

**Summary of Stewards' Comments Submitted
Following Consultation Meetings to Review Revised Phase 1 Orange Drop (MHSM) Definitions**

Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Definition of Auto-Related Products - Antifreeze, Oil Containers and Oil Filters	Do the antifreeze, oil containers and oil filters definitions only apply to products supplied to the automotive market? If someone is supplying antifreeze, oil or oil filters to another sector are those products exempt? For example, if I'm supplying oil to the health care market for maintaining medical/dental equipment is that product captured?	As specified by the Minister, Antifreeze, Oil Containers and Oil Filters are to be collected from residential and all IC&I generators. This would include but not be limited to the automotive market. Antifreeze, Oil Containers and Oil Filters Supplied to the health care market would be included in 'all IC&I'.
Definition of Auto-Related Products - Antifreeze, Oil Containers and Oil Filters	Suggest Stewardship Ontario continue to generally align its list of containers subject to or exempt from its fees with the lists issued by the five used oil associations in QC, MB, SK, AB, BC..	Harmonization with other provincial programs is an SO objective where harmonization can be achieved while complying with the WDA and the Minister's direction.
Definition of Antifreeze	Bulk: We would recommend that bulk anti-freeze be included in the revised definition just as we did in the planning for phase 2. Research indicates that generators often buy A/F in bulk to meet their needs in flushing consumers' radiators. To not include bulk would put an unfair fee burden on packaged product and not meet the nexus principle. Further the definition of bulk inclusions and exclusions needs to be clear so as to avoid applying fees to bulk A/F that ends up in industrial sites which already have a recycling program in effect and would therefore not require SO to manage the waste. Examples include mine sites in Northern Ontario. And finally, we must ensure that bulk product shipped to companies that subsequently package coolants should not have the fee applied. To do so would amount to double counting. We recommend it be applied at the packagers' level as they would defacto become the steward.	The list of examples includes 'bulk and packaged'. Antifreeze that is managed under a recycling program would not be available for collection by SO and should be taken into account by SO when calculating the quantity of Antifreeze available for collection. The definition of the obligated steward in the Rules would determine which party is obligated to report bulk product shipped to a company that subsequently packages the product for sale.
Definition of Antifreeze	We do not support the proposed addition of antifreeze supplied in all container sizes including bulk supplied in containers in greater than 30 litres in the Phase 1 MHSW program revision example list. Bulk antifreeze and the containers in which it is	As specified by the Minister, Antifreeze is to be collected from residential and all IC&I generators. While antifreeze products supplied to the residential and

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	<p>contained are clearly distinguishable from products used in residences. Antifreeze over 30 litres is typically provided in returnable, reusable and metallic containers. There is a risk that lack of clarity on the term "bulk" could inadvertently subsidize smaller plastic containers. Further there is already a regulatory requirement for large generators to manage liquid waste and containers under Reg. 347. The proposed change would result in a duplication of effort and require changes to systems already in place. This is not efficient or effective. The Phase 1 program plan needs to provide a clear definition for "bulk" and clearly exclude all bulk antifreeze and the associated containers, including tanker shipments, used in vehicle assembly facilities in the example list for this reason. In other words, all antifreeze sold in containers with a volume of greater than 30 litres must be excluded.</p>	<p>IC&I marketplace can be distinguished, waste antifreeze from residential and IC&I sources is not distinguishable. "Factory fill initial charge of vehicle antifreeze" is listed as an exclusion.</p>
Definition of Antifreeze	<p>For the absence of doubt, the term "BULK" should be reserved for product not sold in a container and therefore the term "BULK" should not include a DRUM.</p>	<p>Comment noted.</p>
Definition of Oil Containers	<ul style="list-style-type: none"> • Suggest Stewardship Ontario continue to generally align its list of containers subject to or exempt from its fees with the lists issued by the five used oil associations in QC, MB, SK, AB, BC. • Clarity as to which containers are subject to or exempt from SO's fees is critical. A list, rather than a definition, is much preferred. A definition requires interpretation, which may vary amongst Stewards and between Stewards and SO. If a definition is required to meet SO's mandate, it should be clearly subordinate to the list, which would be subject to amendment from time-to-time. In other words, the list should be THE definitive document. • As discussed on February 22, the current definition for oil containers is unclear and conflicts with the associated list. E.g., the definition refers to "containment of lubricating oil 	<ul style="list-style-type: none"> • Harmonization with other provincial programs is an SO objective where harmonization can be achieved while complying with the WDA and the Minister's direction. • The Minister's direction referred to containers that contained lubricating oil. A definition of lubricating oil has been utilized that can be used as a reference for the list of obligated oil containers.

