

Canadian Association of Physicians for the Environment | Canadian Environmental Law Association | Citizens' Network on Waste Management | David Suzuki Foundation | Environmental Defence Canada | Greenpeace Canada | Registered Nurses Association of Ontario (RNAO) | Toronto Environmental Alliance

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Waste Diversion Ontario Board  
4711 Yonge Street, Suite 1102  
Toronto ON M2N 6K8

April 17, 2014

Dear Board Members,

***Re: Comments on Call2Recycle Battery Industry Stewardship Plan (ISP) proposal***

In February 2014, a dozen environmental non-profit organizations working in Ontario and across Canada submitted a joint letter to the Board of Waste Diversion Ontario raising concerns with the Call2Recycle ISP (attached). As stated in our joint letter, we are concerned with the proposed definition of 'Recycling' and the possibility that new programs might apply a definition for recycling that results in poorer environmental outcomes.

We are, therefore, pleased with the WDO Board's decision made on March 12, 2014 to review a number of key issues associated with the Call2Recycle Industry Stewardship Plan (ISP) and specifically the issue of battery recycling efficiency.

However, we are very concerned that the WDO plans to make a decision on the Call2Recycle ISP in June, before the battery recycling efficiency review is complete (expected in September), as such a decision would fundamentally undermine the value of the review. We urge you to delay the decision until the conclusion of the consultation in progress. Furthermore, we urge you to include participation by ENGOs in this process to ensure perspectives from other stakeholders are heard.

This review is essential to determine what constitutes recycling and the relative efficiency of various approaches and technologies for recycling of batteries in terms of recovering materials, reducing waste and minimizing energy use and discharges to the environment.

Determining recycling efficiency is key to determining whether the Call2Recycle ISP results in outcomes that are equal to or better than those being achieved by Ontario's existing Municipal Household and Special Waste (MHSW) Program as approved by the Minister of Environment.

We urge the WDO Board to make no further decisions on the Call2Recycle ISP until there is clarity as to what constitutes legitimate battery recycling. In addition, WDO should not develop a process by which battery recycling processors are to be selected for the Call2Recycle ISP until this issue around battery recycling efficiency has been decided.

Additionally, we are expressing our interest to participate in this review to provide our perspective on the definition of recycling.

Respectfully yours,

Toronto Environmental Alliance (Emily Alfred, Waste Campaigner; 416-596-0660)  
Canadian Environmental Law Association (Fe de Leon, Researcher)  
Canadian Association of Physicians for the Environment (Gideon Forman, Executive Director)  
Citizens' Network on Waste Management (John Jackson, Coordinator)  
David Suzuki Foundation (Faisal Moola, Director General, Ontario and Northern Canada)  
Environmental Defence Canada (Keith Brooks, Program Manager, Blue Green Canada)  
Greenpeace Canada (Joanna Kerr, Executive Director)  
Registered Nurses Association of Ontario (Doris Grinspun, Chief Executive Officer)