

June 14, 2021

Hon. Jason Nixon
Minister of Environment & Parks
323 Legislature Building
10800 – 97 Avenue
Edmonton, Alberta T5K 2B6

Sent to e-mail: aep.minister@gov.ab.ca

RE: Government of Alberta cancellation of HHW program funding

Dear Minister Nixon,

The Recycling Council of Alberta (RCA) has been Alberta's trusted voice on credible and effective waste prevention and diversion systems for more than 30 years. Our vision is a prosperous, waste-free Alberta enabled through a circular economy approach. RCA members include municipalities, recyclers, small and large businesses, not-for-profits and others who share our vision for a strong Alberta underpinned by a circular economy.

Our municipal members are raising an alarm. On June 1, 2021, the Government of Alberta (GoA) ceased disposal funding for the GoA's provincial Household Hazardous Waste (HHW) program. The GoA has funded HHW collection, transportation, and disposal since 1988, first under the Alberta Special Waste Management Corporation (from 1988-1990)¹ and since through a grant provided by Alberta Environment and Parks (for the costs of collection and transportation) and though funding provided by Alberta Infrastructure (waiving disposal fees at the Swan Hills Treatment Centre). The total value of GoA funding provided to Alberta's municipalities² has been approximately \$3 million per year and was sufficient to ensure municipalities were encouraged to collect this material from their ratepayers for environmentally responsible disposal.

Alberta Infrastructure has now closed the Swan Hills Treatment Centre to HHW materials and in doing so has ended its 30 years of GoA funding for HHW disposal costs. As of June 1, 2021, municipalities are required to pay the full costs of HHW disposal, which is approximately \$2 million per year. This added cost burden is expected to affect municipal budgets for several years until the GoA can regulate and implement an extended producer responsibility (EPR) system for this material, effectively transferring the costs and responsibility for managing it from municipalities to producers.

¹ Government of Alberta, 2001. Household Hazardous Waste Roundups. Available at: <https://open.alberta.ca/dataset/12eda198-153a-427e-9f9c-6caa43ac83b4/resource/fab4e74b-1954-4e4c-b940-b949320dfe20/download/householdhazardouswasteroundup-may04-2001.pdf> (viewed June 6, 2021).

² Government of Alberta n.d. Household Hazardous Waste Program. Available at: <https://www.alberta.ca/household-hazardous-waste-program.aspx> (viewed June 6, 2021). Quote:

- Alberta Environment and Parks (AEP) provides funding towards two aspects of the program:
 - Material collection from municipalities and transportation to the Swan Hills Treatment Centre (\$1.5 million in 2016-17)
 - Material disposal at Swan Hills Treatment Centre (\$480,000 in 2016-17)
- Alberta Infrastructure subsidizes the cost of material disposal at Swan Hills Treatment Centre (about \$1.5 million in 2016-17).

The RCA would like to raise the following concerns for the GoA's consideration:

- HHW collection is an optional service provided by municipalities in Alberta, which they could cease at any time. By law, Albertans can freely dispose of HHW in their garbage.³
- GoA funding for HHW collection and disposal was originally established to discourage this practice because its disposal in landfill poses long-term environmental risks.
- GoA funding is being cut at a time of unprecedented hardship for Alberta's municipalities in the midst of a global pandemic. Municipal budgets are already strained, and municipalities could be forced to cease collection of this material.
- The environmental burden of increased disposal of this material in Alberta's landfills is unacceptable.

Given the greater context, it seems short-sighted for the GoA to halt funding in advance of the transition to EPR and further to choose to halt this funding during the spring/summer period. This action leaves municipalities scrambling to find funding for this valuable service at the exact time of year when Albertans are spring cleaning and seeking options to dispose of this material in an environmentally responsible way.

The GoA has proposed that HHW be managed under an EPR system. The RCA supports the transition, but we encourage the GoA to expedite the implementation of EPR for HHW to minimize the unexpected burden on municipal budgets. HHW is a simple suite of materials that is already managed under EPR systems in most provinces in Canada. It is more than feasible for the GoA to require EPR for HHW within a year. Industry is already mobilized in other provinces and could easily extend their approach to Alberta.

Until EPR can be regulated, the RCA encourages the GoA to take the steps necessary to ensure the continuation of environmentally responsible management of HHW across Alberta, and ensure that municipalities are not discouraged from collecting this material from their ratepayers.

Best,



Jodi Tomchyshyn London
President, Recycling Council of Alberta

Cc: Christina Seidel, Executive Director, RCA
Ed Gugenheimer, Alberta Recycling Management Authority (ARMA)
Che-Wei Chung, Alberta Urban Municipalities Association (AUMA)
Warren Noga, Rural Municipalities of Alberta (RMA)
Hon. Prasad Panda, Minister, Alberta Infrastructure

³ Government of Alberta. 1996. Alberta User Guide for Waste Managers. Available at: <https://open.alberta.ca/publications/1707400> (viewed June 6, 2021).