

Municipal Hazardous or Special Waste Consultation Document

WDO Consultation Plan
to Support the
Development of a
Diversion Program for
Municipal Hazardous or
Special Waste

List of Stakeholder
Participation

Issue-Specific
Comments Received

May 23, 2007

Municipal Hazardous or Special Waste

***WDO Consultation Plan to Support the Development
of a Diversion Program for Municipal Hazardous or
Special Waste (MHSW)***

May 23, 2007

Table of Contents

1.0 Background..... 1

2.0 Objectives and Scope..... 1

3.0 Key Participants in Consultation..... 2

 3.1 Industry Stewards 2

 3.2 Affected Industries 3

 3.3 Municipalities..... 3

 3.4 General Public..... 4

4.0 General Elements of Consultation..... 4

 4.1 WDO Website 4

 4.2 IFO Website 4

 4.3 Database of Identified Stakeholders 4

 4.4 Electronic Notice to Identified Stakeholders 5

 4.5 Consultation Paper..... 5

 4.6 Consultation Workshops/Webcasts 5

 4.7 Plan Submission and Explanation of Results 6

 4.8 Comments to WDO..... 6

5.0 Consultation with Industry Stewards 6

6.0 Consultation with Affected Industries 7

7.0 Consultation with Municipalities..... 7

8.0 Consultation with General Public..... 7

Figures

Figure 1 – Summary of Consultation Workshop and Webcast Topics..... 9

1.0 Background

Waste Diversion Ontario (WDO) is a non-crown corporation created under the Waste Diversion Act (WDA) on June 27, 2002. WDO was established to develop, implement and operate waste diversion programs for a wide range of materials. To date, the Minister has requested diversion programs for Blue Box Wastes, Used Tires, Used Oil Material, Waste Electronic and Electrical Equipment (WEEE) and Municipal Hazardous or Special Waste (MHSW).

The WDA empowers the Minister to designate a material for which a waste diversion program is to be established. Once the Minister has designated a material through a regulation under the WDA, the Minister directs WDO to develop a diversion program. WDO is required by the Act to develop a waste diversion plan for the designated waste in co-operation with an Industry Funding Organization. Waste Diversion Ontario is further required by the Act to conduct public consultation on any matter referred to it by the Minister.

On December 11, 2006, the Minister filed a regulation under the WDA designating MHSW. On December 12, 2006, the WDO Board of Directors received a letter from the Minister of the Environment requesting a diversion program for MHSW. The Minister's letter outlined program requirements and requested a consultation plan.

2.0 Objectives and Scope

Waste Diversion Ontario will develop and implement a consultation process that will result in a consultation process that is thorough and will ensure a beneficial exchange of information, ideas and opinions among those who may be affected by the development and implementation of a diversion program for MHSW.

A number of parties are considered to be stakeholders in this process, including the stewards of products that result in MHSW and the industry associations that support their work. Additional interested stakeholders include affected industries; municipalities; environmental and community groups with a particular interest in waste management, water quality and public health issues related to the life cycle of MHSW; small quantity industrial, commercial and institutional generators of MHSW; professionals working in related fields (e.g. environmental consultants; and the general public.

The Addendum to the Minister's Program Request Letter listed MHSW to be included in Phase 1 and Phase 2 and made reference to future phases of the program. Stewards of materials in Phase 1, Phase 2 and future phases and stakeholders interested in these materials will be encouraged to participate in the consultation process for the development of a diversion program for Phase 1 Consultation Plan to Support the Development of a Diversion Program for Municipal Hazardous or Special Waste materials. The Minister will, at a future date, notify WDO when the Phase 2 materials are to be included in the MHSW program.

The Phase 1 and Phase 2 materials identified in the Minister's Program Request Letter do not represent the full range of MHSW materials in Ontario Regulation 542/06. The Minister may direct WDO to include additional MHSW materials in future phases of an MHSW program.

The Program Request Letter required that Stewardship Ontario act as the Industry Funding Organization (IFO) for MHSW. Stewardship Ontario will be responsible for implementing this consultation plan and managing the development and implementation of the MHSW diversion plan, in co-operation with WDO.

While this consultation plan is being implemented, the plan development process will also include:

- Periodic review of information arising from the consultation process and related to MHSW plan development by the Stewardship Ontario Board and those MHSW stewards directly involved with Stewardship Ontario in plan development;
- Periodic review of information arising from the consultation process and related to MHSW plan development by the WDO Executive Director and WDO Board; and
- Periodic meetings among WDO staff, Stewardship Ontario staff and Ministry of the Environment staff and legal counsel.

3.0 Key Participants in Consultation

The consultation process will be targeted at four key audiences:

3.1 Industry Stewards

Stewards

This group is comprised of representatives of brand owners and first importers of products, which may become MHSW, for sale in Ontario who will be registering with the IFO (or implementing their own Industry Stewardship Plan as allowed under the Act and as approved by WDO). As outlined in Clause 5 a) of the Addendum to the Minister's Program Request Letter, these products shall be referred to as Municipal Hazardous or Special Material.

Industry and Trade Associations

Industry and trade associations may assist in the identification and notification of individual company representatives, their members. These associations include:

- Association of International Automobile Manufacturers of Canada
- Automotive Industries Association of Canada
- Canadian Consumer Specialty Products Association
- Canadian Council of Grocery Distributors
- Canadian Federation of Independent Grocers
- Canadian Hardware and Housewares Manufacturers Association
- Canadian Household Battery Association
- Canadian Independent Petroleum Marketer's Association
- Canadian Paints & Coatings Association
- Canadian Petroleum Products Institute
- Canadian Vehicle Manufacturers' Association
- Direct Sellers Association
- Environment & Plastics Industry Council
- Food and Consumer Products of Canada
- Japanese Automobile Manufacturers Association of Canada

- Ontario Automobile Dealers Association
- Post-Consumer Pharmaceutical Stewardship Association
- Rechargeable Battery Recycling Corporation
- Retail Council of Canada

3.2 Affected Industries

Representatives of other industries that may be affected by the development and implementation of a diversion program for MHSW include:

- distributors of products that may result in MHSW
- retailers of products that may result in MHSW
- generators of small quantities of MHSW (as defined in Ontario Regulation 347)
- private companies providing collection of MHSW
- transporters of MHSW
- processors and recyclers of MHSW
- end markets for processed MHSW
- operators of disposal facilities for MHSW
- professionals working in related fields

Industry associations representing these affected industries will be included in the consultation process. These associations include:

- Canadian Council of Grocery Distributors
- Canadian Federation of Independent Grocers
- Ontario Waste Management Association
- Ontario Environmental Industries Association
- Retail Council of Canada

3.3 Municipalities

Some municipalities currently operate permanent MHSW depots or provide special MHSW events while other municipalities do not provide this service. Consultation with both types of municipalities will be important in developing an understanding of the role of municipalities in the delivery of an MHSW program. Municipalities or representatives of municipalities include:

- *Association of Municipalities of Ontario (AMO)*
- *City of Toronto*¹
- *Association of Municipal Recycling Co-ordinators (AMRC)* - Recycling services offered by Ontario municipalities are typically managed by recycling co-ordinators. These recycling co-ordinators are responsible for municipally operated MHSW collection systems.
- *Municipal Waste Integration Network (MWIN)* - Municipal recycling co-ordinators also receive information through MWIN.
- *Recycling Council of Ontario (RCO)* - Municipal recycling co-ordinators also receive information through RCO.

¹ City of Toronto is not a member of AMO

3.4 General Public

Residents of Ontario are consumers of products that may result in MHSW and have a direct interest in the development of a diversion program for these products.

There are two elements of the general public: those members of the public who are already engaged in the issue, either through direct involvement in MHSW management or other waste management issues; and those members of the public who have no awareness of the challenges involved with MHSW end of life management.

It is important to involve the engaged members of the public in the process of designing a plan for effective management of MHSW. This will include environmental and consumer groups with a strong interest in waste diversion, issues related to public health that may concern the life cycle of MHSW, water quality, and environmental policy.

It is also important to reach members of the public who are not aware of MHSW end of life management issues with information about diversion program plan development and the consultation process.

The consultation process will recognize the particular challenges of reaching members of the public who reside in northern and remote communities through use of local media and the ability for participation in workshops via webcast.

4.0 General Elements of Consultation

The consultation process will contain the following elements:

4.1 WDO Website

The WDO website will be used to outline the consultation process and schedule, post consultation documents for comment and receive comments from industry, municipalities and the general public.

4.2 IFO Website

It is anticipated that the existing Stewardship Ontario website will be modified to include a section dedicated to MHSW. The website will be used to outline the consultation process and schedule, post consultation documents for comment and receive comments from industry, municipalities and the general public.

4.3 Database of Identified Stakeholders

An inventory of identified stakeholders will be created in database format that will form the core of consultation activities.

4.4 Electronic Notice to Identified Stakeholders

Electronic notices outlining the consultation process, schedule and key dates for meetings and comments will be distributed to identified stakeholders.

4.5 Consultation Paper

Stakeholder consultations that involve technical or economic complexities are best anchored in a background paper that is regularly updated throughout the process to reflect the state of consultation. The consultation paper will be available on the websites.

4.6 Consultation Workshops/Webcasts

Issues will be presented to stakeholders at a number of workshops that will be simultaneously webcast. Questions and comments will be solicited from meeting and webcast participants during the event. Information presented at workshops and questions asked by participants will be available via archived webcasts for 90 days.

Workshop/Webcast # 1 - Introduction to the MHSW Plan Development Process

- Waste Diversion Act
- Waste Diversion Ontario
- Regulation Designating MHSW
- Program Request Letter
- Draft Consultation Plan
- Stewardship Ontario governance proposal
- Q&A on all topics

Comments will be requested on the draft consultation plan and the governance proposal. Comments received following Workshop/Webcast # 1 will be considered when finalizing the consultation plan and during Stewardship Ontario deliberations on governance.

Workshop/Webcast # 2 - Baseline Data and MHSW Plan Options

- Baseline data including existing municipal services for MHSW
- Definition of obligated materials
- Definition of obligated stewards
- Addressing small quantity IC&I generators
- Managing MHSW containers
- Options to reduce, reuse, transport, process, recycle and dispose of MHSW
- Advantages, disadvantages and economic implications of options
- Defining program accessibility
- Issues related to phasing of MHSW program design and implementation
- Municipal/IFO interface and transition issues related to IFO assuming responsibility for transfer, processing, recycling and disposal of MHSW
- Incentives to achieve plan objectives and targets
- Plan budget
- Setting stewards' fees
- How to prepare to meet obligations
- Q&A on all topics

Comments will be requested on the baseline data and plan options. Comments received following Workshop/Webcast # 2 will be considered when preparing the draft preliminary program plan.

Posting Draft Preliminary Program Plan

Following Workshop/Webcast # 2, Stewardship Ontario will post a draft preliminary MHSW diversion program plan on its website. Within 15 days of publication of the proposed plan, Stewardship Ontario will hold Workshop # 3 (with access via webcast) to explain its proposed program plan to stakeholders and for interested stakeholders and members of the public to provide comment.

Workshop/Webcast # 3 - Draft Preliminary Program Plan

- Draft diversion program plan for MHSW
- Issues raised during consultation and how they were addressed in the diversion program plan
- Process to submit comments on the draft plan

Comments will be requested on the draft preliminary plan within 10 days of Workshop/Webcast # 3. Comments received will be considered when preparing the draft final program plan.

4.7 Plan Submission and Explanation of Results

Stewardship Ontario will consider all comments received from stakeholders and will amend its draft preliminary MHSW program plan as appropriate based upon the comments. The draft preliminary plan will include responses to significant comments received during the consultation process, regardless of whether the comments were incorporated into the draft preliminary program plan.

Stewardship Ontario will submit the draft preliminary program plan to WDO for review, post the draft preliminary program plan on its website and provide notice to all stakeholders regarding the posting. The WDO will also post the draft preliminary program plan on its website.

4.8 Comments to WDO

Once the draft preliminary program plan has been submitted to WDO, affected stakeholders and members of the public may submit comments on the draft preliminary plan directly to WDO if they believe that the plan does not adequately take into account comments submitted during the consultation process. WDO will consider any such comments when it is evaluating whether to request that Stewardship Ontario modify the program plan or to approve the plan and forward it to the Minister for final review and approval.

5.0 Consultation with Industry Stewards

In addition to the general elements listed above, the consultation process with industry stewards will contain the following elements:

- *Press Release to Industry Associations:* A media release will be distributed to industry associations' newsletters to inform their members of the consultation process and schedule.
- *Press Release to Ontario and National Business Media:* A media release outlining the consultation process and schedule, with a special focus on workshops and webcasts, will be distributed to appropriate communications opportunities so that the workshops will be listed in "Coming Events" and the webcasts will be listed in "New Websites" columns.

6.0 Consultation with Affected Industries

Affected industries will be encouraged to participate in the consultation process outlined in Section 4. In the event that the three workshops provide inadequate time to deal with sectoral issues arising from the affected industries, additional working groups will be formed to address any specific issues that cannot be covered through direct submissions.

7.0 Consultation with Municipalities

In addition to the general elements listed in Section 4, the consultation process with municipalities will contain the following elements:

- **Websites:** AMO, AMRC, MWIN and RCO will be requested to post information on their websites. Materials will include contact persons for further information.
- **Notices to Municipalities:** Municipalities will be notified directly that materials are available via the websites.

Municipal issues raised during the workshops/webcasts will be addressed through discussions with representatives from affected municipalities and/or with representatives from the Association of Municipalities, City of Toronto (which is no longer a member of AMO), Rural Ontario Municipal Association and Federation of Northern Ontario Municipalities.

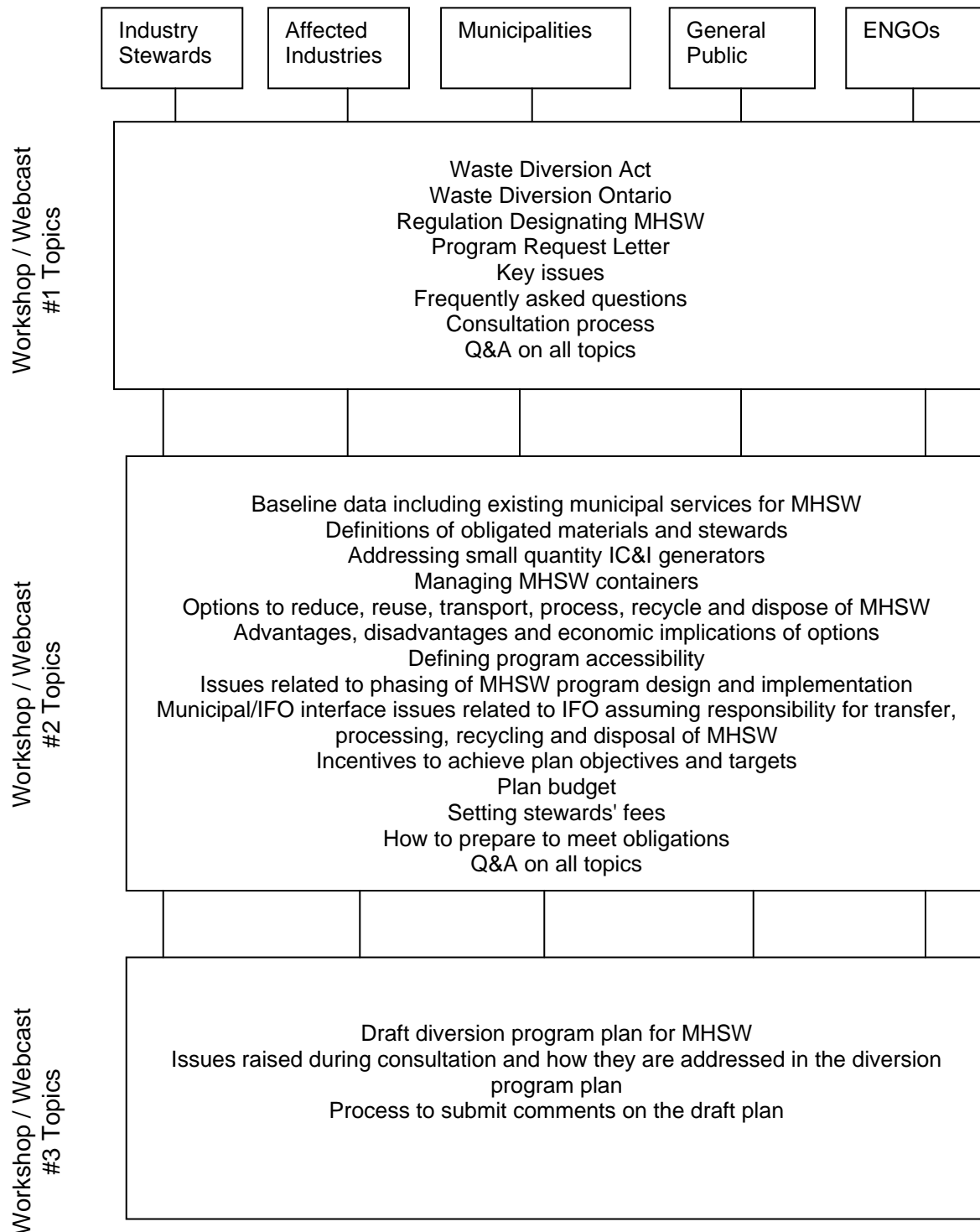
8.0 Consultation with General Public

In addition to the general elements listed in Section 4, the consultation process with the general public will contain the following elements:

- **Preparation of Background Information Paper:** Members of the public will likely require background information in preparation for informed participation in the consultation process. The paper will contain information on the Waste Diversion Act, Waste Diversion Ontario, the Minister's letter requesting a diversion program for MHSW, the environmental benefits of designating MHSW, a description of the consultation process and contact information. The information will be available in both print and electronic format. Print copies will be provided by WDO and Stewardship Ontario upon request. An electronic copy will be posted on the WDO and Stewardship Ontario websites.
- **Websites:** The availability of the background information package and details regarding the development of the program plan will be posted on the WDO and partnering websites.