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	<p>products...", whereas the list of containers subject to SO's fees includes such non-lubricants as "rustproof oil" and "dedusting oil". However, this need not be a problem, provided the definition is subordinate to the list. A comparison of legislation in provinces where a used oil association operates, and the "EHC Applicable Products List" issued by the association, shows that some associations have extended their list of EHC-applicable containers beyond the strict definition in the legislation.</p> <ul style="list-style-type: none"> • Draft definition. The following is intended to be, and should be read as, a draft only. It seeks to meet SO's stated need for a definition, while making it clear that what I've titled the Applicable and Excluded Container List is the sole determinant of whether a container is subject to or exempt from SO's fees. "Oil container means a container with a volume of 30 litres or fewer for a Product set-out on the Applicable and Excluded Container List ("Container List") as may be amended from time-to-time. The term Product includes, but is not limited to and from which exclusions may apply, petroleum and/or synthetic oils intended for lubricating machinery or equipment, hydraulic oils, heat transfer oils, and electrical insulating oils, which are supplied by a Steward for use in Ontario. Notwithstanding this definition of Product, the Container List shall be the sole determinant of whether a particular container is subject to or exempt from Stewardship Ontario's fees." 	
Definition of Oil Containers	I would like to offer the following definition for consideration in your program plan: Means oil containers with a volume of 30 litres or less, which are used for the containment of lubricating oil products or any other oil product that is covered on the Applicable Products list.	The Minister's direction referred to containers that contained lubricating oil. A definition of lubricating oil has been utilized that can be used as a reference for the list of obligated oil containers.
Definition of Fertilizers	I agree with the scope of the changes proposed fully.	Comment noted.
Definition of Fertilizers	I still believe that commercial fertilizers should not be in your	As specified by the Minister, Fertilizers are

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	sights as they do not make it for recycling, etc. I also believe that a separation between commercial and domestic is possible as there are very few if any bags, in the domestic market, that are bigger than 18 kg's.	to be collected from residential and small quantity IC&I generators.
Definition of Fertilizers	UAP objects to the wording of one item in the fertilizers table: "Exclusion, fertilizers and supplements, d) supplements referred to in subsections 10.2(3) and (5) (<i>Fertilizer Regulations</i>) – (i.e., seeds coated with inoculant)". It is generally accepted that all inoculants are used almost exclusively on farms. We believe that the above exclusion should be expanded to include all seed inoculants by adding section 10.2(1) of the Canadian Fertilizer Regulations.	This reference has been revised to read: d) supplements referred to in subsections 10.2(1),10.2(1.1), 10.2(3) and 10.2(5) (<i>Fertilizer Regulations</i>)
Definition of Fertilizers	The Association was surprised to see the addition of "Fertilizer supplied to owners and/or operators of an agricultural operation who have a valid Farm Business Registration number" to the list of fertilizer program exclusions. It appears that this option was introduced as a method for removing inoculants from the requirements of the Phase 1 MHSW Program. Although OABA was supportive of creating an exclusion based on the FBR number for the consolidated phase, we do not feel that this solution is appropriate for managing a single type of product under the current program. It is OABA's belief that the FBR exclusion will create an increased amount of paperwork and administrative requirements for both industry and Stewardship Ontario. Both parties would be better served by establishing an exclusion that specifically removes inoculants from the program. Even though these products are not included in the list of products exempted from registration as set out in 3.1 of the Regulations, OABA recommends that Stewardship Ontario establish a new exclusion for inoculants that references 10.2(1) of the Fertilizer Regulations.	The reference to "Fertilizer supplied to owners and/or operators of an agricultural operation who have a valid Farm Business Registration number" has been deleted. A reference to Section 10.2(1) has been added to point d) as follows: supplements referred to in subsections 10.2(1), 10.2(1.1), 10.2(3) and 10.2(5) (<i>Fertilizer Regulations</i>)
Definition of Fertilizers	In general, we agree that the definition captures the original	The reference to "Fertilizer supplied to

