

June, 2021

The Ministry of Environment and Climate Change Strategy (the “ministry”) has released an Intentions Paper outlining proposed changes to the Hazardous Waste Regulation (HWR) for the management of household hazardous waste and similar wastes from institutional and commercial sources. These wastes are referred to using the new term “moderate risk wastes”.

The Intentions Paper is available at the following link:

<https://www2.gov.bc.ca/assets/gov/environment/waste-management/hazardous-waste/hazardous-waste/legsregs/hwr-ip.pdf>

Please use this form to submit feedback on the Intentions Paper.

The ministry welcomes comments on the information and proposals outlined in this Intentions Paper. Please submit comments using the comment form or by e-mail or mail at the address below.

All responses received by **July 30th, 2021** will be considered by the ministry in preparing the proposed changes to the regulation. Completed response forms or submissions may be submitted as follows:

- By emailing a copy of a completed form to this email address:
moderateriskwastes@gov.bc.ca
- Or by mail to:
Ministry of Environment and Climate Change Strategy – Hazardous Waste Regulation
Amendments
525 Superior Street, 3rd Floor
PO Box 9341 Stn Prov Govt
Victoria, BC V8W 9M1

All submissions will be treated with confidentiality by ministry staff and contractors when preparing consultation reports. Please note, however, that comments you provide and information that identifies you as the source of those comments may be publicly available if a Freedom of Information request is made under the *Freedom of Information and Protection of Privacy Act*.

If you have any questions or comments please email: moderateriskwastes@gov.bc.ca.

FEEDBACK ON SPECIFIC PROPOSALS

Regulating Wastes Based on Tiers (Section 5.1 in Intentions Paper)

1. Do you have any feedback on the general approach of regulating moderate risk waste based on Tiers?

2. Do you have any comments on the specific types of waste listed under each Tier and how they are proposed to be regulated? Should any wastes be added or removed from the Tiers (Table 1)?

Proposed Requirements for Return Collection Facilities (RCFs) (Section 5.2)

3. Do you have any comments regarding the proposal that an RCF would need Director approval to collect hazardous waste that is not listed in Table 1?

4. A one-day collection event would be able to collect all types of hazardous waste from households, including those not listed in Table 1 (without needing Director Approval). Do you have any comments regarding that proposal?

5. Do you have any comments on proposed requirements for RCFs that accept Tier 1 wastes, including the proposed storage requirements outlined in Appendix 1?

Special Considerations for Lead-Acid Batteries (Section 5.3)

6. Do you have any comments on the proposed requirements for storing and transporting lead-acid batteries, including the circumstances in which these activities are proposed to be regulated under the Hazardous Waste Regulation?

License to Transport (LT) (Section 5.4)

7. Do you have any comments on the proposed conditional exemption for a License to Transport (LT), including the conditions for exemption (e.g., the waste is regulated under the Transport of Dangerous Goods Regulation)?

8. Should the Ministry consider other exemptions from needing an LT?

Manifests (Section 5.5)

9. Do you have any comments on the proposed exemption for manifests, including the conditions for exemption?

Generators of Tier 1 Wastes Operating as Return Collection Facilities (RCFs) (Section 5.6)

10. Do you agree with or have any comments regarding the proposal that generators of Tier 1 wastes who also operate RCFs would have to comply with RCF storage requirements for all Tier 1 waste handled on-site?

Electronic Wastes (Section 5.7)

11. Do you have any comments regarding the proposed conditional exemption for electronic wastes from the Hazardous Waste Regulation?

12. Is the proposed hazardous waste ‘generation point’ (the point at which the Hazardous Waste Regulation would apply) clear?

Special Considerations for Refrigerants (Section 5.8)

13. Do you have any comments on the proposed requirements for refrigerants and the point at which the HWR would start to apply (i.e., once refrigerant is removed from an appliance)?

Tier 3 Wastes – Pharmaceuticals (Section 5.9)

14. Do you have any comments on the conditional exemption from the Hazardous Waste Regulation for the collection and storage of pharmaceuticals?

Institutional and Commercial Waste (Section 5.10)

15. Do you have any comments on the proposed requirements for institutional and commercial waste, including the proposal to explicitly allow these wastes to be accepted at RCFs?

PCB Ballasts (Section 5.11)

16. Do you have any comments on the proposal to exempt homeowners from the requirement to obtain a BC Generator number from the ministry?

Mercury-Containing Light Bulbs (Section 5.12)

17. Do you have any comments on the proposed outcome-based requirements for mercury-containing light bulbs, and/or the following specific proposals:

- i. Defining crushed light bulbs as hazardous waste, and
- ii. Considering the crushing of light bulbs as treatment of hazardous waste, which requires a registration with the ministry and compliance with treatment requirements in the Hazardous Waste Regulation

Facilities That are Currently Registered Sites (Section 5.15)

18. Do you have any comments on the proposal to allow RCFs to maintain their registration as a Registered Site, if already in place, as opposed to re-registering as an RCF?

General Questions

19. Should the ministry consider other changes to the Hazardous Waste Regulation to better support the collection and transport of moderate risk wastes?

Hazardous Waste Regulation Intention Paper – Response Form

20. Should any other changes be made to specifically address the collection and transport of moderate risk wastes in remote areas?

21. Do you have any comments on the proposed alternative to develop a stand-alone regulation as opposed to keeping the proposed requirements (outlined in the Intentions Paper) within the Hazardous Waste Regulation?

22. Do you have any other feedback to provide on the proposed changes?

CONTACT INFORMATION

If you wish to receive further information concerning updates to the proposed amendments to the Hazardous Waste Regulation, please provide your contact information – including an email address – below. The contact information provided will only be used for the above stated purpose.

Personal information is collected under the Freedom of Information and Protection of Privacy Act (FOIPPA) s.26(c) and 26(e) for the purpose of providing updates to the Hazardous Waste Regulation (HWR).

All submissions will be reviewed for inclusion without attribution in a consultation summary report to be made public following the consultation period. Please note that comments you provide and information that identifies you as the source of those comments may be publicly available if a Freedom of Information request is made under the Freedom of Information and Protection of Privacy Act.

If you have any questions regarding the collection of this information, please contact:

Michael Schwalb, Senior Policy Specialist
778-698-4888
525 Superior, Victoria,
British Columbia, V8V 0C5

Name of Individual and Organization if applicable:

Email address:

Background (please check all that apply):

- Local Government
- Other public sector organization
- Operator of an RCF
- Transporter
- Hazardous Waste Management Facility
- Retailer or Producer under the Recycling Regulation
- First Nation
- Involved with community or environmental group
- Interested individual with no affiliations
- Other (please describe):