collaborative approach may be needed. (Single steward approach of Stewardship Ontario has advantage of integrating across products.)
 - a. Common depots and events – particularly in remote communities.
 - b. Cross-products: e.g. electronics and batteries, materials and containers
 - c. Waste audits to determine what is getting through to landfills and sewers – needed to calibrate adequacy of targets and effectiveness of programs.
 - d. Recycling and non-recycling behaviour research.
 - e. General recycling promotion and education including common web page. (Public should have a single starting point in web searches – e.g. Recycle Manitoba.)
2. Some plans are already developed and operating in Manitoba and just need expansion and further promotion and education: dry and lead acid batteries, medications, MAARC's antifreeze.
3. Three are moving in from out of province and have operating experience elsewhere: Switch the 'Stat, Product Care HHW and Manitoba end-of-life electrical and electronic equipment. These need an early signal from MB Conservation to get going. The latter two are sketchy in the extreme for their MB action plans. May need an advisory committee & MB Conservation to work with them.
4. Few meet the standard of "reverse distribution" so that it is as easy to recycle as to purchase. Batteries, oil and anti-freeze and meds have the potential to do this in the first year and should be encouraged to do so. Cell phones and small electronics should be possible too. Larger electronics and product care hazardous waste may present safe handling issues for many products requiring a depot approach. These should be widespread.
5. Several mention the importance of MB Conservation enforcing compliance to avoid free riders.

6. Some will collect some IC&I waste and others not. MB Conservation needs to make sure all hazardous and e-waste is dealt with, whether by these stewards or otherwise.
7. QUESTION: Which items have landfill bans?
8. Recycling fees charged to customers are not an issue for most but are in particular for e-waste. This is contrary to CCME and possibly Manitoba Consumer Protection, depending on how it is handled.