

## **Batteries, Lighting and Additional Electronics (BLAE) Extended Producer Responsibility (EPR) Consultation Summary**

The BLAE targeted EPR consultations took place between February and April of 2022. The following groups were provided with a presentation and ongoing communications whenever requested:

- Producers
  - o Industry associations (brand owners/manufacturers) \*
  - o Producer Responsibility Organizations (PROs) representing producers in other provinces
- \* Industry associations and PROs invited their brand owner members and clients to participate
- Retail Council of Canada
- Dan-X Recycling Ltd. (local mercury lighting processor)
- Municipalities
- Efficiency Nova Scotia
- Eastern Recyclers Association (EnviroDepots)
- Environmental organizations
- Service providers

Overall there was favourable response to the engagement and support to harmonize Nova Scotia's regulations with Prince Edward Islands'. Comments from the private sector generally reflected concerns about the potential for government to be overly prescriptive in its regulations, which they felt can lead to an inefficient system.

A summary of feedback is categorized and presented below.

### What to regulate/obligate:

- Regulate residential materials only, not commercial materials.
- Do not regulate floor model printers as part of the additional electronics regulations as the vast majority of these printers are already diverted from disposal.
- Consider regulating all lead acid batteries, not just those under 5 kg.
- Lead acid batteries are being successfully recycled. There is no need to regulate them.
- Support collecting all end-of-life bulk mercury, not just mercury in lighting.
- Support targeting all lamps, not just mercury containing lamps.
- Regulate more materials under EPR regulations.

### How to regulate:

- Do not regulate how industry will pay for the program, especially with respect to visibility of fees.
- Be careful when setting collection, capture and/or recycling targets. Look to other jurisdictions for guidance. Targets need to be in the producers' plan, not in the regulations.
- One producer responsibility organization to represent obligated brand owners is preferred.
- No third-party oversight agency is required. Oversight can be managed by the government.
- Ensure definitions for obligated materials, producer responsibility organizations, collection, etc. are clear and harmonized wherever possible.
- Allow businesses from outside of Canada to voluntarily act as the obligated party.
- Support landfill disposal bans for obligated materials.
- Regulate first sellers into the province, not brand owners.

Timing/Implementation:

- Provide appropriate timelines to implement the program from the time regulations are passed.
- Regulate batteries, lighting and additional electronic after printed paper and packaging EPR implementation has begun.

As Environment and Climate Change (ECC) staff conduct their analysis this input will be considered. The Department also continues to communicate with other Atlantic provinces on the work to help maximize harmonization.

If you have any questions or further feedback, please do not hesitate to contact Bob Kenney at 902-499-2178 or at [robert.kenney@novascotia.ca](mailto:robert.kenney@novascotia.ca).