



Thanks for having me today.

As background, I am D. Trevor Barton, Executive Director of the Municipal Waste Association effective June 1, 2017 after a 30 year municipal waste management career and I am testifying today about Household Hazardous Waste management in the Province of Ontario, Canada:

Ontario has had producer responsibility legislation for household hazardous waste (e.g., paint/solvents, pesticides, antifreeze, oil filters/containers, fertilizers, gas cylinders and batteries ...) since 2008. In many ways it has been very successful in helping to develop collection networks and processing facilities. Every year thousands of metric tonnes of this hazardous material are diverted from landfills, much of the materials being recycled into new products.

That is not to say we have not had problems along the way. These problems have led to numerous changes over time including new framework legislation and [Regulations](#) that have just come into force this year.

This is a complicated policy to get right. Luckily for you – Ontario has over two decades of experience in what has worked and what has not. There is further experience in many of the other Canadian provinces with this type of policy for household hazardous waste. You want to ensure that you get this policy right.

A couple areas worth mentioning as lessons:

- Prescribe outcomes, not process - Rather than stipulating the elements of a HHW collection and management system, focus on the outcomes (i.e., state-wide collection and the targets producers should meet) and allow companies to freely engage the market to establish the most effective system. This incents economic efficiencies and innovation.
- Establish a clear and achievable timeline for implementation – If a program is rushed it can lead to a risk that the new system will not be well-received by consumers and cost premiums.



- Ensure that definitions in the regulation set a level-playing for all producers – the definitions of producer and supplied (e.g., sold) have evolved in Canada over the years to better capture all materials in the market and all producers. We are likely into version 10 or 20 with each province learning from the other to better account for areas like e-commerce. Definitions are also important in ensuring it is clear what products are included and what are not.

When Ontario expanded the hazardous products captured in 2010, it faced almost immediate backlash from the public about cost increases (Enviro-Fees) on products like fire extinguishers, household cleansers, bleach and cement being included. Some of these costs concerns were related to a rushed policy and improper signals to retailers. Regardless the confusion led to the government backtracking within the next few weeks due to public pressure. Many of the products mentioned above were removed from the policy.

- Drive high targets – targets are what incents innovation and economies of scale
- Ensure proper oversight and enforcement – this is what ensures a level playing field so that it is not only good corporate citizens are paying the costs.

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