# Terrapure Environmental Response to Proposed Regulations for Recycling of Electrical and Electronic Equipment (EEE) and Batteries

 **Ministry of the Environment, Parks and Conservation
ERO Number: 019-0048**

**Introduction**

Terrapure welcomes the Provincial Government’s proposed regulations for Recycling of Electrical and Electronic Equipment and Batteries. We understand the importance of improving environmental outcomes while maintaining economic growth and reducing costs to consumers. Our comments will focus on one aspect of the proposed regulation that we feel is unnecessary over-regulation, as the diversion and recycling goal is already being achieved.

\* NOTE: Terrapure Environmental has also submitted a separate response regarding questions about the proposed regulation.

**Terrapure and its Role**

Terrapure is a leading Canadian provider of professional, cost-effective environmental and industrial services and recycling solutions that help address industry’s environmental challenges. With an unwavering focus on environmental, health and safety excellence, the company provides services that minimize waste and maximize the recovery or recycling of valuable industrial by-products through a coast-to-coast network of facilities and on customer sites.

Terrapure has been the Canadian leader in lead acid battery (LAB) recycling since it acquired Tonolli Canada in 2016 in addition to our existing plant in Ville Ste-Catherine, Quebec. Since then we have been the largest recycler of spent lead acid batteries in Canada and are the only company in Ontario that processes LABs. We receive spent lead acid batteries and ensure that all materials are processed sustainably. Because lead can be recycled infinitely, Terrapure uses advanced processes and best practices to recover and turn around high-quality lead and plastics at a rate of over 90%. In 2018, Terrapure processed nearly 10 million batteries for recycling in Ontario alone, making its battery-recycling operations a prime example of a circular economy at work in a market economy. Through efficient operations, Terrapure offers stable and competitive pricing while exceeding regulations for environment, health and safety.

**Lead Acid Battery Recycling is a Circular Economy**

Lead Acid Batteries (LABs) are the most effectively and efficiently recycled product in the world, and the market driven industry has found a way to keep costs low for consumers while meeting and even exceeding environmental, health and safety standards.

Through its practice of recycling, the LAB industry has developed a self-sustaining circular economy. LABs are the most recycled product in the world, at a rate of over 90%. The average time turn around to re-manufacture spent LABs in Ontario is approximately 90 business days.

Without additional regulation and red-tape, we are able to achieve this high rate of recycling LABs because of a well-developed industry, the high value of recycled lead and the liability issues surrounding their disposal.

Included in our high recycling rate are batteries from remote communities. It is a geographic reality that batteries from these communities do not reach us as quickly as from other parts of the Province, however they do eventually come to us for recycling. Further regulation will not speed up the rate at which we are able to receive these batteries, as regulation does not account for the geographic realities of Ontario.

**Increased Costs to Businesses and Consumers**

The mandate of the Government of Ontario since its election has been to reduce red-tape and ensure Ontario is ‘Open for Business.’ Under the proposed regulation, manufacturers and distributors of LABs would be forced to pay for oversight authority; therefore, manufacturers and distributors would need to consider implementing an Environmental Handling Fee (EHF) to cover the significant cost of reporting, auditing and funding of the oversight authority. Therefore, including LABs in the proposed regulation would result in significantly increased administrative burden related to tracking, reporting and auditing.

The regulation will not increase recovery rates as there is virtually no room for environmental improvement. The regulation will only have negative consequences on consumers in the form of higher prices, as the cost of additional administration and oversight is passed on.

**Proposal – Remove LABs from Regulation**

The language of the proposed Regulation has evolved to include a battery category of ‘large batteries more than 5kg’, a category where LABs make up the majority. We ask that LABs removed and not included in the final regulation.

To ensure the performance of industry stays high we propose adding a provision to the regulation mandating LAB recyclers report to the Ministry annually on our achieved recycling rates. This minor amendment could be accommodated easily by the LAB recycling industry at no additional cost to Ontario consumers as this data is already tracked.

**Conclusion**

Terrapure appreciates the opportunity to offer comment on the Ministry of Environment, Conservation and Parks’ proposed regulations regarding EEE and Batteries. The intent of the proposed regulations is to improve environmental outcomes, ensure economic growth and reduce costs and burden. In the case of LABs, this is already happening. Therefore, the inclusion of lead-acid batteries in the proposed regulation is unnecessary red-tape and over-regulation that would result in an additional burden to Ontario businesses and higher costs to business and consumers.

We would welcome the opportunity to meet with the MECP to discuss these comments and the issue of LAB recycling further.

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