- Press Release: A press release will be issued to notify the public of the availability of the background information package via the websites.
- Media Kit: A media information kit will be prepared for publishers, broadcasters and environmental columnists that outlines the benefits of an MHSW program.
- Guest Columns: Draft guest columns and open letters to the editors will be provided to Ontario community newspapers in order to reach the general public with information on the MHSW program and opportunities to participate in the consultation process.
- Notices to Identified Community Interest Groups: Identified interest groups will be notified directly that materials are available via the websites. These groups include:
 - Canadian Institute for Environmental Law and Policy
 - Citizen's Network on Waste Management
 - Clean Air Foundation
 - Consumers' Association of Canada
 - Environmental Educators of Ontario
 - Ontario Environment Network
 - Pollution Probe
 - Recycling Council of Ontario
 - Sierra Club of Canada
 - Sustainability Network
 - Toronto Environmental Alliance

Figure 1 – Summary of Consultation Workshop and Webcast Topics



Municipal Hazardous or Special Waste

Stakeholder Participation List

May 23, 2007

The following document lists all the stakeholders that have been involved in the MHSW Program Plan development consultation process, either through the submission of comments, attendance at one of the three workshop/webcasts, or both. Please note that original comment submissions are available on Stewardship Ontario's web site at http://www.stewardshipontario.ca/consultation/comments_archive.htm#mhsw

Workshop/Webcast #1 Stakeholders

Workshop/Webcast #1		
Involvement	Stakeholder	Name
Submitted Comments	Canadian Plastics Industry Association	Cathy Cirko
	Direct Sellers Association	Ross Creber
Participant in Workshop/Webcast	3M	Mark Jacob
	Agrium Advanced Technologies	Malcolm Small
	Agropur	Claude Hade
	AIAMC	Paul MacDonald
	American Eagle Outfitters	John Barnes
	AMRC	Cynthia Hyland
	AMRC	Ben Bennett
	Andrew Peller Limited	Grace Washington
	Apotex Inc	Erin Harrigan Podgaiz
	Apotex Inc.	Colin Simpkin
	Apotex Inc.	Renata Sztur
	Aquastar	Don Langille
	Armour Township	Leanne Crozier
	Association of Municipalities of Ontario	Milena Avramovic
	AstraZeneca Canada Inc.	Terry Yee
	Bausch & Lomb	Magda Barsoum
	Beaver Machine Corp.	Wayne Raybould
	Behr Process	Jon Kuch
	Bell Canada	Sherazad Adib
	Bioforce Canada Inc.	Monika Haefele
	Black & Decker	Janelle Schildgen
	Bluewater Recycling Assoc.	Francis Veilleux
	Bonne Bell Inc	Mark Wincek
	Bosch	Jim Papadopoulos
	Brendar Environmental Inc.	Brent Bolger
	Brendar Environmental Inc.	Torin MacPherson
	Brendar Environmental Inc.	Gordon Nijboer
	Bruce Area Recycling	Vince Cascone
	Bruce Area Solid Waste Recycling	Karrie Drury
	Brum's Dairy Limited	Penny Neuman
	Buckham Transport Ltd	Jason Hedges
	Buckham Transport Ltd	David Neilson
	Canadian Household Battery Association	Thomas McCubbin
	Canadian Institute for Environmental Law and Policy	Carolyn Webb
	Canadian Paint and Coatings Association	Jim Quick
	Canadian Plastics Industry Association	Cathy Cirko
Canadian Tire	Grant Caven	

Workshop/Webcast #1		
Involvement	Stakeholder	Name
	Canadian Tire	Sarah Webb
	Canadian Tire Corporation Limited	Joanne Rider
	Canadian Vehicle Manufacturers' Association	Yasmin Tarmohamed
	CCGD	Kim McKinnon
	CCSPA	Shannon Coombs
	CCSPA	Bruce Rebel
	CFIB	Plamen Petkov
	Chatham-Kent	Rick Kucera
	CHBA/RBRC	Bouchra Zeroval
	CHHMA	Vaughn Crofford
	City Of Barrie	Sandy Coulter
	City of Cornwall	Neil Dixon
	City of Greater Sudbury	Denise Bélanger
	City Of Greater Sudbury	Renee Lagrove
	City of Hamilton	Joanna Manganiello
	City of Kawartha Lakes	Bill Pickard
	City Of Kingston	John Giles
	City Of Kingston	John Rhodes
	City of London	Anne Boyd
	City of North Bay	Al Tomek
	City of Orillia	Greg Preston
	City of Ottawa	Jennifer Jackson
	City of Peterborough	Virginia Swinson
	City Of Sault Ste. Marie	Randall Roy
	City Of Thunder Bay	Vanessa Degiacomo
	City of Toronto	Lawson Oates
	Clarion Canada Inc.	Antonio Da Rosa
	Cloverdale Paint	Tim Vogel
	ConAgra Foods Inc.	Toni Di Fabio
	ConTech	Tom Maxwell
	Cooper Industries Canada	Brian Keane
	Corporate Policy Group LLP	Uzman Valiante
	Costco Wholesale	Ron Damiani
	Costco Wholesale Canada	Joelle Assaraf
	County of Brant	Marlie Gubbels
	County of Brant	Ed Sharp
	County of Peterborough	Sherry Arcaro
	County of Simcoe	Willma Bureau
	County of Simcoe	Tiina Nautras
	County of Simcoe	Sally Pridham
	County of Wellington	Cathy Wiebe
	Croplife Canada	Cam Davreux
	CropLife Canada	Irwin Schmidt
	DAP Products Inc	David Pratt
	DAP Products Inc	Ahmad Toullabi
	Detox Environmental Ltd.	Randy Duffy

Workshop/Webcast #1		
Involvement	Stakeholder	Name
	Dial Corporation / Dial Canada, Inc	Lizette Bonvin
	District Municipality Of Muskoka	Laurie Bissonette
	Drain-All Ltd.	Steve Tebworth
	E.R.I. Engine Rebuilders Inc.	Beverley Stratton
	Earthbound Environmental	Ken Friesen
	Éco Entreprises Québec	Mathieu Guillemette
	Electro Federation Canada	Wayne Edwards
	Electro-Federation Canada	John Bailie
	Elmer's Products	Grant Hunt
	Elmers Products Canada	Benit Mak
	Emerson Electric Canada Limited	William Gombos
	Emerson Tool Co.	Jim Hilliard
	Empack	Hadeel Al Neddaff
	Energizer Canada	Patrick Good
	Environment Canada	Duncan Bury
	Environment Canada	Raihan Butt
	Environment Haliburton	Eric Lilius
	Esscentual Brands Canada	Jim Mills
	Essex Windsor Solid Waste Authority	Cameron Wright
	Essex-Windsor Solid Waste Authority	Sue White
	Farrow & Ball	Lesley Mone
	Fluorescent Lamp Recyclers Inc.	Allyson Pick
	Fluorescent Lamp Recyclers Inc.	Dan Power
	Food & Consumer Products of Canada	Catherine Abel
	Ford Mo. Co. of Canada	Wyman Pattee
	Ford of Canada	Claire Pharand
	Fram Building Group	Colin Neharchand
	Gateway	Eric Gilbert
	Gerber Canada	Vinod Chouhan
	GlaxoSmithKline	Oliver Yeung
	Haldimand County	Nicole Mundy
	Halton Region	ShirleyMcLean
	Halton Region	Art Mercer
	HAYES LLC	Jerry Hayes
	HBC	Peter Skubna
	Hewlett Packard	Donna Chau
	Hewlett Packard	Courtney McLaughlin
	HMV Canada Inc.	Lori Marshall
	Home Depot	Michelle Adams
	Home Hardware Stores Limited	David Bois
	Honeywell	Megan Currie
	Hotz Environmental Services Inc.	Heng Lim
	Hotz Environmental Services Inc.	Pamela McAuley
	HP	Donna Chau
	Hruska & Associates	Joe Hruska
	ICI Canada	Lorraine Bennett
	ICI Paints	Harry Finkbone

Workshop/Webcast #1		
Involvement	Stakeholder	Name
	IKEA Canada	Jason Chambers
	Imperial Oil	George Vincent
	Jacques Whitford Limited	Kerrie Skillen
	John Deere Limited	Pat Winstanley
	K-G Packaging Inc.	David Pocock
	Kia Canada Inc.	John Luck
	Kleen Flo Tumbler Industries	Bharat Kawall
	Kleen-Flo	Chetan Patel
	Lake Ontario Waterkeeper	Laura Bowman
	Lee Valley Tools Ltd.	Janis Nichol
	Loxcren Flooring Group	Melissa Edney
	Manitoba Product Stewardship Corp	N Michael Fernandes
	Maple Farm Supply Limited	Steve Quackenbush
	Maple Leaf Foods Inc.	Beth Rhyno
	Mattel Canada	Don Strain
	Medical Pharmacies Gp Inc	Elaine Akers
	METRO	Stephen Cooper
	Metro	Mia-Pascale Marchand
	MGM McKenney	Mark Mckenney
	Mpsc	Mike Fernandes
	MPSC	Jim Fogg
	Mun. of Hastings Highlands	Mark Freymond
	Municipality Of Dutton/Dunwich	Kathy Crawford
	Municipality of Killarney	Faye de Lamorandiere
	Municipality Of Magnetawan	Ron Catcher
	Municipality Of West Perth	Barb Westlake-Power
	Mwin	Maryanne Hill
	NAPCOR	Michael Schedler
	NDMAC	Robert White
	NEMA	Mark Kohorst
	Newalta Corporation	Robert Redhead
	News America Marketing	Richard Barrett
	Newsweb Printing Corporation	Robert Brackett
	Niagara Region	Catherine Habermehl
	Niagara Region	Sherry Tait
	Niagara Region	Brad Whitelaw
	Norfolk County	Jennifer Wilson
	North Frontenac Township	Brenda Defosse
	Northwatch	Brennain Lloyd
	Nu-Gro	Malcolm Small
	Nutrite	Ken McLeod
	OABA Lawn & Garden Committee	Paul Lefebvre
	Ontario & Toronto Automobile Dealers Associations	Bill Davis
	Ontario Community Newspapers Association	Gordon Cameron
	Ottawa	Cameron Neale
	Ottawa Valley Waste Recovery Centre	Sue Campbell
	Ottawa Valley Waste Recovery Centre	Joseph Hall
	OWMA	Rob Cook

Workshop/Webcast #1		
Involvement	Stakeholder	Name
	Oxford County	Clayton Sampson
	Oxford County	Michelle Shannon
	P. Ravensbergen & Sons Ltd	William Ravensbergen
	Panasonic	Charles Monahan
	Panasonic Canada Inc.	Sean DeVries
	Peintures Recuperees du Quebec Inc.	Steve Blasiak
	Peintures récupérées du Québec inc.	Mario Clermont
	Pepsi Bottling Group	Neil Antymis
	Petro-Canada	Bill Hunter
	Pinnacle Foods Canada Corporation	Michelle Choudhri
	Policy Analyst	Colleen Brakewell
	Pollution Probe	Krista Friesen
	PPEC	John Mullinder
	PPG Architectural Coatings	Jerry Monteiro
	Procter & Gamble Inc	Anne McConnell
	Procter & Gamble Inc.	Karinne Chan
	Product Care	Mark Kurschner
	Quinte Waste Solutions	Jeanne Vilneff
	Quixtar Canada	Jay Turner
	Quixtar Canada Coproration	Robin Bell
	Radiator Specialty Company Of Canada	Sheryl Christensen
	RadioShack Corporation	Pat Loehr
	RadioShack Corporation	Jerry Stuart
	Rechargeable Battery Recycling Corporation	Susan Antler
	Reckitt Benckiser	Janet Wengler
	Recycling Council of Ontario	Jo-Anne St. Godard
	REG Consulting	Terri Goulding
	Region of Durham	Katherine Ross-Perron
	Region of Peel	Dwayne Cromwell
	Region of Peel	Dave Gordon
	Region of Peel	Grace McKenzie
	Region Of Waterloo	Shahin Virani
	Retail Council of Canada	Diane Brisebois
	Retail Council of Canada	Rachel Kagan
	S. C. Johnson and Son Limited	Chris McCurdy
	S. C. Johnson And Son, Ltd.	Stephen Rathlou
	SARRC	Phil Wrubleski
	Saxe Law Office	Jackie Campbell
	Scott Paper Limited	Misha Miladinovich
	Scotts Canada Ltd.	Valerie Bertrand
	Sears Canada Inc.	Karine Matthews
	Selectone Paints	Jeff Goodman
	Sheridan Nurseries	Rick Copley
	Shibely Righton	Megan Marrie
	Shoppers Drug Mart	Bob Baker
	Shoppers Drug Mart Inc.	Wallace Whalen
	Sico Inc.	Gary Sullivan
	Sierra Club of Canada	Rod Muir