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	<p>intent of Phase I, however, we have noted the following exclusion that was not discussed during our consultation: 'Fertilizers, supplements and micronutrients supplied to owners and/or operators of an agricultural operation who have a valid Farm Business Registration number'. We see this exclusion as one that is difficult to verify and could lead to 'free riders' who claim to sell only to those with Farm Registration Numbers but also sell to consumers. To truly ensure that this exclusion is applied fairly it would likely require those businesses that deal with the Farm Sector to implement onerous systems to track sales to farmers and consumers. If the intent of including this under exclusions is to deal with the issue of inoculants, we would suggest that inoculants be simply identified in the list of exclusions.</p>	<p>owners and/or operators of an agricultural operation who have a valid Farm Business Registration number" has been deleted.</p> <p>A reference to Section 10.2(1) has been added to point d) as follows: supplements referred to in subsections 10.2(1), 10.2(1.1), 10.2(3) and 10.2(5) (<i>Fertilizer Regulations</i>)</p>
Definition of Fertilizers	<p>We recommend removing the proposed section which reads as follows: "Fertilizers, supplements and micronutrients supplied to owners and/or operators of an agricultural operation who have a valid Farm Business Registration number" under the heading of "Exclusions". Instead we recommend adding the following under "Exclusions" so it states: "Seed Inoculants as defined in Section 10.2 (1) of the Fertilizers Regulations" (C.R.C. c. 666)". The reason is that first, the inoculants used to coat a seed are already excluded by Section 10.2 (3) of the Fertilizers Regulations. This additional exclusion would exempt farm inoculants which are applied separately. Such "stand alone" inoculants are used exclusively by farms and would be treated the consistently with those inoculants used to coat seeds.. Second, requiring farmers and those stewards who sell into the farm markets will incur a substantial cost in order to set up such a tracking mechanism for excluding such products.</p>	<p>The reference to "Fertilizer supplied to owners and/or operators of an agricultural operation who have a valid Farm Business Registration number" has been deleted.</p> <p>A reference to Section 10.2(1) has been added to point d) as follows: supplements referred to in subsections 10.2(1), 10.2(1.1), 10.2(3) and 10.2(5) (<i>Fertilizer Regulations</i>)</p>
Definition of Fertilizers	<p>With the benefit of hind sight, we might want to add one small addition and that is to include subsection (1.1) even though it is</p>	<p>A reference to Section 10.2(1.1) has been added to point d) as follows: supplements</p>

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	<p>a subset of (1) but adding it will clearly include those inoculants in granular form that get applied at time of planting but not necessarily with the seed. As per my comments before, these inoculants covered in (1) and (1.1) are used by farms only and for the crops referenced in the Regulations. That line could then read: “supplements referred to in subsections 10.2(1), 10.2(1.1), 10.2(3) and 10.2 (5) (<i>Fertilizer Regulations</i>)”</p>	<p>referred to in subsections 10.2(1), 10.2(1.1), 10.2(3) and 10.2(5) (<i>Fertilizer Regulations</i>)</p>
<p>Definition of Fertilizers</p>	<p>This definition (file name Material definitions for Rules Fertilizers_Pesticides draft for distribution March 2.pdf) is consistent with Phase 1, implemented through July 2010 and still posted at Stewardship Ontario. As well, it includes a couple of additional useful clarifications as discussed at the consultation on February 25, 2011, and supported by CCSPA and our members who were in attendance.</p> <p>We do, however, strongly suggest that each page of the document should show the date of March 2, 2011, within the pdf file. It is important that the date cannot become detached from the content so that there can be no confusion with any other version posted or otherwise circulated in future.</p>	<p>Comment noted.</p>
<p>Definition of Fertilizers</p>	<p>The proposed definition as explained in the recent consultation meeting: All N-P-K fertilizers, micronutrients and supplements that are registered under the <i>Fertilizers Act (Canada)</i> and therefore would bear a Fertilizers Act registration number supplied in containers equal to or less than 30 litres and/or 30 kilograms is supportable by our Council as compost --- whether marketed as a fertilizer or soil supplement – is not a registered product under the <i>Fertilizers Act and Regulations</i>, reflective of its' Schedule II status.</p>	<p>Comment noted.</p>
<p>Definition of Pesticides</p>	<p>I agree with the scope of the changes proposed fully.</p>	<p>Comment noted.</p>
<p>Definition of Pesticides</p>	<p>The definition as drafted appears to reflect our understanding of the original intent of Phase I, as well as, the discussions that took place on February 25. We thank Stewardship Ontario for considering our input and reflecting it in this definition. We are</p>	<p>Comment noted.</p>

