



2016

Extended Producer Responsibility (EPR)

# SUMMARY REPORT

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Summary of advancements in EPR policy and programs in Canada during 2016

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EPR Canada reports on the progress made by Canadian federal, provincial and territorial governments year-over-year in developing and implementing extended producer responsibility (EPR) policies and programs in compliance with the Canadian Council of Ministers of the Environment's (CCME) Canada-wide Action Plan on EPR.

This is the fifth and final report in a series that EPR Canada has published beginning in 2012 reflecting the progress jurisdictions have made to date, with a particular focus on the activities that occurred in the 2016 calendar year. See previous report cards and a summary at [www.eprcanada.ca](http://www.eprcanada.ca).

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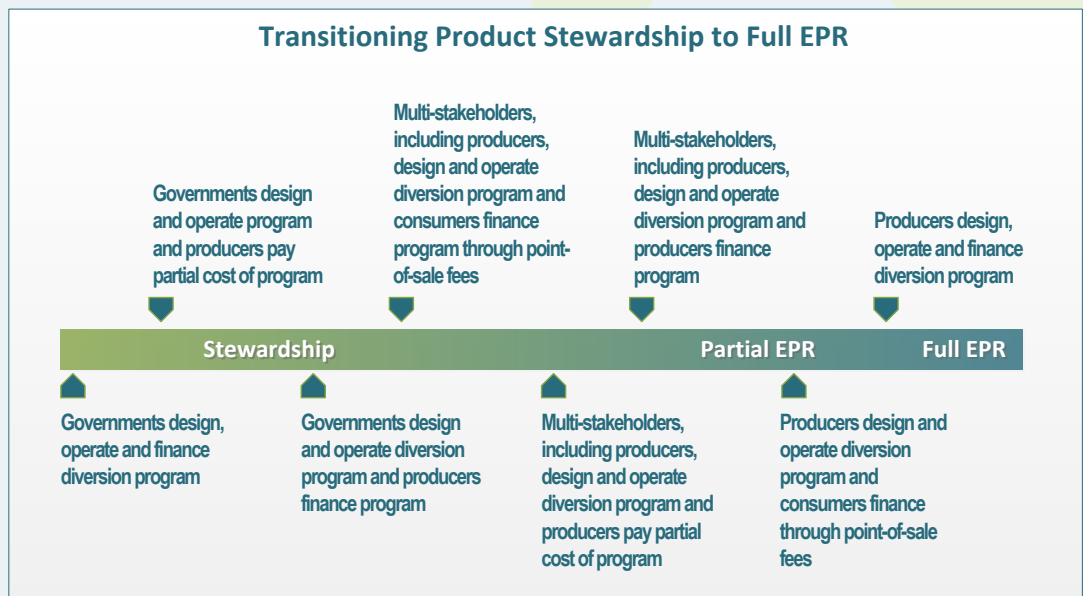
## EPR Canada

**EPR (Extended Producer Responsibility) Canada** is a not-for-profit organization formed in 2011 by [eight like-minded Canadians](#) who have been involved in EPR policies and programs since they first began to take hold in this country in the 1990s. The goal of EPR Canada is to foster continued growth and improvement of EPR policies, programs and practices in Canada ([www.eprcanada.ca](http://www.eprcanada.ca)).

### What EPR Canada Seeks to Accomplish with Our Series of Report Cards

In 2012, EPR Canada set out to produce periodic reports on federal, provincial and territorial EPR policies, programs and practices to:

- 1) encourage leadership, innovation, best practices and effective EPR policy and program development, implementation, management and harmonization across Canada; and
- 2) encourage jurisdictions to evolve product stewardship and partial EPR programs to full EPR programs



### EPR Canada's Publishing Schedule

After publishing two fully-scored report cards in 2012 and 2013, EPR Canada acknowledged that developing EPR policies and programs takes time. Therefore, EPR Canada published an EPR Summary Report in 2014 before returning to a fully-scored report card in 2015. In 2016, we published a discussion paper, "Getting EPR Oversight Right".