Workshop/Webcast #1		
Involvement	Stakeholder	Name
	Smiths Detection	Robert Underhill
	SOGHU	Gilles Goddard
	Sony of Canada Ltd.	Nick Aubry
	Spectrum Brands Canada, Inc.	David Watson
	Sun-Brite	Ken Brown
	Suncor Energy Products Inc.	Karis D'Orio
	Sussex Strategy Group	Chris Benedetti
	Tabi International Corporation	Nancy Oliquino
	The Clorox Company Of Canada Ltd	Ian Chun
	The Gillette Company	Monica Roll
	The Rubber Association	Glenn Maidment
	The Sherwin-Williams Co.	Elizabeth Gilbert
	To The Point Communication	Margot Beverley
	Town of Aylmer	Bobbi Irwin
	Town Of Carleton Place	Dan Varcoe
	Town Of Espanola	Joel Yusko
	Town Of Fort Frances	Doug Brown
	Town Of Kirkland Lake	Mike Aldred
	Town Of Mississippi Mills	Chad Findlay
	Town Of Smiths Falls	Dean Buchanan
	Town Of The Blue Mountains	Jeffery Fletcher
	Township Of Central Frontenac	Judy Gray
	Township of Georgian Bluffs	Michael Day
	Township Of Hilliard	Janet Gore
	Township Of Montague	Murray Hackett
	Township Of North Stormont	Ginette Martin-Stephan
	Township of Papineau-Cameron	Treena Lepage
	Township of Rideau Lakes	Michael Touw
	Township Of Southgate	Dave Milliner
	Toyota Canada	Olson Or
	Toyota Canada Inc.	Mary-Anne Ferry
	T&T Supermarket Inc.	James Wong
	Ultima Foods Inc.	Bela Fecske
	Ultima Foods Inc.	George Tzogas
	Ultramar	Sonia Léonard
	UNICEF Canada	Azim Kassam
	Unilever Canada	Catherine McVitty
	Unilever Canada / Envirotech Associates	Henry Vens
	University Of Waterloo (With CHBC)	Murray Haight
	USANA Health Sciences	Tanya Quaestor
	VisionQuest Environmental Strategies Corp	Dave Douglas
	Wal-Mart Canada	Jennifer Barbazza
	Wal-Mart Canada Corp.	Andrew Horsman
	Waste Care Services Ltd	Jim Hallerin
	Waste Care Services Ltd	Martin Zimmer
	Waste Diversion Ontario	Nicole Lewis
	WDO	Glenda Gies
	West 49 Inc.	Carmen St.Marti
	Yellow Pages Group	Megan Wellington

Workshop/Webcast #1		
Involvement	Stakeholder	Name
	York Region	Laura Darnell
	York Region	Alec Scott
	York Region	Irina Udaltsova

Workshop/Webcast #2 Stakeholders

Workshop/Webcast 2		
Involvement	Stakeholder	Name
Submitted Comments	IKO Industries Ltd.	Nima Ebrahim
	Sheridan Nurseries	Rick Copley
	John Deere Limited	Pat Winstanley
	Drain-all Limited	Steve Tebworth
	Township of Russell	Ginette Trottier
	Kleen Flo Tumbler Ind. Ltd.	Chetan Patel
	Direct Sellers Association	Robin J. Bell
	Hudson's Bay Company	Peter Skubna
	Spectrum Brands Canada Inc	David Watson
	Quinte Waste Solutions	Jeanne Vilneff
	Raw Materials Company	Richard Unyi
	Scotts Canada Ltd.	Valerie Bertrand
	Cement Association of Canada	Teresa Sarkesian
	Region of Peel	Grace McKenzie
	Retail Council of Canada	Rachel Kagan
	(none)	Arlene Kapheim
	Scotts Canada Ltd.	Valerie Bertrand
	Hotz Environmental Services Inc.	Pamela McAuley
	EPSC	Jay Illingworth
Anonymous		
Crop Life Canada	Russel Hurst	
Participated in Workshop/Webcast	3M	Mark Jacob
	407 ETR Concession Co Ltd	John Trakalo
	Agrium Advanced Technologies	Malcolm Small
	Alberta Recycline	Richard Hewson
	AMO	Milena Avramovic
	AMRC	Vivian De Giovanni
	Association of Municipal Recycling Coordinators	Cynthia Hyland
	Bluewater Recycling Association	Francis Veilleux
	BOC Canada Limited	Salvador Funcion
	BOSCH	Jim Papadopoulos
	brand owner	Sheryl Christensen
	Brendar Environmental Inc.	Gordon Nijboer
	Brendar Environmental Inc.	Torin Macpherson
	Bruce Area Solid Waste Recycling	Vince Cascone
	Bruce Area Solid Waste Recycling	Karrie Drury
	C H B A	Tom McCubbin
	Campbell Strategies	Mitchell Toker

Workshop/Webcast 2		
Involvement	Stakeholder	Name
	Canada East Equipment Dealers Assoc.	Beverly Leavitt
	Canadian Consumer Specialty Products Association (CCSPA)	Shannon Coombs
	Canadian Household Battery Association	Susan Antler
	Canadian Paint and Coatings Assn	Jim Quick
	Canadian Plastics Industry Association	Cathy Cirko
	Canadian Plastics Industry Association	Fred Edgecombe
	Canadian Tire	Grant Caven
	Canadian Vehicle Manufacturers' Association	Yasmin Tarmohamed
	Cardinal Meat Specialists	Glenn Vaughan
	Carlisle Bay Co. Ltd.	Rob Jackson
	castrol	Siobhain Prabhu
	CCGD	Kim McKinnon
	CCTFA	CarlCarter
	CCTFA	Kathleen Ljubisic
	Cement Association of Canada	Teresa Sarkesian
	CFIB	Plamen Petkov
	CIELAP (Canadian Institute for Environmental Law and Policy)	Carolyn Webb
	City of Barrie	Tracy Quann-Strasser
	City of Cornwall	Neil Dixon
	City of Greater Sudbury	Denise Belanger
	City of Greater Sudbury	Renee Lagrove
	City of Hamilton	Joanna Manganiello
	City of Kenora	Marco Vogrig
	City of Kingston	John Rhodes
	City of London	Anne Boyd
	City of Ottawa	Cameron Neale
	City of Owen Sound	Chris Hughes
	City of Sault Ste. Marie	Randall Roy
	City of Timmins	Marcel Cardinal
	CM Consulting	Clarissa Morawski
	Cobalt Pharmaceuticals	Adam Bialczyk
	Compressed Gas Association	Anne Tardif
	ConAgra Foods	Toni Di Fabio
	Consumers' Association of Canada	Mel Fruitman
	Corel Corp	Scott McCullough
	costco	Brigida Cabral
	Costco Wholesale	Ron Damiani
	Costco Wholesale Canada Ltd	Pierre Dugas
	County of Peterborough	Gary Haylor
	County of Simcoe	Sally Pridham
	CPCA member for PPG Industries	Mike Koss
	DAP	Ahmad Toulabi
	Desjardins Financial Security	Marcus Mohammed
	DJA Environmental	Harvey Watson
	Drain-All Ltd.	Steve Tebworth
	Duracell	Bob McDonald

Workshop/Webcast 2		
Involvement	Stakeholder	Name
	earthbound environmental	Ken Friesen
	EcoSuperior Environmental Programs	Jim Bailey
	Electro-Federation Canada	John Bailie
	Electronics Product Stewardship Canada (EPSC)	Jay Illingworth
	Elmers Products Canada	Benit Mak
	Emerson Electric Canada Limited	William Gombos
	Empack	Gerry O. Chabrol
	Energizer Canada	Patrick Good
	Environment Canada	Raihan Butt
	Environmental Packaging International (EPI)	Paulette Vinette
	Envirotech Associates Ltd	Henry Vens
	essex windsor solid waste authority	Cameron wright
	FCPC	Catherine Abel
	Ficel Marketing Corp	Maly Gryschuk
	Fielding Chemical Technologies	Paul Haskins
	Fielding Chemical Technologies Inc.	Gillian Seagrave
	FLR	Dan Power
	Ford Motor Company of Canada Ltd.	Cassie Mayrand-Burney
	General Motors of Canada Ltd	Tammy Giroux
	Haldimand County	Nicole Mundy
	HALTON REGION	ART MERCER
	Hewlett-Packard	Donna Chau
	Hewlett-Packard	Frances Edmonds
	Hewlett-Packard	Brandon Seegmiller
	Home Hardware - Paint Division	Doug Thiemann
	Home Hardware Stores Limited	D Bois
	Honeywell	Sean McNear
	Honeywell Canada	Robin Forbes
	Honeywell, CPG	Megan Currie
	Hotz Environmental Services Inc.	Heng Lim
	Hotz Environmental Services Inc.	Pamela McAuley
	Hotz Environmental Services Inc.	Martin Hotz
	Hotz Environmental Services Inc.	Wally Kiczma
	Hruska & Associates	Joe Hruska
	Hudson\'s Bay Company	Peter Skubna
	ICI Canada	Susan Peterson
	ICI CANADA	LORRAINE BENNETT
	ICI Paints	Harry Finkbone
	ICI Paints	Jim Kantola
	IKO Industries Ltd.	Nima Ebrahim
	ITW Construction Products	Tim Dunning
	Jacques Whitford Limited	Kerrie Skillen
	Jacqueswhitford.com	Christine Roarke
	Jempak GK	Liliana Cretu
	John Deere Limited	Allan Hodges

Workshop/Webcast 2		
Involvement	Stakeholder	Name
	John Deere Limited	Pat Winstanley
	Kelleher Environmental	Maria Kelleher
	Kellogg Canada Inc	Keith Mussar
	K-G Packaging Inc.	Dave Pocock
	Kia Canada Inc.	John Luck
	Kleen Flo Tumbler Ind. Ltd.	Bharat Kawall
	Kleen flo tumbler Ind. Ltd.	Chetan Patel
	Lenovo Canada	Marsha Davenport
	Maple Farm Supply Limited	Steve Quackenbush
	McLaughlin Gormley King Company	Daniel Barringer
	McNeil Consumer Healthcare	Douglas Crane
	Medical Pharmacies Gp Inc	Elaine Akers
	Metro	Stephen Cooper
	metro	Mia marchand
	Ministry of the Environment	John Armiento
	Municipality of Chatham-Kent	Rick Kucera
	Municipality of Killarney	Faye de Lamorandiere
	Nalco Canada Co	George Giovinazzo
	Niagara Region	Sherri Tait
	Norfolk County	Jennifer Wilson
	Northwatch	Brennain Lloyd
	OABA Lawn & Garden Fertilizer Committee	Paul Lefebvre
	OACETT	Tyrone Gangoo
	Ontario Community Newspapers Association	Gordon Cameron
	Ottawa Valley Waste Recovery Centre	Elizabeth Graham
	Oxford County	Clayton Sampson
	panasonic	Sean devries
	Paris Southern Lights Inc.	Joan Henwood
	Peintures Récupérées du Québec	Mario Clermont
	PGAC & OPA	David Stainrod
	Plastit-Kote: Valspar	Vally D\'souza
	Pollution Probe	Krista Friesen
	Post-consumer Pharmaceutical Stewardship Association	Ginette Vanasse
	PPG Canada Inc.	Jerry Monteiro
	Procter & Gamble Inc	Karinne Chan
	Product Care	Frank O\'Rourke
	Quinte Waste Solutions	Jeanne Vilneff
	Quixtar Canada Corp	Jay Turner
	Quixtar Canada Corp.	Robin Bell
	Radio Systems	Debbi Logan
	Reckitt Benckiser	Jan Wengler
	Recochem Inc.	Angelo Macchia
	Recochem Inc./ CCSPA	Marina Kovrig
	Recycling Council of Ontario	Jo-Anne St. Godard
	REG Consulting	Terri Goulding
	Region of Durham	Katherine Ross-Perron

Workshop/Webcast 2		
Involvement	Stakeholder	Name
	Region of Peel	Dave Gordon
	Regional Municipality of Niagara	Brad Whitelaw
	Retail Council of Canada	Rachel Kagan
	Ryobi Technologies Canada Inc.	Sam Purdy
	S. C. Johnson and Son, Ltd.	Stephen Rathlou
	S.C. Johnson and Son, Ltd.	Chris McCurdy
	Safety-Kleen Canada Inc.	Usman Valiante
	Sales Consultant	Steve Blasiak
	Samsung Camera (Tegra Photo)	Stephanie Lee
	sara lee household and body care	Steve hahn
	SARRC	Phil Wrubleski
	Scott Paper Limited	Misha Miladinovich
	Scotts Canada Ltd.	Valerie Bertrand
	Sheridan Nurseries Ltd.	Rick Copley
	Sibley Righton	Megan Marrie
	Shoppers Drug Mart	Lilian Relph
	Shoppers Drug Mart Inc.	Wallace Whalen
	Shrader Canada Ltd.	Nancy Varga
	Sierra Club of Canada	Rod Muir
	Sony	Nick Aubry
	specialist	Mark Jacob
	Spectrum Brands Canada, Inc.	David Watson
	Sterling Truck	Roger Garnaitis
	Steward	Gary Sullivan
	Stewardship Ontario-MHSW	David Edge
	Summerhill Group	Sondra VanderVaart
	Suncor Energy Products Inc.	Les Wojtanowski
	Sussex Strategy Group	Chris Benedetti
	T&T Supermarket Inc.	James Wong
	The Clorox Company of Canada Ltd.	Ian Chun
	The E.R.I. Group	Beverley Stratton
	The Sherwin-Williams Company	Elizabeth Gilbert
	Town of Fort Frances	Doug Brown
	Town of Kirkland Lake	Mike Aldred
	Town of Mattawa	Marc Mathon
	Town of The Blue Mountains	Jeffery Fletcher
	Township of Georgian Bluffs	Michael Day
	Township of Hilliard	Janet Gore
	Township of Russell	Ginette Trottier
	Township of South Glengarry	Ewen MacDonald
	Township of Southgate	Dave Milliner
	Toyota Canada Inc.	Mary-Anne Ferry
	Ultramar Ltd	Marie-Eve Ouellet
	UNICEF Canada	Azim kassam
	University of Waterloo	Murray Haight
	VisionQuest Environmental Strategies Corp.	Dave Douglas

Workshop/Webcast 2		
Involvement	Stakeholder	Name
	Wal-Mart Canada Corp.	Diane Gibson
	Waste Diversion Ontario	Glenda Gies
	York Region	Laura Darnell
	York Region	Alec Scott
	York Region	Irina Udaltsova

Workshop/Webcast #3 Stakeholders

Workshop/Webcast 3*		
(* Includes comments made on the draft preliminary plan prior to, and following Workshop 3)		
Involvement	Stakeholder	Name
Submitted Comments	Worthington Cylinders of Canada Corp.	Mike Masse
	Oxford County	Clayton Sampson
	AMRC	Joe Hall
	AMRC	Vivian De Giovanni
	Niagara Region (2 submissions)	Sherri Tait
	Citizens' Network on Waste Management	John Jackson
	Consumers' Association of Canada	Mel Fruitman
	Pollution Probe	Krista Friesen
	Recycling Council of Ontario	Jo-Anne St. Godard
	Sierra Club of Canada (2 submissions)	Rod Muir
	Citizens for a Safe Environment	Karen Buck
	National Electrical Manufacturers Association	Mark A. Kohorst
	Emerson Tool Co.	Jim Hilliard
	Canadian household battery association	Susan Antler
	Peintures récupérées du Québec inc.	Mario Clermont
	Vulsay Industries Ltd.	Ross Quantz
	Energizer	Patrick Good
	Thunder Bay	Vanessa DeGiacomo
	Quinte Waste Solutions (2 submissions)	Jeanne Vilneff
	Direct Sellers Association	Robin Bell
Hotz Environmental	Pamela McAuley	
Raw Materials Company	Richard Unyi	
Procter & Gamble	Anne E. McConnell	
City of Hamilton	Colleen Brakewell	
Canadian Vehicle Manufacturers' Association	Yasmin Tarmohamed	
Canon Canada Inc.	Greg Davis	
Participated in Workshop/Webcast	Agrium Advanced Technologies	Malcolm Small
	AIAMC	Paul MacDonald
	Association of Municipal Recycling Coordinators	Cynthia Hyland
	Bioforce Canada Inc.	Monika Haefele
	Bluewater Recycling Association	Francis Veilleux
	Brendar Environmental Inc.	Brent Bolger
	Brendar Environmental Inc.	Gordon Nijboer
	Bruce Area Recycling	Vince Cascone

