



To: Lorrie Hayes
Sustainable Consumption Section
Environment Canada
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Re: Comments to the *Proposed Notice Requiring the Preparation and Implementation of Pollution Prevention Plans in Respect of Mercury Releases from Mercury Switches in End-of-life Vehicles Processed by Steel Mills*

From: Pollution Probe

Date: February 7, 2007

Please accept this submission as Pollution Probe's formal comments on the proposed notice cited above.

Pollution Probe applauds the Government of Canada's initiative to require the preparation and implementation of pollution prevention plans with respect to mercury releases from mercury switches in end-of-life vehicles processed by steel mills and are very happy to see that an annual capture rate of 90 per cent has been set (to be achieved within the first four years of the mercury switch management program).

The one area that has not been addressed in the proposed notice is the fate of the mercury collected as a result of the pollution prevention plans. We urge the Government of Canada to explore end-of-life options for the mercury collected and to retire the mercury that is accumulated, rather than allowing it to enter into the global market. The retirement of the mercury collected from switches will require a storage infrastructure. Considering that there are many other products in Canada that contain mercury and that the Government of Canada is now holding consultations on a risk management strategy for mercury-containing products, it would be advantageous to establish infrastructure now that will be able to accommodate the storage of mercury collected from these other sources.

Thank you for the opportunity to submit comments.

Sincerely,

Ken Ogilvie
Executive Director
Pollution Probe