- EPR Canada's [2012 Report Card](#) focusing on 2011 activities
- EPR Canada's [2013 Report Card](#) focusing on 2012 activities
- EPR Canada's [2014 Progress Summary](#) reflecting on 2013 activities
- EPR Canada's [2015 Report Card](#) focusing on 2014 activities
- "[Getting EPR Oversight Right](#)": EPR Canada Discussion Paper, March 2016

## *Preparation of this Report*

In February 2017, EPR Canada sent a letter to each provincial and territorial government as well as the Government of Canada asking officials to update the information provided for the 2015 report card including new policy and program achievements and innovations that contributed to their EPR regulatory instruments. EPR Canada reviewed the submissions, conducted our own overview of initiatives and generated this final summary reflecting activities completed by 2016.

Throughout the report card and summary report process, EPR Canada evaluated jurisdictions' performance in EPR policy in three main category areas:

1. **Commitment**—towards [CCME's Canada Wide Action Plan Phase 1 and Phase 2 product and material lists](#).
2. **Implementation**—EPR implementation focuses on policies and practices to support operations including:
  - a. activities to ensure that producers met their regulatory obligations, including free rider tracking and actions;
  - b. activities to monitor the performance of EPR activities including program reviews;
  - c. EPR legislation review procedures and outcomes; and
  - d. evidence of policies and practices to support EPR outcomes
3. **Accountability**—target setting and verified public reporting on results, including:
  - a. performance objectives including collection, recovery and recycling targets (and target setting methodology) for each EPR program;
  - b. non-diversion environmental performance measurement practices;
  - c. enforcement and consequences if producers or producer responsibility organizations do not achieve their targets, including dispute mechanisms; and
  - d. transparent and public reporting on each EPR program's annual report and program reviews.

For each Report Card, EPR Canada weighted these categories differently over the seven-year period, encouraging a shift in emphasis from commitment to implementation to accountability.



## *The State of EPR in Canada: What have we learned?*

*Note - the expanded version of [The State of EPR in Canada: What have we learned?](#) can be found on the EPR Canada website.*



Extended producer responsibility policies, legislation and programs have grown in number, scope and scale across Canada since EPR Canada was founded in 2011, with most provincial governments (except Alberta) using them as policy and regulatory instruments. Over 120 full EPR and a few shared responsibility programs now exist.

### **Areas of EPR Achievement**

Phase 1 of the Canadian Council of Ministers of the Environment's (CCME) 2009 Canada-wide Action Plan for EPR has been largely fulfilled or is underway with the notable exception of packaging and printed paper in the Maritimes, resulting in significant tonnages of resource materials being recovered for recycling instead of being disposed of in landfill.

EPR has become institutionalized as regulated and voluntary producer responsibility organizations have formed, encompassing large budgets and significant staff resources. The concept of end-of-life management of waste resources is now broadly accepted and a new generation of businesses have evolved to provide services to waste recovery and recycling from collection to end-markets.

Over the six years of EPR Canada's operations, jurisdictions responded positively to our process to benchmark and track the progress of EPR development measured by commitment, implementation and accountability. It is clear EPR is well established in Canada. Now attention is increasingly focused on where and how to further apply EPR; on how programs can be made to perform more efficiently and effectively; and especially on how oversight, accountability and reporting can be improved.

### **Continuing EPR Challenges**

Despite this progress, major challenges in EPR development remain. The CCME's goal of implementing EPR on Phase 2 materials (e.g., construction and demolition materials, textiles and carpets, appliances, ozone depleting substances) by 2017 will be missed and it is disappointing that little is being done to address these major components of the waste stream. Further, the hope that EPR would drive design-for-the-environment has not been realized. This might be attributable in part to the common practice of flow-through costing whereby producers of designated products pass costs through to consumers as visible point-of-purchase fees instead of internalizing appropriate funding as a cost of doing business. In addition, and with the notable exception of packaging, neither visible fees nor internal accounting when they do exist, differentiate products based on their end-of-life recyclability or overall environmental performance.