Workshop/Webcast 3*		
(* Includes comments made on the draft preliminary plan prior to, and following Workshop 3)		
Involvement	Stakeholder	Name
	Bruce Area Solid Waste Recycling	Karrie Drury
	Canadian Tire	Grant Caven
	Canadian Health food Association	Zamin fazal
	Canadian Household Battery Association	Susan Antler
	Canadian Tire	Sarah Webb
	Canadian Vehicle Manufacturers\ Association	Karen Hou
	Canadian Vehicle Manufacturers\ Association	Yasmin Tarmohamed
	Canon Canada Inc.	Greg Davis
	CCGD	Kim McKinnon
	CCSPA	Bruce Rebel
	CFIB	Plamen Petkov
	CHHMA	Jim Papadopoulos
	City of Barrie	Sandy Coulter
	City of Barrie	Chris O'Neill
	City of Cornwall	Neil Dixon
	City of Greater Sudbury	Renee Lagrove
	City of Hamilton	Colleen Brakewell
	City of Kingston	John Rhodes
	City of Orillia	Greg Preston
	City of Ottawa	Jennifer Jackson
	City of Peterborough	Virginia Swinson
	City of Sault Ste. Marie	Randall Roy
	Coleman	Adrian Schollen
	COLGATE PALMOLIVE CANADA INC.	STEVE MALLEY
	ConAgra Foods Inc	Toni Di Fabio
	Consultant	David Edge
	Consumers\ Association of Canada	Mel Fruitman
	Costco Wholesale	Ron Damiani
	County of Northumberland	Pam Russell
	County of Peterborough	Sophia Newman
	County of Simcoe	Sharon Beattie
	County of Simcoe	Willma Bureau
	County of Simcoe	Tiina nautras
	County of Simcoe	Sally pridham
	CPG LLP	Usman Valiante
	Durham Region	Katherine Ross-Perron
	earthbound environmental	Ken Friesen
	Emerson Electric Canada limited	William Gombos
	Emerson Tool Co.	Jim Hilliard
	Employee	B Mak
	Energizer Canada	Patrick Good
	Energizer Canada	Shari Kirkconnell
	Energizer Canada	Lori Beitz

Workshop/Webcast 3*		
(* Includes comments made on the draft preliminary plan prior to, and following Workshop 3)		
Involvement	Stakeholder	Name
	Environmental Packaging International	Paulette Vinette
	Filter Manufacturers Council	Richard Hubbell
	Food & Consumer Products of Canada	Catherine Abel
	Ford of Canada	Wyman Pattee
	General Motors of Canada Ltd	Tammy Giroux
	GNLD Int.	Shawn Platoonam
	Haldimand County	Nicole Mundy
	Halton Region	Brenda McCrea
	Hewlett Packard	Donna Chau
	Hewlett-Packard	Brandon Seegmiller
	Home Hardware Stores Limited	David Bois
	Honeywell	Sean McNear
	Honeywell, CPG	Megan Currie
	Hotz Environmenta	Wally Kiczma
	Hotz Environmental Services Inc.	Heng Lim
	Hotz Environmental Services Inc.	Andrew Lougheed
	Hotz Environmental Services Inc.	Pamela McAuley
	Hudson's Bay Company	Peter Skubna
	ICI Canada	Susan Peterson
	IKO Industries Ltd.	Nima Ebrahim
	Imperial Oil Limited	George Vincent
	Kao Brands Canada Inc.	Melinda Tan
	Kao Brands Canada Inc.	Barry Wood
	K-G Packaging Inc.	Dave Pocock
	Kia Canada Inc.	John Luck
	Laurentide Inc	Bob Martin
	MGM Management	Mark McKenney
	MOE	John Armiento
	Municipality of Chatham-Kent	Rick Kucera
	Municipality of Killarney	Faye de Lamorandiere
	Municipality of West Perth	Barb Westlake-Power
	Nature's Sunshine Products Canada	Spence Masson
	Niagara Region	Sherri Tait
	Norfolk County	Jennifer Wilson
	NUOMAC	Gilles Goddard
	Ontario Automotive Recyclers Association	Steve Fletcher
	Ontario Waste Management Association	Rob Cook
	Ottawa Valley Waste Recovery Centre	Joseph Hall
	Ottawa Valley Waste Recovery Centre	Sue Campbell
	Ottawa Valley Waste Recovery Centre	Elizabeth Graham
	Oxford County	Clayton Sampson
	Panasonic	Sean De Vries
	Pennzoil-Quaker State Canada Inc.	Mark Reed
	Pollution Probe	Krista Friesen
	Post-consumer Pharmaceutical Stewardship Association	Ginette Vanasse

Workshop/Webcast 3*		
(* Includes comments made on the draft preliminary plan prior to, and following Workshop 3)		
Involvement	Stakeholder	Name
	PPG Canada Inc.	Jerry Monteiro
	Procter & Gamble Inc	Anne McConnell
	Quinte Waste Solutions	Steve Dingman
	Quinte Waste Solutions	Jeanne Vilneff
	Quixtar Canada Corporation	Robin Bell
	Radiator Specialty Company of Canada	Richard Navin
	Recochem Inc.	Marina kovrig
	Recochem Inc.	Angelo Macchia
	Region of Peel	Grace McKenzie
	region of waterloo	Shahin virani
	Regional Municipality of Niagara	Brad Whitelaw
	Regulatory Affairs	Karinne Chan
	Retail Council of Canada	Rachel Kagan
	S. C. Johnson and Son, Limited	Chris McCurdy
	Sarnia Lambton Environmental Association	Dean Edwardson
	SARRC	Phil Wrubleski
	SHAKLEE	J WRIGHT
	Sheridan Nurseries Ltd.	Rick Copley
	Shoppers Drug Mart Inc.	Wallace Whalen
	Sico Inc.	Marianne Laforte
	Spectrum Brands Canada, Inc.	David Watson
	stakeholder	Martin hotz
	Steward	Gary Sullivan
	Sussex Strategy Group	Chris Benedetti
	The Blue Mountains	Jeffery Fletcher
	Town of Aylmer	Bobbi Irwin
	Town of Carleton Place	Dan Varcoe
	Town of Smiths Falls	Dean Buchanan
	Township of Algonquin Highlands	Brian Whetstone
	Township of Hilliard	Janet Gore
	Township of Russell	Ginette Trottier
	Township of Southgate	Dave Milliner
	Toyota Canada	Olson Or
	Bela Fecske	Ultima Foods Inc.
	USANA Health Sciences	Tanya Quaestor
	Wakefield Canada Inc.	Chad Cole
	Wal-Mart Canada Corp.	Diane Gibson
	Worthington Cylinders	Dan Brubaker
	Worthington Cylinders	Mike asse
		Lawrence Fox

Municipal Hazardous or Special Waste

Issue-Specific Comments

May 23, 2007

General Comments

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
Municipal Funding	In the case of MHSW mobile collection programs, costs to deliver collected materials from mobile collection sites to central transfer facility (including TDG certified driver, truck and fuel) should be eligible for at least some funding.	To be developed in negotiation with municipalities. If considered efficient, it would likely be considered an eligible cost.
	Plan should recognize eligibility of municipal transportation costs.	Plan recognizes and defines responsibilities of IFO for transportation of designated phase 1 materials.
	IFO should be obligated to negotiate with individual municipalities for the continuation of on site processing (bulking) and paid an agreed upon amount that recognizes the disposal cost avoidance.	To be addressed in negotiations.
	Capital funding must be provided for the establishment of container collection facilities since none exist currently.	Infrastructure for collecting and diverting containers will be addressed as per all designated materials.
	Local reuse of appropriate collected materials should be a fundable activity under the program.	Fee for service arrangements will be negotiated with municipalities.
	An increase in materials collected by municipalities will result in a significant increase in hauling costs. Will additional funding be made available to offset the increase in costs?	Transport costs will be the responsibility of the IFO. Municipal collection costs will be the responsibility of the municipality.
	Plan should be cautious in estimating post-collection costs based on current program operations. These costs are dependent on tendering and services currently rendered.	Plan is estimating costs for Year 1 based on current contract prices and data available, noting responsibilities will be different.
	Plan should outline standard tender components and evaluation criteria to ensure smooth transition of municipally handled contracts to IFO handled contracts.	Standard tender language is being developed through discussions between the Municipal MHSW Task Group and the MHSW Project Team. These will be available for the final plan but not likely for the April 10 version.
	Niagara Region has some concerns on how the capital funding will be administered for each Phase. Any capital invested during Phase 1 will be for the collection of both Phase 1 and Phase 2 as it is not economical to just build for the current need. Phase 2 capital funding should be made available for those MHSW Depots built under Phase 1.	Municipalities will continue to be responsible for the cost of collection activities for the full range of MHSW managed through municipal programs. In addition to covering post-collection costs, potential fees collected during Phase 1 of the program shall also consider capital costs to meet Phase 1 program accessibility targets.
	If municipalities need to build permanent MHSW Depot to better serve their residents before Phase 1 commences, then their should be provisions for retro payment in the plan for the capital spent on the Depots.	Success of implementation of the Year 1 accessibility Plan, which includes an increase in the number of collection events, will govern investments in permanent depots in subsequent years. Any capital investments by the IFO would have to be approved by the IFO once an approved program commences.
	Municipalities currently labpack collected MHSW materials according to MOE Waste Classes. These do not necessarily match the current Phase 1 material definitions. Municipalities will continue to collect materials that are defined in Phase I, those that do not meet the definition criteria in Phase I materials and those defined in Phase II. Given this situation, what is the proposed method for determining the percentage of post collection costs that will be the responsibility of Stewardship Ontario from mixed labpacks which do not match the material definitions; and whose responsibility will it be to make this determination? It is strongly	In those instances where Phase 1 and non-Phase 1 materials are packed together for transportation purposes, a cost allocation formula must be agreed to break out solvents and stains from flammable liquids. This may be done based on analyzing a combination of the AMRC composition study and the WDO Datacall and an analysis of additional samples to develop an allocation formula that is acceptable to both parties and meets the objective that fees reflect actual costs attributable to each material.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	recommended that this take place at the processing site under strict auditing controls.	
	A cost allocation formula will need to extend beyond solvents and flammables. It will need to differentiate not just between Phase 1 and Phase 2 materials, but also between materials covered under the Plan (per final definitions) and those that aren't. Accurate cost allocation must be based on 'real time' sampling of shipping containers (e.g., lab packs, etc.) as transported to service provider facilities.	Noted
	Will payments be based on our service provider invoice or manifest?	The transition from full municipal responsibility to shared responsibilities as it relates to contracting for collection, diversion and disposal services may be achieved in a number of ways. One of the options presented in section 5.1.1 of the Plan is the management and tendering of contracts by municipalities with reimbursement provided by Stewardship Ontario.
	What will happen if there is a discrepancy between what we think we should be paid and what we actually receive?	The IFO will verify manifests, invoices and contract arrangements and a provision has been included in the Year 1 budget for conducting audits of service providers and municipalities in situations in which the IFO is contracting with and reimbursing municipalities
	Will payments to municipalities be made on a quarterly or yearly basis, or per event?	This is not yet defined and will depend on the specific arrangements made with municipalities.
	Will fees be "billed" on a claim basis?	This is not yet defined and will depend on the specific arrangements made with municipalities.
	What options do existing municipal programs operating depots that not accept the full range of Phase 1 materials have?	Municipalities are not obligated under provincial regulations to provide MHSW services. Therefore, whether expanding services in municipalities currently providing MHSW services or introducing new services where no service exists, it is recognized that an agreement between the municipality and Stewardship Ontario will be required between the time the program plan is approved and program commencement.
	In addition to the bullet points listed: the Minister's letter includes "transportation of waste from collection facilities." Some programs transport materials from collection sites/depots to central depot for consolidation. Need an explicit statement on including this in the establishment of fees.	Where municipalities are requested to handle specific materials at a depot in a fashion other than lab-packing, consideration will be given to establishing a fee for this service to be paid to the municipality. Examples include Activities that reduce the cost of transportation, processing, recycling or disposal, as agreed between the municipality and Stewardship Ontario.
	Need to account for costs incurred by municipalities and other channels (e.g. take back) for 'program activities and costs related to participation in the MHSW program' – i.e., the cost of body(s) to cover non-collection costs for program support, information exchange, administrative.	The Minister's program request letter prescribes the IFO responsibility for costs after initial collection and these responsibilities are defined in Section 5.1 of the draft plan. It specifically includes P&E but not administrative and other support functions.
	Service providers have indicated that tracking Phase 1 materials is possible but at an increased costs, which will most likely be downloaded to municipal governments. Will this increased cost be included in the "post collection costs" which are being funded?	If the cost of post-collection activities increases as a result of requirements for tracking of Phase 1 materials, the IFO would cover these costs. This might include additional transportation and sorting by the service provider at its facility.
	Municipal funding should be sustainable indefinitely especially if municipalities will be increasing the number of events or building permanent collection depots. Niagara Region is	The plan is for five years.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	concerned that after a few years, there will be the same issues as BBPP and the move to a new funding model.	
	Caution should be exercised, especially with evaluation and award where it is the municipality that is served, regardless of who pays for disposal. Concern on both accounts relates to transparency and fairness of the process.	Noted
	Niagara's contract with MHSW depot provider expires August 2007, Region requires guidance in how to structure the next contract or if Stewardship Ontario will manage and tender the entire contract.	Noted
	QWS is recommending to its Board that, at the appropriate time, it negotiate with Stewardship Ontario for transportation, promotion and education and reuse cost compensation.	Noted
Accessibility	Accessibility should be further defined in terms of wait time(s) at events	Noted. Appropriate measures for accessibility will be developed.
	If a municipality declines to operate and cover the collection costs of a MHSW event deemed necessary to meeting accessibility targets, would the IFO operate the event instead? Would the IFO then be responsible for both collection and post-collection costs?	MHSW stewards' fees cannot cover collection. Progress in achieving the accessibility, collection and diversion targets will be monitored and the IFO will take appropriate action depending on that progress.
	Section 2.5.4 point 3) states that municipalities with depots will be encouraged and supported in making arrangements to extend their hours of operation where feasible. Please define "supported".	The IFO will be covering the post-collection costs resulting from these changes and for P&E and will work with specific municipalities to identify the potential benefits and feasibility of expanding hours of operation.
	Accessibility in rural areas can be increased through mobile collection depots and implementing MSHW depots at all landfill sites.	Will be considered in developing accessibility targets.
	Plan should elaborate on the implications of the voluntary nature of municipally-run depots and events.	Plan notes that municipal operation of return facilities is voluntary and that progress against targets will be monitored to identify whether alternatives are required.
	Doubling the number of events on a voluntary basis may be unrealistic. Will require increased staff and resources. Municipalities require advanced knowledge of funding availability and amount to make this possible.	Uptake of municipal events will be monitored and alternatives will be identified as necessary.
	Plan overstates uncertainty of continued municipal involvement in providing MSHW services.	This reference has been removed from the Plan.
	Plan should expand on strategy for addressing known accessibility gap.	Targets will be established for Year 1 and accessibility will be evaluated in conjunction with ongoing performance against targets.
	The Quinte program operates both events and depots all under municipal management and manpower. We would be interested in volunteering to be a study subject for the analysis of costs and contribution to targets events vs. depots.	Noted
	Quinte map is incorrect; it shows only the Bancroft depot. Quinte also has a Belleville depot, 12 off site event days, and 7 off site contract event days.	Noted for revised Draft.
	Some of the events/depot information provided in Appendix 1 is incorrect and should be verified.	Those programs whose event/depot information is incorrect should contact Stewardship Ontario with the correct information.
	The information provided in Appendix 1 only reflects those programs that report to the WDO	Those programs whose information is missing should contact Stewardship Ontario to provide an