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	in support of this revised definition.	
Definition of Pesticides	<p>FCPC, on behalf of its affected members, supports the revised definition of pesticides, examples and exclusions as provided in the Stewardship Ontario's document distributed following the consultation. Specifically, we agree that the definition of pesticides should read as follows: "Means pesticides including fungicides, herbicides and insecticides registered under the <i>Pest Control Products Act (Canada)</i> bearing the "DOMESTIC" classification that are required to display on the label the symbol shown in Schedule III of the <i>Pest Control Products Regulation (Canada)</i>, the signal words "danger" or "warning" and "poison" and represented by the precautionary symbols octagon or diamond and the skull and crossbones." We agree with the stated examples as follows: Pesticides meeting the definition that bear the "DOMESTIC" classification; Pesticides in aerosol containers that match the definition of Pesticides. We also agree with the list of exclusions as follows: Commercial, agricultural and restricted classifications registered under the <i>Pest Control Products Act (Canada)</i>; Insect repellents for personal use; Sanitizers, disinfectants and anti-microbial products; Pet products; Products regulated under the <i>Food and Drugs Act (Canada)</i>; Pool chemicals; Insecticidal soaps; Diatomaceous earth; Ant traps</p>	Comment noted.
Definition of Pesticides	<p>We are in support of the attached definitions which were circulated on March 2, 2011. We believe that they accurately reflect the definitions from Phase 1 and include the useful clarifications discussed in our consultation on February 25th 2011.</p>	Comment noted.
Definition of Pesticides	<p>We support the revised wording in the document as it reflects the Phase 1 program as it was prior to the implementation of the consolidated plan last July. CropLife Canada wishes to ensure that our sector is treated equitably in relation to other sectors therefore a return to Phase 1 definitions is welcomed.</p>	Comment noted.

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Definition of Paints & Coatings	I would like to explore the option of using the Canadian Environmental Protection Act - Volatile Organic Compound (VOC) Concentration Limits for Architectural Coatings Regulations, definition of architectural coating: "architectural coating" means a product to be applied onto or impregnated into a substrate, for use on traffic surfaces such as streets and highways, curbs, berms, driveways, parking lots, sidewalks and airport runways, or stationary structures, including temporary buildings and their appurtenances, whether installed or detached."	While SO considered use of the CEPA definition for architectural coatings, further discussion with stewards identified that this definition is broader than the original Phase 1 Program Plan definition. The definition for architectural coatings in the January 2011 Rules has been utilized.
Definition of Paints & Coatings	We support the existing definition of Paints and Coatings as "Latex, oil and solvent-based architectural coatings, including paints and stains, whether tinted or untinted." We further recommend that in the Notes: section, the existing definition of "architectural coating" from the "Approved MHSW Rules January 1, 2011 to December 31, 2011" be used as it better reflects the types of products intended to be captured by the Paints and Coatings definition. The definition is as follows: "Architectural coatings means organic coatings intended for onsite applications at ambient temperatures to interior or exterior surfaces of residential, commercial, institutional, industrial, or government structures including; exterior and interior house paints, stains, undercoaters, primers and sealers." We would recommend removing the first example "Paints and coatings for household and industrial, commercial and institutional use." It is restating information in the Sector(s) into which MHSM is Supplied column. The following could be added for further clarification: "Paints and coatings sold as MHSW consumer products." We would also be willing to work with Stewardship Ontario to develop a list of examples of products that would be included.	The definition for architectural coatings in the January 2011 Rules has been utilized. The reference to 'Paints and coatings for household and industrial, commercial and institutional use' has been removed from the list of examples as redundant and confusing as it is an unclear restatement of the information under the column 'Sector(s) into which MHSM is Supplied'.
Definition of Pressurized Containers	<ul style="list-style-type: none"> • The exemption provided under the Phase 1 for "Cylinders that are part of a defined life management program" should 	In the Rules for Stewards, 'Supplied' is defined as "means sold, leased, donated,

