TAKE BACK THE LIGHT

A program of Recycling Council of Ontario

Waste Programs
Waste Reduction and Management Division
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Via Email to dechethgwaste@ec.gc.ca

Friday, November 28, 2014

Subject: Discussion Paper – Proposed Elements for a Code of Practice for the Environmentally Sound Management of End-of-life Mercury-containing Lamps and Targeted Guidance for the North

To Whom It May Concern,

The Recycling Council of Ontario (RCO) supports the initiative to improve the recovery and proper recycling of mercury-containing lamps in Canada. In the absence of regulations a Code of Practice could be a useful tool to guiding to supporting improved management of these lamps. Please accept these comments on your discussion paper.

RCO's comments respond generally to the questions provided in the Discussion Paper under section 6 *'Seeking Your Views'.*

Environment Canada: Are there sources of information that should be considered during the development of the code or targeted guidance (e.g., international standards, standards developed by industry or third party certification bodies)?

RCO: During the development of the Code of Practice Environment Canada should review the following:

1. Environmentally Sound Management concepts developed by international organizations like the Bureau of International Recycling (BIR) and the Organization of Economic Cooperation and Development (OEDC)
2. Review resources from the Northeast Waste Management Officials' Association, in particular their 2009 Report titled, *Review of Compact Fluorescent Lamp Recycling Initiatives in the U.S. and Internationally*
3. RCO – Take Back the Light – Program requirements for mercury-containing lamps recycling processors

Environment Canada: What are some of the challenges faced in recycling mercury lamps?

RCO: Some of the challenges include:

1. Cost – mercury-containing lamps are fragile and contain a variety of materials and therefore tend to be costly to handle, transport and recycle.
2. Transportation/storages – most recyclers prefer to received the bulb unbroken which can poses transportation and storage challenges
3. Clear understanding between residential vs IC&I – collection of spent lamps are typically handled differently at end of life depending on whether they are generated in the residential or Industrial, institution or commercial (ICI) sector. Collection, storage and transport needs are different for both scenarios.

4. Lack of enforcement of existing regulations. – where there are regulations that require special handling and mandatory recycling these enforcement is limited.
5. Lack of Canada-wide standards for lamp recyclers to ensures safe handling, maximum recovery of materials and highest and best use of materials.
4. Lack of tracking and reporting – there are no mechanisms in place to track how many lamps (and how much mercury) is sold into the Canadian marketplace and how many lamps are recovered at the end of their useful life.
5. Accessibility to Recycling facilities– Getting the lamps to legitimate recyclers can be expensive as Canada does not have a lot of recycler's across the country
6. Dealing with associated materials eg. ballasts, PCB ballasts – often other materials beyond lamps are generated when spent lamps are generated and a method should be developed for dealing with those as well
7. Consider education and Awareness– many people are unaware that fluorescent lamps contain mercury and therefore do not understand the need for proper management

Environment Canada: What elements would be most useful in a code or targeted guidance?

RCO: The following elements would be useful in code or targeted guidance document:

1. Tracking and reporting tool to follow the movement of the lamps and quantify recovery.
2. Specific handling recycling standards that can be used as a reference for consumers, retailers and recyclers
3. Education resources and information
4. Consolidated point to house information about recycling programs across the country
5. Best practice regulation that can be imported by provincial jurisdictions that do not have regulations

Environment Canada: What are your views on a reporting mechanism?

RCO: It is very important to include a reporting mechanism in the code of practice or guidance document because it is difficult to manage what is not tracked and reported on. Having a reporting mechanism will enable Environment Canada and its stakeholders to assess the effectiveness of its code as well as the effectiveness of programs across the country. Reporting can also be used to ensure transparency and following the lamps from point of generation to final disposition.

Environment Canada: What type of information would stakeholders have that could be used for reporting and/or assessing the effectiveness of the code and targeted guidance?

RCO: Receiving information from manufacturers, importers, product distributors and retailers would provide the information needed to enable Environment Canada to understand the amount of mercury-containing lamps entering the Canadian market and that which is being recovered.

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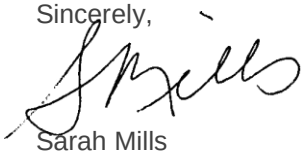
Environment Canada: Do you wish to participate in consultations and/or be added to our distribution list for updates on the development of the code or targeted guidance?

RCO: Yes, the RCO is interested in participating in the consultations and being added to the distribution list for updates on the development of the code and targeted guidance document.

Sincerely,



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