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	Datacall. There are other programs that do not report through the datacall. These include Bruce County, United County of Leeds and Grenville, etc.	address for their depot/event.
	Has any thought been given to taking MHSW across municipal borders mitigating the accessibility criteria? For instance, residents in the outlying areas of Hamilton would be closer to Cambridge or Halton while residents of some areas of Haldimand-Norfolk would be closer to Hamilton.	If cost sharing arrangements could be established between municipalities this would be encouraged by the IFO. The IFO would cover the post-collection costs.
	Increasing our current depots' hours of operation is not a viable option, would event days be an option to increase our accessibility criteria?	Yes. Recognizing their voluntary participation, municipalities that currently provide events will be encouraged to double the number of events while programs without existing services will be encouraged to provide two events per year. These events will be sited to augment the access provided by any existing depots and the municipality's regularly scheduled events.
	If we offer an event day, will Stewardship Ontario dictate the hours or days of operation?	No. See answer above.
	It is not possible to "double" the program with anticipated disposal costs savings alone. QWS's Board nonetheless recognizes this as an opportunity to reinvest in the HHW Program to expand service toward meeting accessibility targets through the transferal of disposal cost savings.	Uptake of municipal events will be monitored and alternatives will be identified as necessary.
	Program expansion in Quinte will be dependent upon substantial capital investment from SO.	Municipalities will continue to be responsible for the cost of collection activities for the full range of MHSW managed through municipal programs. In addition to covering post-collection costs, potential fees collected during Phase 1 of the program shall also consider capital costs to meet Phase 1 program accessibility targets.
Tracking and Auditing	The plan should provide for audits of recycling facilities (actual and proposed – Ontario and elsewhere).	Options for verification and auditing of recycling facilities will be considered.
	Develop approved list of recycling facilities for service providers.	Will be considered in development of tracking and auditing system.
	Provide a clear definition of "recycler" and of "recycling". How will the acceptable recycling percentages or levels of recycling be determined?	The objective of the plan is to increase recycling beyond current levels. Definitions of recycling is available in Appendix 4 – Glossary of Terms of the Plan.
	Define "vendor" – would municipalities be included in this definition?	No. Vendor is the provider services generally for post-collection treatment of materials
	Plan should include parameters to determine acceptable re-use and for re-use tracking purposes.	Tracking system to be developed will cover local and other re-use activities.
	Municipalities request the establishment of a common approach and the formation of a working group that includes municipal representation to develop a mutually acceptable tracking tool.	Noted
	The "significant assumptions required by the Plan Development Team" should be explained so that proper tracking of Plan performance can be accomplished.	Assumptions and data sources are outlined in individual material specific plans.
Non-Municipal Collection Channels	Plan should recognize that municipalities are not the sole service providers.	Plan will encourage non-municipal schemes for collection of materials.
	Encourage industry take-back programs.	Industry take back programs will be encouraged under the plan but will not be mandated.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	Consider adding incentives for retail chains who take back their own materials as well as others.	Fees and incentives can only cover post-collection activities and are paid to service providers for transport and processing services.
	Promote small multiple collections at various sites; small bags/containers to be ordered by householders, materials mailed back or dropped off.	Options for increasing accessibility will be considered and evaluated during implementation.
	Take back to retail programs should be voluntary in nature (as opposed to mandatory).	Industry take back programs will be encouraged under the plan but will not be mandated.
	Decentralized collections systems are required to improve convenience; consider type of collection system used by Recycling Council of Ontario for their fluorescent light bulb program and Ottawa's retail take-it-back program	Plan will encourage non-municipal schemes for collection of materials.
	Plan should reference what ISP exists or may exist based on current steward activity.	Obligated stewards can apply to Waste Diversion Ontario have their materials managed through an ISP once there is an approved MHSW program plan. Stewardship Ontario is required to take into consideration any known plans to develop an ISP for obligated materials but to date no affected stewards have notified Stewardship Ontario of their intention to do so.
	Collection for used oil, filters and containers should be funded through an administratively simple Return Incentive Program that provides seamless, province-wide free-market access for all sectors. Incentive program should be similar to program in place in western Canada.	The plan proposes to introduce a hauler incentive program and, for containers, and possibly a processor incentive, based on the experience of the Canadian oil stewardship programs. The plan will assess and evaluate various methods and tools including incentives to help reach the various targets.
	Most IC&I sites are not registered as waste receivers and may therefore not be legally able to accept waste from the public.	Those designated materials that expect to be recovered in significant quantities through non-municipal channels are antifreeze, oil filters, and oil containers. The majority of service providers in all three sectors currently have arrangements for collection of their waste material.
	The Program Plan would be improved by referencing a greater level of effort to encourage industry take back programs and through industry sponsorship of collection events.	References to industry take back programs, such as those operating in the Ottawa region, will be included in the plan. Corporate sponsorship for local collection events is an individual company decision.
	For solvents, single use dry cell batteries, and paints and coatings, the plan must address a non-municipal channel budget equal to the effort to establish and utilize this type of outlet. A reasonable year cost would be \$100,000. For pressurized containers, an amount of \$200,000 should be allocated.	Budget has been included to address management of these materials through non-municipal channels
Targets	Proposed collection targets: 30% by 2008, 50% by 2009 and 75% by 2010.	Targets for collection included in plan.
	Plan should consider including a storage factor for setting collection targets.	It cannot be assumed that products stored in residences are waste, especially with respect to consumable products.
	Resident participation should be considered as basis for measuring program success.	This will be included as one of the performance measures to be established. Also, over the course of the five years, the evaluation mechanism built into the P&E strategic communication plan will examine and measure resident participation levels on a comparative basis.
	Plan should provide for regular review of targets to ensure progress.	Plan will provide for regular review of performance against targets. Also, over the course of the five years, the evaluation mechanism built into the P&E strategic communication plan will examine and measure progress toward targets on a comparative basis.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	Plan should explain methodology used to establish five year targets. Targets should be more ambitious.	Targets have been established based on existing infrastructure and capacity and will be adjusted depending on results of initial feasibility and planning work to be undertaken under the plan.
	There may be some take back programs operating in the community for items such as oil, oil filters, Fluorescent bulbs etc. Will the targets take into account these already existing take back programs? Will the municipality be penalized if they do not meet the targets with take back programs operating?	Existing take-back programs have been acknowledged in section 2.5.1 of the Plan. Collection targets have been set to include all channels (municipal and non-municipal), therefore accounting for existing and planned take-back programs.
	Why is diversion separate from collection under batteries? Need to present diversion targets for ALL materials in summary table (not just collection targets).	Table 2-5 presents both collection and diversion targets for all Phase 1 materials.
	MHSW collected under the program should be diverted to the highest end uses.	The plan addresses diversion principles by encouraging reduction, reuse and recycling activities.
	If plan includes materials collected at commercial vehicle service centres in setting generation and collection targets, it needs to indicate how service centres are to differentiate between "commercial activity" and "residential and SQG" sources.	Revised plan addresses scope of materials collected at automotive service centres.
	Registration of Stewards in this plan must be done as quickly as possible in order to gather and verify generator information and projections to determine the acceptability of collection and diversion targets.	Noted.
	It is troubling that there will be a reliance on disposal for the early "years" of the program without identifying the materials for which this statement applies.	The diversion targets for each material are presented in tables 2.7, 2.8 and 2.9
	Additional financial incentives should be built into the fees charged to stewards to promote the 3Rs.	The fee setting methodology will be reviewed in Year 2 of the program with consideration given to incorporating policy drivers to meet the objectives of the plan. Sufficient data required to support inclusion of appropriate policy drivers in the Year 1 fee setting is not available.
Reduction and toxicity	Plan must include measures (e.g. price signals) that result in reduction of MHSW and reformulation of MHSW to reduce toxicity.	The proposed fee setting methodology includes provision for a factor to modify fee rates within a material category to reflect differences in management costs.
	Material specific fees need to be specific enough to ensure that heavy premiums are paid on paint which cannot be recycled, batteries which contain mercury and other "specific" materials.	The proposed fee setting methodology includes provision for a factor to modify fee rates within a material category to reflect differences in management costs.
	Project Team should investigate Toxics Reduction Institute in Mass. US; this Institute is funded by industry and works to reduce toxics requiring management	Noted.
Regulatory Issues	Plan needs to specifically address the role of the MOE in amending facilities' CofA's.	Plan will note role of MOE in amending CofAs.
	Amending existing CofA's can be a difficult and time-consuming process, particularly when municipal collection facilities are located at landfill site.	Plan provides for work with MOE to establish options to amend CofAs.
	Ensure MHSW Plan does not conflict with Land Disposal Regulation.	Development of the MHSW has been closely monitored by the MOE in part to ensure that it conforms to all existing Ministry regulations.
	How will this material be transported across Ontario Roadways? Will the MOE permit this,	MHSW will be managed in compliance with the Ontario EPA and Regulation 347.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	ignore this, or grant exemption permits?	
	Is there a proposal to permit any of this?	MHSW will be managed in compliance with the Ontario EPA and Regulation 347.
	How will the materials be effectively tracked if no Hazardous Waste Manifests are used? What impact will this have on existing generators of these products?	MHSW will be managed in compliance with the Ontario EPA and Regulation 347.
	Will the manufacturers be expected to fund continuous materials generated?	This is not an MOE issue but should be addressed in the MHSW plan. "The MHSW plan is a 5 year plan. Fees levied on MHSW brand owners and first importers will be based on the quantities of the obligated materials sold in each year.."
	Are Certificate of Approvals required for anything?	MHSW managed under the plan will be managed in compliance with the Ontario EPA and Regulation 347.
	Will exemptions be allotted due to materials going for recycling?	MHSW managed under the plan will be directed to reuse and recycling where available and technically feasible. Costs to manage the Phase 1 MHSW materials through reuse and recycling is the responsibility of Stewardship Ontario and the obligated stewards.
Barriers to Diversion	Lack of legal requirement for municipalities to provide collection services should not be stated as barrier to diversion.	This statement has been removed from the Plan.
Plan revision	Plan should outline process for revision and updating when other materials are phased in.	The date for adding additional materials is unknown. The proposed fee setting methodology explicitly refers to the need for revision should Phase 1 materials be added to the program. Other plan changes, such as board governance, contracts with service providers, etc. will also need to change to accommodate the additional materials.
	There should be an ongoing mechanism to draw together affected and interested stakeholders to provide comment and direction on proposed changes to the plan. This group of stakeholders would include Stewardship Ontario, an MHSW steward, the WDO, a municipal stakeholder, public stakeholder and the MOE. This group would meet on a semi-annual basis to review and approve changes. The cost of this group would be covered through Stewardship Ontario as part of the annual fee setting methodology.	Any revision to the Plan that requires Ministerial approval would require consultation, during which stakeholders would have the opportunity to provide input and direction on the proposed changes.
Small Quantity Waste from IC&I businesses	A computerized tracking system to deal with ICI in particular should be developed and provided to municipalities at no cost.	A central reporting, verification and approval system may be required to verify the eligibility of businesses that deliver MHSW materials and that they are not returning quantities in excess of the regulations, possibly to various facilities. In the first year of the program, the requirement, feasibility and options for such a system will be investigated. One possibility is to extend the existing system for registering, reporting and remitting fees used by stewards, to cover IC&I businesses returning small quantities of MHSW.
	Plan should recognize difficulty for municipalities to track quantities delivered by SQG, especially when operating multiple mobile events.	See answer to comment above.
	Costing for small quantity generator with non "household products" small and remote municipalities not addressed in workshop	Small Quantity Generators addressed in section 2.3 of April 13 plan version. Accessibility, including small and remote areas, discussed in section 2.5
	The plan appears to overlap with O.Reg 347, which creates confusion on how to satisfy both the requirements of the MHSW plan and O.Reg 347 for those affected.	The Plan targets small quantity MHSW waste from IC&I businesses as waste being returned to an MHSW depot by a business that generates MHSW and is not required to submit a generator

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
		registration report with respect to the waste under subsection 18(1) of Regulation 347 under the EPA and that does not return more than 100 kg per month of MHSW through the program. Section 2.3 of the Plan goes into detail on the issue of Small Quantity Waste from IC&I Businesses.
	The program plan should include a consideration for IC&Is who currently have contracts for collection of materials designated under MHSW. Similar to municipalities, IC&I businesses will also require a transition period to address current contracts as changing contracts would incur additional costs which is not appropriate.	See answer to comment above. The IC&I businesses targeted by this program as those that return their waste to a MHSW depot. Businesses that currently have collection contracts in place will not be requested to put an end to these arrangements or to change these.
	Define "selected waste depot" used in section 2.3.2 for readers	A reference will be added to final draft.
	<ul style="list-style-type: none"> • Option 2: regional exemption not likely possible as it would increase disparity between regions. Material exemption has merit • Option 3 – also has merit – need to make options 2 and 3 part of R&D plan. • Option 4 – description is not clear : details should be provided on Reg. 347 changes that would allow diversion program implementation 	Noted
	Suggestion for ensuring system's integrity: verified generators list is sent to permitted receivers (take back programs and municipal partners)	Noted
	Allowing IC&I businesses will possibly increase wait times at HHW depots and increase costs due to increased quantity of materials to manage.	Noted
	In mid 2006 there were amendments proposed to 347 to exempt specific materials (e.g., paint, mercury containing items, batteries) from the need to obtain approvals, (site and transport C of A) and manifesting, if these materials were destined for recycling. The intent was to enable take-it-back type programs. The plan is silent on take back locations for paint and other materials that are receiving R&D efforts to promote the 3Rs.	The Plan indicates that during Year 1 industry will be encouraged to implement or expand take-back programs through private operators at the same time as encouraging the expansion of the number of municipal events and the hours of operation of municipal facilities. The specific details of these will be determined during Year 1.
	The issue/question remains on the fact that an IC&I generator may not know that a receiver is recycling a given material, and under the functional split proposed in the MHSW Plan, municipalities (i.e., receivers) may not be aware of whether the IFO (responsible for transportation and disposal) is sending the waste for recycling and disposal. Given this situation, efforts must be made to ensure that applicable regulations are being followed as intended by the MOE. The plan should attempt to define the grey areas and state the intent is to promote proper MHSW management through infrastructure development that is not at the expense of current service providers.	There is a requirement to establish a tracking and auditing system for materials from the point of collection to the final destination. The plan addresses and budgets for this in Year 1 as well as the development of vendor standards, that would address the treatment and recycling process.
Program start-up	Plan should explicitly state that Year 1 begins on the program commencement date as stipulated in Minister's program approval letter.	The program commencement date cannot be set until there is an approved program plan. The Minister may indicate the program commencement date but Section 30 (1) (c) of the Act specifies that the IFO must prescribe when fees are payable (the commencement date).

