

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

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January 20, 2014

The Honourable Jim Bradley  
Minister of the Environment  
77 Wellesley Street West  
11th Floor, Ferguson Block  
Toronto, ON M7A 2T5

Dear Minister Bradley,

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

We, the undersigned environmental and health organizations, have serious concerns with the Battery Industry Stewardship Plan (ISP) proposed to Waste Diversion Ontario (WDO) by Call2Recycle. We urge you and your Ministry to actively participate now in the current WDO review of the ISP proposal on battery recycling to ensure that WDO decisions do not result in weakening the waste diversion efforts in Ontario.

The Call2Recycle ISP weakens recycling requirements for batteries in Ontario by adopting a definition of recycling that is significantly weaker than the definitions in the existing Minister-approved Battery Incentive Program. Call2Recycle states that they will meet the Minister-approved recycling efficiency targets of the existing program. However, they are only able to assert this by using a different, less strict, definition of recycling.

It is crucial that stewardship programs mandated by and regulated by the Province require the highest and best standards for recycling processes and efficiency. Please see the attached letter to the Board of Waste Diversion Ontario, expressing the concern of environmental and health organizations in Ontario.

We believe that it is the Minister's obligation to ensure that the environmental standards are met and maintained in waste stewardship programs, and that efforts to lower those standards are rejected.

It is essential that your Ministry intervene now because, if the WDO approves the plan, the Waste Diversion Act does not provide a mechanism for the Minister to intervene or for the public to appeal the decision.

Respectfully yours,

Toronto Environmental Alliance (Emily Alfred, Waste Campaigner; 416-596-0660)  
Canadian Environmental Law Association (Fe de Leon, Researcher; 416-960-2284)

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)

Local Enhancement and Appreciation of Forests (LEAF) (Janet McKay, Executive Director)

Registered Nurses Association of Ontario (Doris Grinspun, Chief Executive Officer)

Cc:

Gord Miller, Environmental Commissioner of Ontario

John Armiento, Manager, Waste Diversion Unit, Ministry of Environment

Jodi Tomchyshyn London, Manager of Policy & Planning, Waste Diversion Ontario

Waste Diversion Ontario Board of Directors