Another EPR area that needs improvement is program performance and accountability. EPR Canada has commented frequently on the gap in setting program performance targets. Independent program reporting often is not required and there are no penalties for failing to meet targets, suggesting they are aspirational. EPR Canada has also raised concerns that third-party agencies and departmental oversight are not sufficiently resourced to keep track of and enforce measurement goals.

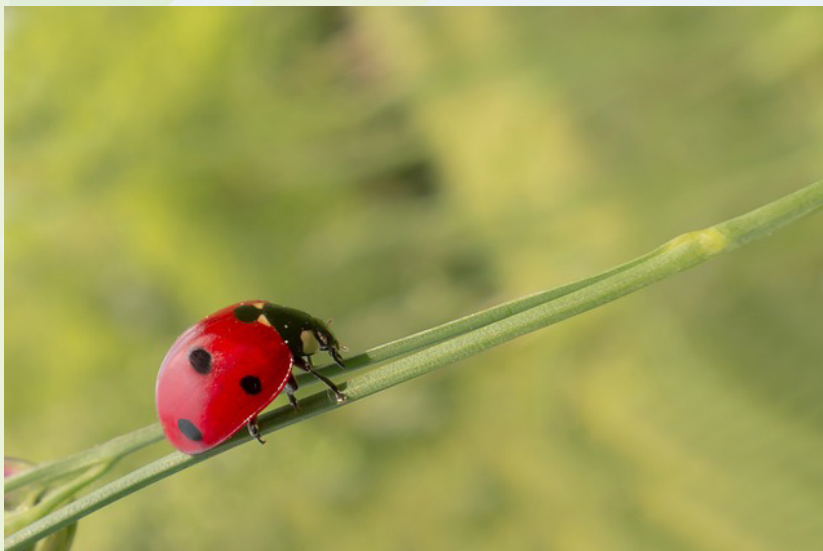
Other areas that remain to be explored in EPR program development in Canada are the single dominant producer responsibility organizational model vs. the competitive organizations models more prevalent in Europe, as well as the lack of program harmonization that results in unnecessary and expensive administrative and financial burdens on producers and indirectly on consumers.

### **EPR as a Means Toward Zero Waste and the Circular Economy**

Despite the CCME's recommendation that EPR in Canada be buttressed with other supportive policies such as landfill bans, green procurement and disposal charges, this has generally not occurred. EPR regulations are commonly stand-alone instruments, albeit in the company of other EPR initiatives. Also, in most jurisdictions, EPR is not viewed in the context of sustainable development, climate change and the emerging concepts of zero waste and the circular economy. While some regulations are fashioned with these concepts as foundations, e.g., Ontario's Waste Free Ontario Act, it's not clear the depth of the commitment nor the role that EPR can play.

### **Conclusion**

Over the past decade, EPR has become an established regulatory instrument in Canada with the focus primarily on the rollout of regulations and programs. However, the challenge now is to follow rollout with more attention centered on improving program effectiveness and efficiency and on ensuring that programs are transparent, have appropriate levels of oversight and meet their intended environmental objectives.



## JURISDICTION SUMMARIES— Progress in EPR during 2016



### British Columbia

Since EPR Canada's first report card in 2012, British Columbia (BC) has consistently "set the pace" for the rest of Canada in requiring producers to step up and take full responsibility for a full range of consumer products and packaging. It has been the only jurisdiction over the past six years to receive an overall A score from EPR Canada (in 2015). In May 2014, BC launched North America's first 100% EPR program through which producers assumed full financial and managerial responsibility for residential recycling of packaging and printed paper (PPP). Producers of printed paper have been given until this year, 2017, to submit a plan and come into compliance with the PPP regulation.