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	What is the anticipated date of obligation?	Although not confirmed, we do not expect the program to commence before January 2008.
	Date of commencement of program should be announced well in advance, program should not begin during retailer 'black out' periods from August to January (back to school and Holidays)	The commencement date is expected to be January 1, 2008.
	Will each of the program years (Yr 1, 2, 3, 4, 5) be a full 12 months?	Yes
	If Yr 1 does not start on January 1 st , will the program eventually move to calendar years?	Yes
Plan development timeline	Timeline for review of March 12 draft plan and providing comments was insufficient	Plan development timelines have been short for all stakeholders given the requirement to submit a final program plan to the Minister by May 31, 2007 and the requirements of WDO for consultation under their procedures for IFO.
Promotion and Education (P&E)	Suggestion of a \$/capita P&E allotment to municipalities for use in local promotion efforts, in addition to industry-funded province wide campaign.	A provision will be included in the draft MHSW plan to hold discussions with industry and municipalities regarding allocation on an appropriate basis.
	Year 1 efforts should focus on research and building system capacity before province-wide P&E campaign can be launched.	Agreed that this needs to be the case.
	All promotion and education materials should be standardized.	Stewardship Ontario will develop and test images and messages for effectiveness. These will be used in P&E materials developed by Stewardship Ontario and municipalities will be encouraged to adopt them in locally produced materials. This will help to build a universal campaign conveying similar information and themes province-wide.
	Will the P&E material contain unique municipal content or will it be province wide? If province wide, the uniqueness of individual programs that municipalities need to educate their residents about may be lost – e.g. for the blue box, an ad was placed in our local newspaper with a blue box. We don't use blue boxes and received many calls with regards to what is going on with our program.	The P&E materials that are produced to promote the program on a province-wide basis will focus on creating awareness but will suggest that Ontarians visit a website (to be created) to find out details that are specific to their municipality. Materials that are produced to promote the program on a local basis will take differences into consideration.
	Once the program is advertised to the public, what are those municipalities that do not have a program, but only event days (the case of most smaller municipalities in the north) to do? This will be especially problematic if retailers start to advertise that their materials can be taken to a HHW depot.	The P&E strategic plan will take into consideration issues such as accessibility.
	Use website, direct mailing, point of purchase advertisement.	The strategic communication plan included in the draft MHSW plan identifies a website as the core communication tool in providing Ontarians with access to MHSW information. The various communication vehicles used in the program rollout will "drive" people to the website for details.
	Plan should discuss industry's involvement and support of P&E campaign.	The draft MHSW P&E plan recommends the appointment of industry and municipal advisory committees to ensure both partners are able to participate fully in the P&E development process.
	Plan should reflect efforts to educate and promote proper disposal when 3Rs options do not exist.	A key objective the MHSW strategic communications plan will be to promote the "BUD" concept and to educate people on the importance of proper management of left over materials and containers.
Plan needs a new approach on how it manages local communications beyond "contingent" measures that are perceived as a punitive	The MHSW strategic communications plan recommends the development of key messages and images that would be made available to	

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	approach to managing the P&E work.	municipalities. This will help to ensure the universality of a cohesive, province-wide message.
	Material specific P&E options include local municipal P&E such as waste collection calendars: municipalities do not normally have the funds to provide specific information on ways to reduce, reuse or recycle individual materials. The message would have to be general and encompassing all materials.	The MHSW strategic communications plan recommends the appointment of a municipal advisory committee. It is proposed that discussions with these municipal representatives would include how P&E promotion can best work in municipal P&E programs.
	P&E program should include information on non-toxic alternatives.	The full range of messaging that needs to be developed in order to meet the goals and objectives of the program will be developed in discussion with industry and municipal representatives upon approval of the plan.
	Funding should be allocated to those who develop P&E material promoting alternatives to MHSW.	The question of allocating funding support to municipalities will be included for discussion when this topic is discussed with the municipal and industry advisory committees.
	Greater effort needs to be taken to address the specific materials targeted in Phase 1 of the program, specifically for solvents, fertilizers and pesticides	Noted
	The P&E program may cause concerns for some municipalities that decide to double events as collection of non-Phase 1 materials will increase.	Municipal representatives will be encouraged to participate in the development of the MHSW strategic communication plan to address the concerns raised.
Research & Development	This section would benefit by the addition of criteria that assess proposed improvement to collection and diversion	Noted
	While the Plan relies on a functional split, R&D investments into collection efficiency and effectiveness is welcome	Noted
	Program must include investment into 3Rs markets infrastructure and capacity	R&D investment expenditures have been noted under each of the material specific plans and are reflected in the overall program budget.
	Stewardship Ontario should consider opportunities to make collection and transportation of MHSW more efficient.	The Addendum to the MHSW Program request letter makes provision for "Research and development activities to support and increase the effectiveness and efficiency of municipal hazardous or special waste and diversion." R&D projects to achieve these objectives will be considered by Stewardship Ontario.
Program Awareness	Communications regarding the program should be developed collaboratively with SO to ensure consistency and appropriateness of message, definitions, etc.	The P&E program is being developed by Stewardship Ontario and will include input from both industry and municipalities. Systems will be put into place to ensure that messages, language, etc. will be consistent and appropriate.
	Need a plan to capture all potentially obligated stewards and inform them of the MHSW regulation and plan development process	Noted
Rules for Stewards with Respect to Payment of Fees	Question on whether fees can be passed on to customers at point of purchase	The program will require fees from the obligated brandowners and first importers. The program does not govern the application of fees at retail.
	Plan should be silent on the transparency of environmental levies, RCC wants "on the tape" option to be available.	The program will require fees from the obligated brandowners and first importers. The program does not govern the application of fees at retail. The Rules contain reference to remitter which allow the retailer the remit on behalf of the obligated steward.
	Will fees be weight-based or unit-based?	The fees will be unit and/or volume based.
	Will fees be collected at the retail level?	The program will require fees from the obligated brandowners and first importers. The program does not govern the application of fees at retail.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	The plan should acknowledge the potential need for sectors to develop sector based calculators to estimate their contribution or any other mechanism to reduce the burden on brand owners who are not the significant contributors in this segment.	Stewardship Ontario has not been directed to develop calculators. This is something you may want to formally request with Stewardship Ontario.
	What will be the first reporting year?	The reporting period has not been decided yet.
	What will be frequency of reporting?	Payment and reporting schedule will be quarterly.
	Program should allow retailers to pay fees based on sales of behalf of brand owners	The program will require fees from the obligated brandowners and first importers. The program does not govern the application of fees at retail. The Rules contain reference to remitter which allow the retailer the remit on behalf of the obligated steward.
	MHSW Program Rules should allow retailers not otherwise obligated to register as voluntary steward	This is a counter opinion to other comments received and has been noted.
	Remitter definition is different than the definition for a designated steward. Allowing another steward to file a steward report and pay fees on behalf of another steward does not seem to be consistent with existing Stewardship Ontario Rules for voluntary stewards under the BBPP.	Remitter definition has been revised and it is different than Voluntary Steward.
Containers	Already paying for solvent containers (aerosols, pharmaceuticals) under BBPP, seeking confirmation will not be obligated for these under MHSW.	It is our intention to continue to have empty "containers" managed through the Blue Box program. Fees for most packaging, including solvent containers, will continue to be paid through the BBPP. Exceptions may include oil containers (which are specifically named in the Minister's letter).
	Are empty containers obligated under the program or only containers with material remaining in them?	See answer to comment above.
	<ul style="list-style-type: none"> • Recycling options for paint and coatings containers • Difficulty to recycle solvent containers • Difficulty to recycle pesticide and herbicide containers • Difficulty to recycle antifreeze containers • Handling options for used oil containers 	The Minister's letter requires the plan to encourage and to promote, reduction, reuse, and recycling activities. It is recognized that current recycling options may not be available or may be available on a very limited basis and that challenges exist to recycling some of the containers. Investment in R&D and incentive schemes may be necessary to help develop technologies and to increase recycling capacity to allow for a shift to recycling options.
	QWS's recycling program collects empty antifreeze containers as High Density plastic in residential blue box program and from the IC&I sector. We also recycle empty containers from HHW antifreeze bulking program.	Noted
	Correct the reference to oil containers as these are not an exception and are actually part of many MHSW municipal programs as a residual by-product of bulking waste oil.	Noted. The reference is to highlight that all oil and pressurized containers are designated, while for other containers, only those used to deliver the MHSW are designated.
	Containers for anti-freeze and solvents should receive the same level of attention than oil containers receive in the program plan.	Development of recycling options for oil containers has proven to be technically feasible in other jurisdictions and estimates of related research and development costs were provided by the affected stewards. Investigation of practical options and R&D costs for developing options for the recycling of anti-freeze and solvent containers will be considered further in Year 2 of the program.
Edits and Minor Additions	Section 4.1.1 Transition of Municipal Contracts - second bullet point should read "the municipality" not "a municipality".	This change has been made.

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	Plan should reference the AMRC's HHW committee work and involvement in establishing effective and efficient programs	An acknowledgement has been included in the cover letter to the WDO accompanying the plan.
	Correct paragraph 2 of section 2.5.1 to the following: "Municipal programs have existed since the late 1980's. A number of municipal programs were implemented in the late 1980's, with many coming on stream in the early 1990's".	This change has been made
	Indicate that postal codes are also checked to track source generation (where materials are coming from).	This addition has been made
	On page 46, note that lithium batteries (in particular lithium button cells) pose the biggest overheating risk due to short circuits, leading to leakage and explosions.	This addition has been made
	On page 46, provide the following rationale for a vendor qualification process: for the service provider, the stewards, SO, and the MOE, to collectively meet health, safety and environment obligations.	This addition has been made
	On page 15, table 2-3, the current management practice for batteries is listed as "mainly landfilled". The following line should be added: "Very limited recycling, with processing quality uncertain".	This addition has been made.
	On page 16, the second paragraph omits batteries as having limited recycling options. Batteries should be inserted into the list.	This addition has been made.
	On page 48, the EU directive date was 2006 (not 2004).	This correction has been made.
	Page 18 of the plan indicates that most Phase 1 materials have 3Rs management options except for antifreeze containers and single use dry cell batteries. However, subsequent sections of the draft plan indicate that these products can be recycled. Clarify the apparent contradiction.	The text on page 18 is meant to indicate that there is very little recycling capacity at the moment for those two materials. Subsequent sections outline known recycling processes for these materials. For example, in the case of dry cell single use batteries, only one recycling processor exists in the province, however, the technology to recycle this material has been in place for some time.
	It should be noted that it is not a barrier when a municipal depot does not collect MHSW or certain types of waste anymore than when a steward or retailer does not take it back. The true barrier to increased solvent diversion is the limited definition and lack of take back locations.	This wording has been removed.
Service Providers	Are out of province service providers (e.g. Miller Environmental in Winnipeg) being considered within the program?	Yes. Service providers located in neighboring provinces are being considered.
Program Obligation	The CVMA and its members already have processes in place for many of the designated materials and therefore should be exempt from the MHSW program.	Obligated individual brand owners and/or first importers who wish to take direct responsibility for managing their obligations under the WDA can apply to the WDO for approval of an Industry Stewardship Plan (ISP) once there is an approved MHSW program plan. Stewardship Ontario is required to take into consideration any known plans to develop an ISP for obligated materials but to date no affected stewards have notified Stewardship Ontario of their intention to do so.
	Responsibility of brand owner for items consumed by commercial entities.	The Plan targets residential waste and small quantity waste from ICI&I businesses only.
	Request for a de minimis similar to BBPP.	There is no de minimis proposal in the programme plan at this time.
Harmonization	Materials covered in the MHSW program plan should be consistent across Canada (in particular	Designated material definitions have been aligned with those in place in existing programs in other

Issue	Comment(s)/Question(s)	Action(s) on Comment(s)/Question(s)
	with British Columbia, the Canadian standard)	Canadian jurisdictions.
	Need to ensure program is harmonized	Designated material definitions have been aligned with those in place in existing programs in other Canadian jurisdictions.
Fees	The methodology used to establish the relationship between the weight-based and unit-based fees must be more transparent to make the correlation between the two fees more obvious	The conversion factors have been included where appropriate in the tables in Section 5 of the Plan.
	Clarification regarding which fees applies, and how to apply the fee (to the container only, to the contents, to contents and container, for example) is necessary.	The units for each fee rate have been clearly defined in the fee rate tables and the rules.
	Fees should be based on size ranges (e.g. oil filters in Quebec, flammables in BC)	The fee rate units have addressed the range of input received from each industry sector.
	Importance of streamlining the draft MHSW program fees with those of existing programs and simplifying the fee schedule in the interest of efficiency and practicality.	The fee rate units have addressed the range of input received from each industry sector and the requirements of the Waste Diversion Act and the Minister's program request letter.
Program Cost	Common costs appear to be for a stand alone program with no attempt to share resources with the other approved program in Ontario. This is counter intuitive and shocking given the critical assessment municipalities have received over the years for being autonomous. Given that municipalities have changed their approach and have become more flexible with an ability to share resources, so should this program.	Administration costs have been shared between MHSW and Blue Box stewards. While MHSW program specific costs have been developed as separate costs from those of the Blue Box Program Plan, this represents a conservative estimate and cost sharing opportunities will be investigated during start-up and implementation.
	Costs for P&E and research and development (R&D) should be related to collection, diversion and accessibility targets and must not be \$0.00 at any time. For materials that show zero planned spending, it sends the wrong message – that there is no intent to having this plan succeed.	Costs estimates have been included where appropriate. In those cases where there is no basis on which to estimate costs, a dash has been included indicating estimates will be developed as required as information becomes available in the future.
	Table 5-4: Table references MOE Compliance: The plan should explain what is to be enforced and the penalties associated with any infractions along with the process of fining and prosecution if needed.	The purpose has been included under Table 5-4 and penalties associated with contraventions of the WDA are outlined under section 41(1) and 41 (3) of the WDA.
	Stewardship Ontario should consider reimbursing costs incurred by municipal representatives in supporting development of the MHSW program plan.	This request was considered by the Stewardship Ontario Board and rejected given that company and association representatives have also incurred significant program development costs that will not be reimbursed by Stewardship Ontario.

Material-Specific Comments

Material	Comments/Questions	Actions
Paints and Coatings	Definition is unclear, may need to itemize inclusion/exclusion list	Definition, inclusions and exclusions clarified in section 3.3.1
	Current baseline conditions unclear	Current baseline conditions were clarified in section 3.2.3 of the April 13 version
	Request for more details on how existing infrastructure could accommodate more volumes of MSHW collected.	Increased frequency of pickup from collection locations will allow current collection infrastructure to accommodate more volume. Processing service providers suggest that capacity for most materials currently exist. Processing incentives may be required to ensure additional processing and recycling capacity becomes available.
	Request to facilitate option of sending paint for recycling to facilities in Quebec.	Consideration will be given to all processors.

Material	Comments/Questions	Actions
	Alternative management options for the treatment of material that cannot be recycled are not financially viable due to market price matrix.	R&D and incentive schemes may be required to help develop or increase end market capacity.
	Are aerosol paints included in the definition?	Aerosol paints are included in the definition of paint. The Plan's paint and coatings definition has been adjusted accordingly.
	Are transparent wood sealants (eg. Thompsons Water Seal) captured in Phase I under Paints and Coatings?	Yes
	Will paint in containers other than the original container (eg. coffee cans, glass jars, margarine tubs) qualify for funding?	Yes. The cost to manage any container for any MHSW that is delivered to a municipal depot or event is part of the program costs covered by the plan.
	Clarification needed regarding what paints and coatings are included in the pesticides category.	Paints that meet the pesticide definition (registered under the PCPA and subject to pesticide labeling requirements) are excluded from the paint category but are captured under the pesticide category. This has been made explicit in the paint definition.
	Page 16, recycling options for paint and coatings: "latex paint in concrete and cement" should read "latex paint in concrete" since cement is a powder-like ingredient in concrete and can't be painted or coated.	Latex paint can be used as an additive in the manufacturing process of Portland cement.
	Alternative management options: solidified product may not be easily identified and separated from non-solidified (potentially recyclable) product.	The point of determination of whether paint can be recycled or if it is a solid and requires alternative management options is typically done at the processor's facility where the quality control is managed.
	Does the term architectural coatings include specialty paint for items other than walls and trim?	The definition for paint is intended to include paints beyond wall and trim paint such as stains, deck coatings, stain blockers, floor paints, mildew resistant paints, melamine, 2 part paints, bathroom and kitchen paint, etc.
	Driveway and roof coatings should not be excluded. At a minimum, provide rationale for their exclusion.	The excluded products are bitumen based "tars", which are not recyclable with other paint products.
	Add retail take back as option for increasing quantity of material collected.	Industry take back programs will be encouraged under the plan but will not be mandated.
	The following should be added to Reduction options: product packaging and pricing must encourage consumers to buy appropriate quantities rather than more than is needed. "Buy what you need, use what you buy" is not sufficient when it's less expensive to buy in volume.	Comments will be referred to industry.
	Reuse: Need to resolve issues with Health Canada paint regulation (legality of paint reuse programs); need to recognize reuse options at some collection events are limited.	Program will encourage additional reuse programs, within the regulatory and other limitations.
	Add the following opportunity to increase diversion: sell paint in quantities needed and investigate standardization of paint containers packaging.	The "BUD" philosophy is intended to encourage purchasers to buy the quantity needed.
	Paints & coatings sold in Ontario should be required to be recyclable.	The majority of paints sold in Ontario are recyclable if they are stored properly. Specially formulated paints and industrial paints pose challenges to recycling as a result of the chemical composition.
	Will there be incentives available to retailers for taking back paint, and for doing reverse distribution with the left over paint collected at their facilities?	The program will not pay for collection costs, however transportation incentives are a possibility.
	Will there be capital funding to help develop a permanent drop-off point network with	Under section 5(f) of the Minister's letter, the plan must consider capital cost to meet Phase 1 program