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	<p>be kept and expanded to include all cylinders regardless of whether they are sold to Industrial, Commercial, Large or Small IC&I accounts or even to consumers (medical air). As we explained on the CC, all these cylinders are owned by the Gas Company, and the user pays rental fees on them, so it is in the user's best interest to return them to us, for either getting a new one, or for avoiding the rental charges.</p> <ul style="list-style-type: none"> • Since we do not have any control on the final destination of the "disposable cylinders", we recommend that these become part of the Stewardship program. • We recommend modifying the definition of pressurized containers to only include the "Disposable Cylinders, TC - 39M. This category includes the small portable propane cyls (used for camping). 	<p>disposed of, used, transferred the possession or title of or otherwise made available or distributed for use in the Province of Ontario". Cylinders that continue to be owned by the Steward are 'made available' and 'are distributed for use' and are therefore obligated. The MHSW Program is responsible for managing refillable containers that are not returned to stewards for management under a life cycle management program.</p>
<p>Definition of Single Use Dry Cell Batteries</p>	<p>I wanted to suggest alternative language for the "removable battery" definition. I would instead suggest the following language, which aligns with precedence in other laws and programs: <i>A removable battery is any battery designed to be replaced by the end user using basic household tools, and which is removable in a way that is readily identifiable through casual examination of the product or according to instructions in the product user manual, not including work performed by a qualified service technician or tasks that could expose an untrained person to health or safety risks.</i> I would reiterate several of the concerns raised in the discussion, not the least of which is exposing consumers to health/safety risks, and the related liabilities, in damaging a product to remove its battery.</p> <p>In my opinion, there should be no language in a law that encourages or sanctions unsafe behavior with electronics. Nor does there appear to be a manner in which to implement the "with damage" aspect of this language, since finished product manufacturers cannot be complicit in exposing their customers to unnecessary risks. If Stewardship Ontario believes there</p>	<p>The reference has been revised to refer to batteries supplied within and/or embedded in products supplied to a) the residential sector where the products are designed so that the batteries are removable and replaceable b) the IC&I sector where the products are designed so that the batteries are removable by service providers and c) both the residential and IC&I sector where the products are managed under the WEEE Program.</p>

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	<p>are instances where damage to the product to remove the battery is appropriate, as was suggested for a battery in a greeting card, it should call these out specifically, since these would be exception and not the rule. I would suggest that such exceptions should only be specified after consultation with the impacted finished product manufacturers, to ensure the exception is truly appropriate and would not cause any safety/health risk to the consumer to damage the product to remove the battery. There could be risks encountered even with an example like greeting cards. E.g. if someone uses heavy-duty scissors to cut the card to get to the battery, and accidentally punctures the exterior of the battery. Electronic product takeback programs typically address proper end of life handling for non-removable batteries and are a more appropriate, safe and consistent manner in which to cover these batteries in a takeback program. Recyclers are experienced and trained in where such batteries reside and how best to remove them, not end-users.</p>	
<p>Definition of Single Use Dry Cell Batteries</p>	<p>1. Proposed change to Examples, slide 18: Definition for removable battery - needs re-formulation to disconsider the batteries / products which require damaging the product to remove the batteries. Rationale: 1.Damaging the product requires technical skills and knowledge of the product that not all generators have. It is exposing the person who removes the battery to (un-insured) injuries. 2.Damaging the product may also result in damaging the batteries and/or other components (e.g. radioactive source in ionization smoke detectors) that may contaminate the environment. 3. It's practically impossible to include in educational programs "how to do" when damaging or disassembly the product is necessary. Proposed re-formulation: " A removable battery is a battery that can be removed without damaging the product in which the battery was contained "</p>	<p>The reference has been revised to refer to batteries supplied within and/or embedded in products supplied to a) the residential sector where the products are designed so that the batteries are removable and replaceable b) the IC&I sector where the products are designed so that the batteries are removable by service providers and c) both the residential and IC&I sector where the products are managed under the WEEE Program.</p>

