



September 8, 2017

M. Nicolas Juneau,
Directeur, Direction des matières résiduelles, Ministère du Développement durable
de l'Environnement et de la Lutte contre les changements climatiques
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RE: Règlement modifiant le Règlement sur la récupération et la valorisation de produits par les entreprises, Gazette Officielle du Québec, 12 juillet 2017, 149^e année, n° 28

Cher M. Juneau,

The Canadian Association of Recycling Industries (CARI) is an industry association made up of over 250 member companies in the recycling sector. Our members range from small family scrap yards to massive capital-intensive processing plants that process, broker, and consume recyclable commodities. These members are engaged in the recycling of all commodities, but the majority deal primarily or exclusively in metals. CARI is a national association, but we represent more than 20 companies operating within Quebec.

As the voice of the Canadian recycling industry, CARI would like to submit the following suggestions to amend the Regulation respecting the recovery and reclamation of products by enterprises (Quebec Recycling Regulation), published by le ministre du développement durable, de l'environnement et de la lutte contre les changements climatiques (MDDELCC) in the July 12, 2017 Gazette Officielle du Québec.

CARI supports the fundamental purpose of this proposal: ensuring the proper removal and management of pollutants and reducing greenhouse gas emissions. However, we believe the issues raised in the Regulation are already largely being addressed, and that imposing additional regulations would be unnecessarily costly and burdensome. We encourage further assessment before moving forward with these regulations.

CARI strongly believes that any provincial recovery program should not interfere with existing market-based systems. Quebec currently has a thriving market-driven system in place to collect and process major appliances. In fact, these products are already being highly recycled across Canada. The



2014 Study on the Operations and Effectiveness of the Major Appliances Collection and Recycling System in British Columbia identified the collection rate of these products at 95%, which is on par with other studies from across North America. CARI believes the proposed regulation would inhibit basic market competition, which could result in some recycling facilities being forced to leave the industry.

CARI members are further concerned that the Regulation as proposed will add a considerable administrative burden to their businesses. Collecting, record-keeping, and reporting of information requires additional labour cost and time, and some smaller yards would not be able to afford the necessary manpower. Furthermore, the existing *Regulation Respecting Halocarbons* mandates all recovered halocarbons be returned to halocarbon suppliers or wholesalers, and requires those suppliers to report the amount of halocarbons recovered to the Minister each year. We therefore believe the reporting requirements of the Regulation respecting the recovery and reclamation of products by enterprises are redundant.

CARI members strive for the safe and environmentally responsible processing of all recovered materials. Major appliances are currently being efficiently recycled at a high rate. The existing *Regulation Respecting Halocarbons* prohibits venting these chemicals into the atmosphere, and mandates reporting their recovery. In addition, appliance manufacturers have begun eliminating halocarbons from their products. This new Regulation would therefore be a costly and redundant program that will do little to improve the recycling rate of these products or the management of halocarbons.

We appreciate your taking the time to address our concerns.

Tracy Shaw
President & CEO