Material	Comments/Questions	Actions
	municipalities and retailers?	accessibility targets.
	R&D should be added to the communications plan as it relates to "take back" programs.	Noted
	Hotz Environmental would like to make the project team aware that it recycles oil base/alkyd paints and sells the products as paint products.	Noted
	QWS is recommending to its Board that, following the commencement of the program, the Paint Bulking Program be discontinued.	It is expected that the program team will meet with every municipal program to discuss transitional issues, including the possible discontinuation of on site paint bulking in order to render the collected paint suitable for reprocessing. The timing of this will depend on the contractual limitations each municipality may face, and the readiness of the MHSW program to direct the paint for reprocessing.
	Are automotive paints and primers included? Municipalities currently receive this paint type and to encourage the IC&I access for the small automotive paint shops and hobbyists, this type of paint must be included in Phase 1.	The paint products included in the program are architectural products, which does not include automotive products.
	The plan should include opportunities to buy paint in different volumes which will require a modification of how paint is sold i.e. sell what is needed by blending exact amounts.	The product sizes currently available reflect industry's perception of consumer needs. Paint is sold to consumers already packaged, subject to tint being added. New container sizes are being tried, such as the 1/2 gallon. The shifting of the entire industry from a prepackaged to an unpackaged marketing approach is not practical.
	Make paint available at retail locations in addition to depots and events as they do now for "miss tints".	Many paint retailers will sell miss tints, however that is their own product and they have confidence in the quality and safety of the product. It is unlikely that paint retailers will want to offer for sale other brands of used paint, however there are other options that will be explored such as used building material stores.
	Identify the recycling options that exist for those plastic containers that do not lack a recycling option.	In other programs the containers are used in plastic recycling, depending on type of plastic. Options include flaked plastic for general plastic recycling, and plastic lumber.
	Opportunities (2 nd bullet): change to "establish retail collection system".	The current wording is "investigating return to retail..." is appropriate at the planning stage.
Solvents	Profiles of current baseline conditions unclear	Current baseline conditions were clarified in section 3.3.3 of the April 13 version
	Options presented for reducing the amount of solvents available for collection (reduction) unclear	reduction options clarified in section 3.3.5 of the April 13 version
	Options presented for increasing quantities of available solvents that is collected unclear	Current Infrastructure, Quantities, Accessibility and Targets clarified in section 2.5 of the April 13 version
	Options presented for increasing the amount of collected solvents that is reused or recycled unclear	reuse and recycling options presented in section 3.3.5 of the April 13 version
	Solvents as defined are generally collected in municipal HHW programs as 263A (Flammable Organics). Many other materials which do not meet the definition criteria are also collected in this category. Can municipalities assume that current collection practices will continue (263A) and that labpack composition studies will be routinely conducted to determine the percentage of materials that meet the criteria in order to determine post collection funding?	In those instances where Phase 1 and non-Phase 1 materials are packed together for transportation purposes, a cost allocation formula must be agreed to break out solvents and stains from flammable liquids. This may be done based on analyzing a combination of the AMRC composition study and the WDO Datacall and an analysis of additional samples to develop an allocation formula that is acceptable to both parties and meets the objective that fees reflect actual costs attributable to each material.
	Definition is overly technical and it would not be possible for a service provider to identify the	Noted

Material	Comments/Questions	Actions
	solvents by these criteria at an HHW event. It is our hope that either a "product name" listing or a more simplified definition will be produced.	
	Clear parameters from recyclers are required to determine if waste solvent will be eligible for recycling (e.g. solid content, mixed solvent criteria and ingredients).	Some R&D has been proposed in Year 2 to assess management practices around solvents in an attempt to allow for recovery and recycling of collected solvents.
	Definition is too narrow, which has resulted in a very high unit cost, which will increase the product consumer price unnecessarily. This can be avoided by having those solvent stewards that are currently excluded come forward and volunteer to be part of the plan and not wait for a program request letter.	Noted. Estimates of generation and recovery and the associated costs also have been revised.
	The plan should confirm that solvents sold in containers up to 20 litres are included even though a very limited amount is sold.	This clarification has been made in section 3.3.2
	No management options have been provided for reduction.	P&E reduction options have been provided in section 3.3.5
	Make reuse available at local retailer in addition to depots and events.	Noted, but there are significant labeling and liability challenges associated with re-use of these materials in the retail environment.
	Add "working with Take Back locations" under Research and Development.	The areas of focus for initial R&D have been revised and are included in the material profiles. R&D investments will be reviewed and revised as necessary based on the results of Year 1 activities.
Oil filters	The plan should not be limited to after market parts only. The use of after market parts implies replacement of original part, which will require disposal. Moreover, it will be impossible to differentiate aftermarket oil filters from original parts.	The definition covers aftermarket filters as obligated products (subject to fees), however the program will manage all used filters whether OEM or aftermarket as it is impossible to differentiate between the two. The exclusion of OEM filters from fees is based on experience in other programs that it is administratively difficult to determine the origin and destination of new vehicles.
	All filters from the ICI&I businesses are handled as per O.Reg 347. Section 3.4.4 should be rewritten to appropriately capture the difference between material handled in the ICI&I sector versus the DIY sector. As written, the reader may interpret that the ICI sector is only diverting a portion of their filters and needs an incentive to come into compliance.	Section 3.4.4 states that most of the 12,446 automobile service provider outlets in Ontario collect oil filters from vehicles serviced, but that not all accept oil filters from DIYs. The stated diversion rate through the automobile service sector of 38% is for both DIYs and DIFMs.
	Oil filters in Qc cost \$0.50/filter < 8 inches and \$1.00 for filters > 8 inches; Ontario MHSW program proposes \$0.604 per car or \$0.868 per kg of filter. Fees should be harmonized across provinces.	Fee rates have been revised.
	Oil filter value under "Other Collection" is more representative of a diversion rate than a collection rate. ICI businesses collect 100% of oil filters, and most oil filter changes occur in the DIFM market, hence 38 % collection rate is overly low.	Estimates are based on best available data, including those from industry sources. Estimates will be revised as necessary when additional data becomes available in Year 1.
	Cost per unit of oil filters is identified as 60.4 cents in table 3-9 and 50 cents in table 5-15. Which is it? Is this the calculated cost as required under Ontario's Waste Diversion Act? If it is the Ontario calculated cost, is it simply a coincidence that it is the same rate for this product as in other Canadian provinces?	Fee rates have been revised and made consistent throughout the plan document. Fee rates are the sum of the estimated management cost in municipal and non-municipal channels, the estimated investments required in year 1 for R&D and P&E and the share of the common costs.
	The definition conflicts with Appendix A definition. 3.4 Oil Filter definition includes the filter in the program (excludes them from steward fees) and Appendix A excludes original parts oil filters from	Original oil filters are now included.

Material	Comments/Questions	Actions
	the plan. Due to the logistics, they must be included in the plan.	
	Promotion and Education: Add stickers applied to filter or packaging at point of sale displaying information on how to manage used filters.	Noted
	P&E costs seem out of proportion to proposed activities in 3.4.7. Specifically, the last two bullets in 3.4.7 are already being done. What are the costs associated with the first three bullets in 3.4.7?	Noted. Costs have been reviewed by industry sectors.
Oil containers	Current baseline conditions unclear	Current baseline conditions clarified in section 3.5.3 of April 13 plan version
	We are not currently aware of a competitive technology available for processing oil containers.	While the recycling infrastructure is not developed in Ontario, oil container recycling technology does exist and recycling is done in other provincial jurisdictions. R&D and incentive schemes may be required to increase recycling capacity.
	Plan should provide rationale for exclusion of containers for brake fluid, penetrating oil, hydraulic jack oil, 3 in 1, aerosol propelled lubricant, gun oil and sewing machine oil.	The definition of oil containers is consistent with similar programs in other provincial jurisdictions and is intended to capture lubricating motor oil products. These containers are similar in nature and this allows for ease of recycling.
	Industry should be aware that large volumes of oil containers are generated at MHSW depots due to waste oil being delivered in the packaging it was originally sold in and emptied when it is bulked into drums/holding tanks.	It is recognized that some oil containers will end up in the MHSW depots. The proposed transportation incentive will apply regardless of where the empty containers are collected.
	Annual 2% growth vehicles sales are not accounted for in assumptions used to establish quantities available for collection.	Vehicle sales growth is expected to be offset by reduced consumption due to lengthening service intervals.
	Plan should elaborate on 3Rs management options available for oil containers.	The industry is anticipating reduced oil container generation in future years due to fewer oil changes required by automobile manufacturers and greater acceptance of consumers of bulk oil through the DIFM market.
	Why are fees for oil containers in MHSW program (\$0.81/kg) six times higher than under BBPP (\$0.13556/kg)?	The fees for oil containers under the Blue Box Program are calculated by applying the blue box fee rate for the kind of plastic used, and do not vary by actual product application. Because of oil contamination, very few blue box programs accept oil containers. The MHSW fee rate reflects the cost of a targeted program for oil containers.
	The definition is designed to be consistent with other provincial programs and does not relate to Ontario program experiences. It is recommended that the plan should include most if not all of these containers as they are specifically excluded in specifications for blue box program end markets or, alternatively, it is recommended that the Minister specifically include the "excluded list" in the next program request letter.	The containers on the exclusion list reflect a small volume of specialty products manufactured by a large number of first sellers. Adding these products at this time would make the program administratively cumbersome and cost ineffective.
	Promotion and Education: Add a sticker to the container as part of the education tool kit.	"On product" stickers are being considered for many products, but may not be suitable or cost effective for products such as oil containers. Other provincial programs have tried the aftermarket "sticker" and/or "shelf-talkers" approach and have found them to be costly, labour intensive and to provide limited results.
	Targets: Source of data on oil containers is unknown; clarify what municipal data was used to calculate the 204 tonnes of oil containers.	As indicated, due to the lack of available data, estimates are required. The 204 tonne figure includes an estimate of 101 tonnes through the service provider channel, derived from the 2004 OUOMA plan, and 103 tonnes from the municipal

Material	Comments/Questions	Actions
		sector. The latter is an estimate of the fraction of used oil containers being managed from the number of containers brought to depots by consumers, based on 2,670 tonnes of used oil reported in the WDO's datacall.
Single Use Dry Cell Batteries	Key elements of a single use battery MHWS plan, as discussed by industry stakeholders, should be more clearly highlighted in the Plan document.	Concerning Point C – Communication and Promotion, the MHSW P&E strategic plan recommends appointing an industry advisory committee that will be convened upon approval of the plan to help map out appropriate messages, images and language. Concerning the other points, comments from industry have been incorporated into draft plan
	Please clarify what is the "WEE" program, and what batteries would be exempted under this program.	WEEE refers to Waste Electronic and Electrical Equipment. WEEE was designated by a regulation made under the Waste Diversion Act in late 2004. Batteries likely to be included in the program are those that are not easily replaced by the user as part of regular use of the product and the products and lamps that are built into monitors, TVs.
	Need for education of public regarding safe storage and delivery of batteries to HHW program collections.	Consumer education on the safe handling and storage of batteries will be included in P&E handouts and on the website.
	A good portion of the alkaline batteries collected in Ontario are collected through our Battery pail program that captures 40 - 50 pounds per 2.5 gallon plastic pail. RMC has developed additional processing capabilities to accommodate increased volumes, and has completed R&D relating to battery component recovery.	Information on the program has been added to the draft plan.
	The battery industry's proposed 1 - 2 year R&D and information gathering phase is unjustified. A great majority of these issues have been considered during RMC's R&D and has not been released to all parties based on proprietary information	Noted
	The plan's battery diversion targets are too low. Diversion targets should be similar to what is proposed for the other 7 materials. Batteries are articles and a lot easier to collect and recover than liquids such as paints, solvents, antifreeze and pesticides.	Noted
	Add retail take-back and mail back options to options for increasing collection	Section 3.6.8 discusses Non-residential Collection Options, including return to retail and mail back options.
	Definition of "recycling" should include only processes that recycle 100% of the batteries. This option is available at Inmetco in the USA.	According to industry sources, the complexity of the various battery chemistries makes it very difficult to recycle 100% of batteries. We cannot verify if Inmetco recycles 100% of all incoming batteries they process.
	Definition should explicitly exclude batteries typically handled by a technician (i.e. coin batteries on circuit boards). Definition should only include batteries that are intended to be replaced easily and regularly by the user.	The program covers easy to remove batteries and is not intended to address those installed inside products where the battery is included as an integral part of the product.
	Provide reference for estimated average weight of 30 grams.	This information was provided by the Canadian Household Battery Association
	Since there is no legal ban on mercury-containing batteries in Ontario, it is possible that mercuric oxide batteries containing 40-60% mercury may be sold and present in the waste stream, in addition to counterfeit or other mercury-containing	Noted.

Material	Comments/Questions	Actions
	batteries. This has significant cost implications for recycling.	
	The 250 tonne estimate for current collection likely includes rechargeables, etc. and is therefore inflated.	This figure has been adjusted down to 204 tonnes based on the AMRC waste composition study to account for the removal of rechargeable secondary batteries collected in this mixed stream.
	It is inappropriate to say that consumer education could focus on applications where rechargeable batteries might be more appropriate.	This has been reworded to: "Education could focus on informing consumers on the most appropriate applications for primary batteries".
	Page 47, R&D: the first paragraph should not read "industry raises concerns about existing processing...". It should be all of us concerned.	This has been reworded to: "The initial assessment from the battery industry raises concerns about existing processing capabilities in relation to environmental standards".
	On page 13, under R&D and market development, one of the bullet points states stewards must pay for "capital funding, if required, to assist with the development of appropriate processing infrastructure for diversion..." We do not believe it is either acceptable, or contemplated in the Minister's letter, that stewards be obligated to cover the cost of setting up recycling infrastructure. This sentence should be reworded, or stricken from the document.	In her Program Request Letter, the Minister of the Environment indicated that fees collected during Phase 1 of the program shall be used to pay for program activities after the initial collection of waste at the MHSW or other collection facilities. Examples of appropriate activities include: transportation of waste from collection facilities, processing, recycling and disposal of waste, and other related waste management activities; and promotional and public education activities. Capital funding (direct or indirectly through fee for service arrangements with service providers) will be provided, if required, to assist with the development of appropriate processing infrastructure for diversion.
	Similarly on Page 68, program budget, second bullet, it is inappropriate to include capital costs for meeting accessibility targets.	The Minister's Program Request Letter indicated that potential fees collected during Phase 1 of the program shall also consider capital costs to meet Phase 1 accessibility targets.
	In that same paragraph but in the bullets, "one single use dry cell battery recycler" is listed. Please clarify that we have no data to confirm there is a qualified processor that would meet agreed health, safety and environment standards.	The following caveat has been added in section 3.6.6: Industry representatives have stressed that existing processors of batteries have not yet undergone full vendor qualification assessments.
	On page 17, the "available for collection" figure is incorrect. This figure should be somewhat less than the sales figure due to the hoarding effect.	The "available for collection" figure has been revised to 4,940 tonnes.
	Clarify the basis for targets: In Europe, it is: weight collected, as a percent of weight sold; where weight sold is the average sales in that year and the preceding two years.	An explanation on the methodology used to measure the collection rate is provided in section 3.6.4. The same methodology as the one used in Europe will be applied.
	Since weight sold does NOT equal weight available for collection, table 2-4 should be revised to specify the current estimated collection % is calculated based on weight sold, not on weight available for collection.	Table 2-4 has been revised accordingly.
	On page 20, the chart lists the performance target for batteries. We disagree with the targets presented. In addition to being speculative, there are enormous differences between the European and Canadian markets.	Revised 5-year targets are presented in Table 2-5.
	The 25% collection target is wrongly rationalized on Page 48, where it states 25% is the EU 4 year target (2012), implying it's a reasonable Ontario 5 year target (2012). The Draft preliminary plan fails to point out that the EU target is actually only conceivable because collection and recycling programs commenced in Europe in 1991. Moreover, Europe has economy of scale that	The 5 year collection target has been revised to 10% (with 5% diversion).