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	<p>2. Proposed change to Exclusions, slide 20 Add to phase 1 exclusions " Primary batteries that can be removed only by damaging the product in which the batteries were contained". Rationale: 1. See above - ref. definition for removable battery 2. There are similar removal methods as for rechargeable batteries The recovery/recycling of rechargeable and primary batteries that require product damaging /disassembly have to be included / correlated with WEEE program.</p>	
<p>Definition of Single Use Dry Cell Batteries</p>	<p>For clarity, we would ask that the list of examples be changed to include all current chemistry types as follows: Removable batteries including but not limited to the following chemistries:</p> <ul style="list-style-type: none"> • Alkaline-Manganese • Zinc-Carbon • Lithium • Silver Oxide • Zinc Air <p>We would ask, however, that the proposed scope be limited to those batteries that are meant to be removed/replaced by the end user without damaging the product. It is not feasible to include batteries that can only be removed by damaging the product unless there already exists a stewardship program for that product. We suggest the following as possible wording for this scope: A removable battery is any battery that can be removed without damaging the product in which the battery was contained. If the product is also managed in a stewardship program, the battery will be included in the scope of the battery plan in all cases.</p>	<p>The list of chemistries has been revised to be consistent with the list provided.</p> <p>The reference has been revised to refer to batteries supplied within and/or embedded in products supplied to a) the residential sector where the products are designed so that the batteries are removable and replaceable b) the IC&I sector where the products are designed so that the batteries are removable by service providers and c) both the residential and IC&I sector where the products are managed under the WEEE Program.</p>
<p>Definition of Single Use Dry Cell Batteries</p>	<p>We understand that there are no proposed changes to the definition of single-use dry cell batteries and that the definition used in the original Phase 1 remains the same. We would ask, however, that the proposed examples be limited to those batteries that are meant to be removed/replaced without</p>	<p>The reference has been revised to refer to batteries supplied within and/or embedded in products supplied to a) the residential sector where the products are designed so that the batteries are removable and</p>

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	<p>damaging the product. It is not feasible to include batteries that can only be removed by damaging the product unless there already exists a stewardship program for that product. We also understand that in keeping with the Minister's direction in the October 25th letter that the revised Phase 1 program will collect single-use dry cell batteries from residential and all IC&I generators and that targets set as part of the Consolidated MHSW plan will remain in place as they pertain to Phase 1 batteries.</p>	<p>replaceable b) the IC&I sector where the products are designed so that the batteries are removable by service providers and c) both the residential and IC&I sector where the products are managed under the WEEE Program.</p>
<p>Definition of Single Use Dry Cell Batteries</p>	<ul style="list-style-type: none"> • The definition of "removable" has been modified, eliminating the term "easily". With terminology and applicability that is subjective, the MOE, SO and WDO, as well as the retailers, are left to their own interpretation as to whether or not an eco-fee should apply. This is the same steward confusion that led to the unraveling of the MHSW Consolidated Program in July 2010. Clear communication of what is included in the program is critical to avoid or reduce the risk associated with applying eco-fees incorrectly. • SO stated that there will be no consumer education on what constitutes a removable battery, relying instead on consumer understanding. It is our position that the consumer will NOT destroy a product to remove a battery for proper disposal. Therefore, there will be a remittance of steward fees on batteries that will not be collected in the foreseeable future. The remedy would be a clear definition of the batteries included in the program, a clear definition of "removable" and an appreciation for the realities of what actions consumers are willing to take with respect to recycling batteries. • As stewards, we are not battery experts, nor are we authorized to dismantle and destroy product to determine battery composition. To suggest that the vendor community is capable of providing this data is an unrealistic 	<p>The reference has been revised to refer to batteries supplied within and/or embedded in products supplied to a) the residential sector where the products are designed so that the batteries are removable and replaceable b) the IC&I sector where the products are designed so that the batteries are removable by service providers and c) both the residential and IC&I sector where the products are managed under the WEEE Program.</p>

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	<p>assumption. With nearly 30% of our merchandize supplied by overseas vendors, the information is simply not available. To calculate the size and type of battery and its weight and chemical composition is an unnecessary burden to all stewards. Furthermore, it complicates the message to consumers.</p>	
<p>Definition of Solvents</p>	<p>SO has proposed a definition change to include “and/or” for clarity. We suggest that it might be clearer to add a flashpoint assessment directly to the definition, to have “or” at the end of each bullet and add the bullet, “or all of the above”.</p>	<p>Suggested revision incorporated into definition for clarity.</p>
<p>Definition of Solvents</p>	<p>With respect to the solvents definition, examples and exclusions, FCPC notes and supports the exclusion for “cleaning products that are not supplied as solvents”. We also agree with the proposal to use “supplied” rather than “sold” for consistency with the definition of the term “supplied” in the Program Rules.</p>	<p>Comment noted.</p>