Material	Comments/Questions	Actions
	Ontario does not have.	
	The 25% - 75% diversion target is confusing. Did the draft plan mean to say "recycle" or "recovered" target?	This reference has been removed.
	The figure 75% is obtained by adding the steel, zinc, and manganese dioxide constituents. The oxygen associated with the manganese metal should not be part of this sum	Section 3.6.9 has been reworded as follows: Generally, if steel is the only material that is recycled from the battery processor, then the recycling rate has an upper limit of approximately 25%. If steel, zinc and manganese can be also captured and utilized for other beneficial uses, a maximum recycling rate of 50% can potentially be achieved.
	Ontario 5 year target cannot be set until more investigation into the available and necessary recovery infrastructure and consumer habits is done.	For Years 1 and 2 of the program, the plan will be to conduct research and development specific to primary batteries in the following key areas: Primary research on used primary battery profile; End of use processing; Assessment of other collection opportunities.
	The following would be a reasonable 5 year target: that the up to ~5% currently collected, be more fully recyclable by 2012; that the process be transparently qualified, that the fate of all materials including Hg, Zn, Mn is known; and that R&D programs are directed toward development of more than one qualified vendor, capable of recycling more than 25% of the battery.	Revised 5 year targets are presented in Table 2-5.
	On page 46, boxes and bags may not be the safest collection vehicles. Consumers should not be encouraged to store or mix used batteries. Similarly, the plan should not be speculating on "may be possible to return batteries to retail".	The following caveat has been added to section 3.6.6: Homeowners need to know which batteries contain mercury and should be separated from those that do not. The following caveat has been added to the possibility of a return to retail system: "...however mixing primary batteries with other batteries such as rechargeable batteries in existing collection systems will pose handling problems. It may also pose potential safety issues as mixed batteries may have electrical charges and may leak. Counterfeit batteries may explode rather than leak, and contain mercury.
	Collection and diversion targets are truly not acceptable notwithstanding our support of the program plan in general. This group of stewards must make a concerted effort to be seriously involved or be told what the targets are going to be.	The 5-year collection and diversion target for single use dry cell batteries have been revised to 25% and 13% respectively.
	Research and Development: Given the extended comments on EU experience and the multitude of global markets, limiting collection until processing options are in place is not acceptable. This is a primary reason why the plan must adopt incentives to promote the 3Rs and establish policies to encourage 3Rs and to be enforced if needed.	Noted.
	Promotion and Education: Add stickers as an education tool and taping the ends of batteries to prevent electrical discharges.	Noted.
	P&E should include a budget line which could set at \$200,000 for year 1.	P&E expenditures have been revised.
Antifreeze	Definition unclear: is it strictly automotive antifreeze?	Yes
	The Antifreeze Exclusion List should not be limited to only Ethylene or propylene glycol for specific use of vehicle engine coolants. Many	Noted. The material definitions have been reviewed by industry and by the MOE.

Material	Comments/Questions	Actions
	other antifreeze products (such as those listed in the exclusions) are used as antifreezes.	
	Windshield washer antifreeze should be included in this category as the volume is significant and a recycling technology exists.	Noted. The material definitions have been reviewed by industry and by the MOE.
	Non recyclable antifreeze is not sent to landfill but rather for wastewater treatment.	It is recognized that antifreeze is not sent to landfill.
	Clarify whether 4.8 million litres/5,160 tonnes is an annual generation number.	The data represents an estimate of annual generation volume for the DIY market.
	How was the number of vehicles for which DIY flush and fill servicing is performed determined?	It was determined using available industry data on the number of vehicles operating in Ontario, frequency of servicing, and percentage of owners who are DIY.
	Clarify whether the 50% 5-year target refers to annual baseline generation (5,160 tonnes) or to total generated over five years.	The 50% 5-yr target refers to annual baseline generation.
	The generation volume for antifreeze (42 million litres) is erroneous. The sales in the Canadian market place are aprox. 30 million litres of concentrated product. Assuming Ontario consumes 40% of this, 12 million litres of concentrate or 24 million litres of ready to use product are generated.	The generation volume is based on best available data and industry input. More accurate data will be obtained once the program commences and stewards report their sales volumes.
	Need a method in place to ensure that national producers outside Ontario will face the same fees as Ontario producers, so as to keep Ontario producers competitive.	Section 5(a) of the Minister's letter defines stewards as brand-owners and/or first importers into Ontario. The program recognizes stewards' need for a fair playing field and will have systems and tools, such as audits, in place to ensure a fair playing field.
	Your goal of reducing the quantity of antifreeze available for collection will be easy to meet because your baseline is inflated. In reality, this market has been declining for several years and will continue to decline as more vehicles are leaving the assembly line with long life antifreeze in their system.	The inherent reduction due to motor technology improvements and increased service intervals is recognized in the plan. Reducing the quantity of antifreeze available for collection may also be achieved through other means, including the promotion of the BUD rule "buy what you need, use what you buy", proper storage for reuse, and retailer advice.
	While you may receive applause from some areas, in truth this program will not generate very much revenues and will not likely result in greater material collection then the industry currently enjoys.	Although it is recognized that there is currently a system in place for the antifreeze from DIFM sector, the need for improving collection and diversion of antifreeze from the DIY sector must be addressed.
	Please clarify the rationale for the new approach of targeting "packaged antifreeze" only.	The focus on prepackaged product is expected to cover all antifreeze packaging and waste antifreeze from all DIY and small quantity ICI waste generation.
	Will there be compensation for the bulking of antifreeze based on avoided labpack disposal costs?	Where municipalities are requested to handle specific materials at a depot in a fashion other than lab-packing, consideration will be given to establishing a fee for this service to be paid to the municipality. Examples include bulking of antifreeze for which the municipality would receive payment on the basis of a set fee per drum.
	The plan should continue to target the DIY market as there are processes in place for diversion of antifreeze in the Do-It-For-Me market.	The plan's focus on prepackaged product is expected to cover all antifreeze packaging and waste antifreeze from all DIY and small quantity ICI waste generation.
	The 16% collection rate seems more representative of a diversion rate, rather than a collection rate.	The MHSW program is targeting prepackaged antifreeze, which is used by DIY (do-it-yourself) consumers as well as service centres.-The collection rate for the DIY segment of the marketplace is considered to be very low.
Pressurized Containers	More explanation of the 'return outlet system' is required (how does it work, is it an exchange	The largest quantity of refillable pressurized containers collected for re-certification and recycling

Material	Comments/Questions	Actions
	program only, can any 20 lb tank be returned regardless of condition, is there a limit on the number, will partially full tanks and outdated tanks be accepted?)	is through the exchange programs propane distributors have established with non-municipal channels such as retail stores (e.g. Canadian Tire, Home Depot) and automotive and propane distributors (e.g. Petro Canada, Esso, Pioneer Gas, Sunoco, etc.) across Ontario. The number of collection locations is not accurately known, but it is estimated at close to 1,000 establishments.
	It is not feasible to evacuate the propane from NR cylinders at the point of collection. It is our understanding that the MOE does not promote the venting or emitting of propane into the atmosphere. Also, a proper mechanical device is required by the MOL for the puncturing of these cylinders to prevent any potential injury to attendants.	While nothing exists at this time, the plan includes R&D funds to revisit the technological and environmental feasibility.
	More promotion of the return outlet system is required so that 20 lb tanks can be removed from the municipal collection system.	Noted
	The industry profiles are defined differently than the proposed definition, therefore it does not seem to be an equitable comparison.	Noted
	Many of the cylinders included in this current definition do not fall under the typical MHSW classification of waste. Many of these cylinders require "ERAP" to transport as required by TDGA and therefore it would be impossible to transport these from a mobile or single day event.	As part of the R&D activities, opportunities for evacuating non-refillable containers at the point of collection in order to eliminate the TDG handling requirements will be investigated.
	Examine collection techniques used by Parks Ontario for propane tanks	Information on the Ontario Parks collection system has been added to section 3.8.3
	TDG Regulations are not necessarily a barrier to recycling.	Noted
	Industry should be moving towards refilling options for the single use containers.	Will be forwarded to industry
	Single use containers should be taken out of the municipal and Parks collection streams for return to point of sale, possibly under a deposit/return system.	Noted
	If evacuation of non-refillable containers at the point of collection is being researched to eliminate TDG handling requirements, stewards should be aware that this activity would not be undertaken at municipal collection points without full compensation for equipment, staff training, health and safety, building, fire code and insurance upgrades and staff time.	Noted
	Industry should only produce refillable containers. Failing that, the recycling option has merit if the container were evacuated, but given the unknown nature of what is involved, do not expect a collection agent, park or picnic ground staff to undertake this activity. Finally, if the industry is successful in implementing an easy evacuation system by the consumer and the container is collected in the blue box program i.e. recycling; is the product (material) exempt from the MHSW plan and defaulted into the Blue Box Program Plan?	Noted. If these containers were to be handled in the Blue Box, some review of the Blue Box plan and MHSW plan would likely be required.
Fertilizers	The reported quantity of fertilizers and pesticides collected through municipal channels (834 tonnes) in the Feb. 14 version of the plan is questionable	Pesticide and Fertilizer quantities collected through municipal channels have been revised.
	Compost and reformulation are not valid	Revised fertilizer reduction options are presented in

Material	Comments/Questions	Actions
	reduction options for fertilizers	section 3.9.5 of the April 13 plan
	Does "weed and feed" material fall under the fertilizer or pesticide category?	Weed and feed products are captured under the Fertilizer definition. They are registered under the Fertilizers Act.
	How will "Non-Hazardous" and "Hazardous" fertilizers be defined to determine which landfill they should be sent to?	For the purposes of this plan, fertilizers are defined as those that are registered under the Fertilizers Act. These fertilizers will be managed according to Reg. 347 requirements.
	Definition would be clearer is specified that only products with a Fertilizers Act registration number are included.	Definition includes products with a registration number.
	How will the quantity of fertilizers captured under the definition be determined?	The quantity of fertilizers that meet the Plan's definition that is captured will be reported yearly by municipalities that collect this material.
	While the development of recycling opportunities for empty plastic fertilizer containers is listed under R&D and Investments, the MHSW Team should know that fertilizer bags and plastic containers (clean only) are currently being collected as part of QWS's blue box curbside program	Noted
	It is noted that there are possible exclusions but not definitive exclusions. The wording must be clarified to be clear on what is in and what is out. Further, compost produced by private and municipal operations that may or may not make N-P-K claims must be exempt. The stated intent of the plan in to exclude compost; this must be written and documented in the definition.	Appendix A of the Rules now reflects exclusions and ambiguity du to the use of "possible" language has been removed.
	Add another option of compost as fertilizers without pesticides may be added to compost mixtures subject to the producers' requirements.	Added as an option that will be investigated in Year 1.
Pesticides	Municipal bylaws and reformulation are not valid reduction options for pesticides; proper use, cultural practice, and "buy what you need" are more suitable alternatives	Revised pesticide reduction options are presented in section 3.10.5 of the April 13 plan
	How will "Non-Hazardous" and "Hazardous" pesticides be defined to determine which landfill they should be sent to?	Pesticides in the program are those meeting the labeling requirements outlined in the definition. These pesticides will be managed according to Reg. 347 requirements.
	Relying on pesticide generation and collection data from British Colombia is misleading. Although in the long run, a relationship may be established between quantities sold in a given year and quantities collected in that same year, caution should be exercised in applying such assumptions to Ontario programs. Even 'mature' HHW municipal programs receive pesticides that are 20, 30, 50 years old.	Generation and collection data will be refined over time using the Ontario data that becomes available. In lieu of generation data for Ontario, it was necessary to use B.C. data. Collection data are based on an annual survey of Ontario municipalities.
	Provide rationale for exclusion of algacides.	If they are registered under the PCPA, but do not meet the labeling requirements outlined in the definition, they would be excluded.
	Pool Chemicals that are excluded needs clarification.	If they are registered under the PCPA, but do not meet the labeling requirements outlined in the definition, they would be excluded.
	State whether pesticides contained in aerosol packaging are included	Pesticides in aerosol containers are included. This has been stated explicitly in the pesticide definition.
	Need a product definition for pesticides that is consistent with the national Pest Control Products Act to ensure consistency across the country.	The definition includes products that are registered under the Pest Control Products Act, but also includes additional labeling requirements.
	Clarification needed regarding what Paints and Coatings are included in the Pesticides category	Paints that meet the pesticide definition (registered under the PCPA and subject to pesticide labeling

Material	Comments/Questions	Actions
		requirements) are excluded from the paint category but are captured under the pesticide category. This has been made explicit in the pesticide definition.
	Program should only focus on pesticides destined for domestic use – commercial and industrial pesticides are already covered by Crop Life stewardship programs.	The pesticide definition has been modified to only include domestic pesticides.
	Definition needs to accommodate older products that may not conform to labelling specifications under the definition. These products are still being collected by programs that have operated since the early 1990's.	Definitions are more related to assessing what products are obligated under the program and therefore need to refer to current labeling and classifications
	The wording in the definition is confusing. Is the symbol referred to in the definition only the skull and crossbones OR is it any one of the other six symbols referenced in Schedule 3 of the <i>Pest Control Products Act</i> ? The skull and crossbones often appears on pesticide product labels inside the caution inverted triangle yet the definition appears to limit products included in the MHSW Plan definition to the danger octagon and warning diamond. If defined products are to be limited to just the skull and crossbones symbol inside the octagon or diamond, this appears to be a very small group of products. What about pesticide products that display the explosive or flammable symbols? These would have been captured by the Quick Translator in the AMRC Study.	The Quick Translator in the AMRC study was used as a guide in determining the quantity of reported pesticides that would meet the definition.
	It is difficult to comment on the municipal channel costs for pesticides without understanding the range of pesticides products that are captured by the definition, but this number seems low given the very high unit cost to manage pesticides.	Noted.
	Consideration needs to be given to allocating sufficient funds to offset the high cost of managing those pesticides that won't be caught by the definition. These are the older products that may not conform to PCPA labeling requirements as specified in the definition. Clearly these products would be captured if sold currently, and while some of the older more established HHW programs may have cleared many of these items from the system, jurisdictions with infrequent or no HHW collection opportunities may find a substantially higher proportion of these items in their pesticide stream. At an average cost of close to \$200 per lab pack, these programs could find management costs staggeringly high.	Costs between municipalities and Stewardship Ontario will need to be allocated in instances where Phase 1 and non-Phase 1 materials are typically handled together. Consideration will need to be given to how these types of products should be handled.
Phase materials	2 Seeking definition for pharmaceuticals.	We will address Phase 2 material definition when the Minister requests a plan for Phase 2.
	Have Phase 2 stewards participated in the current plan development process?	All stewards, Phase 1 and others, have been encouraged to participate in the current plan development process.
	Sharps and pharmaceuticals should be directed away from municipal programs to industry-run take back programs.	Will be addressed in Phase 2.

Issues to be passed onto the Ministry of the Environment

Provide tax credits to Ontario facilities that recycle Phase 1 and Phase 2 materials
Consider reducing the maximum monthly quantity allowed from small quantity waste from IC&I businesses from 100kg to 25kg
How was the 100kg/month IC&I limit established? How will this be implemented? Will the MOE not require Generator Registration?
Is this a proposed Universal Waste Rule type system?
How will cross border provinces be monitored?
Will this tie into the HWIN programs?
MOE has a role to educate IC&I about their waste management responsibilities as it relates to hazardous or special wastes.
Phase 2 materials need to be added to the program as soon as possible after the Minister's approval of the Plan. This will simplify collection and sorting issues.
Phase 2 should include everything that was not included in Phase 1 (ballasts, acids, corrosives, adhesives, oxidizers, etc.)
Given that the plastic specifications for end markets typically state antifreeze and solvent containers are "out throws" along with oil containers, the Minister could require that these containers receive the same attention as oil containers and that they be included in the next program request letter or sooner, since the system and stewards are now in place.

Issues to be passed onto Transport Canada

Streamline the issuance of Equivalent Level of Safety permit so that processors are not subject to Transportation of Dangerous Goods Act requirements