The past two years have been a period of consolidation for BC's 19 stewardship agencies, 22 ministry-approved product stewardship plans and the Ministry of the Environment's own regulatory oversight functions. Partly in response to the BC Auditor General's November 2016 "Overview of Recycling in BC" Report, BC has undertaken improvements through an assessment of performance measures across all EPR programs by reviewing and developing policy for competition in EPR programs and by developing stronger requirements for third-party assurance of annual reports for all EPR programs (including improving the quality of reporting by stewardship agencies on outcomes and recovery rates). In addition, the province is enhancing regulatory oversight of EPR programs and producers and by strengthening the Ministry's compliance and enforcement efforts including levying Administrative Monetary Penalties against "free-riders".

With the launch of Canada's only CCME Canada-wide Action Plan (CAP) Phase 2 material program for small and large appliances, BC's future attention will hopefully move on to other Phase 2 target materials – i.e. construction and demolition materials, furniture, textiles, carpet and ozone depleting substances. Looking even further down the road, it is hoped that BC will be the jurisdiction where progress to incentivize producers to better incorporate environmental considerations into the design of their products will be made. This continues to be an area of EPR policy where tangible progress is most needed.

### Alberta

Alberta does not have any EPR recycling programs. The province's five existing regulated recycling programs (tires, electronics, paint, used oil materials, beverage containers) are administered by delegated administrative organizations (DAOs) that are arms-length from government and are made up of a variety of stakeholder groups, including producers. They are enabled under the Environmental Protection and Enhancement Act. Alberta's stewardship programs perform well, but the provincial government does not officially endorse EPR as a policy instrument.



In 2013, Alberta Environment and Parks consulted with stakeholders on changes to the way designated materials are recycled in the province. This included enabling EPR in regulation and designating household hazardous waste and packaging and printed paper to be managed under EPR recycling programs. A decision on these proposed changes is still required and currently, decision makers are reviewing all department policy proposals relating to waste and/or recycling regulations.

Meanwhile, changes to existing recycling regulations that include removing fees from regulation and expanding used oil and electronics programs also remain underway.

## Saskatchewan

Saskatchewan consistently re-states its commitment to EPR but delivers the programs with only partial EPR approaches. EPR is implemented in a manner that sometimes includes partial government funding (e.g., for beverage containers) and often includes explicit social objectives (e.g., requiring that some EPR programs deliver social benefits such as employment and training for persons with disabilities).

In a significant move, Saskatchewan's Household Packaging and Stewardship Program, which was proclaimed in February 2013 finally launched in January 2016. Initially the program only obligated businesses with over \$5 million in revenue but in January 2017 this obligation was reduced to include businesses with \$2 million to \$5 million in annual revenue. The government is working on a compliance plan for enforcement for the program and the regulations include the measurement and tracking of greenhouse gas emissions.

Saskatchewan fulfilled its commitment to become the first Canadian province to use EPR to regulate agricultural plastics, with an initial focus on grain bags. The Regulations for the new Agricultural Plastics Recycling Program (APRP) were proclaimed on July 27, 2016 and the program is tentatively scheduled to be launched in January 2018.

The government's 2017 Solid Waste Management Strategy identifies the possible expansion of the waste electronics program and the development of a regulated household hazardous waste program. Also of note, in 2015, Saskatchewan re-used 80,385 litres of paint, reportedly making it the largest paint re-use program in the country.

Accountability weaknesses continue to limit the effectiveness of Saskatchewan's EPR initiatives. The province does not, for example, set specific performance targets for regulated materials. There is little opportunity to measure the non-diversion performance of programs (though the GHG inclusion for Multi-Material Stewardship Western is a positive new step) and there is no requirement for independent audits of data pertaining to a program's performance.





## Manitoba

Manitoba has performed well in the adoption and implementation of EPR and it continues its focus on the 12 existing programs developed and adopted under EPR legislation. Although no new products or materials were targeted in 2016, the oversight organization, Green Manitoba, continued to improve accountability for producer/program performance and transparency through a newly-developed program review process and a compliance management framework.

Although producers define program design and performance targets within approved plans, the province has established specific guidelines for each material/product designation. Manitoba's regulations have a unique requirement for each plan to include a section on how programs will service northern, remote and First Nations communities.

Almost all programs are administered and financed through producer responsibility organizations and are fully funded by participating industry stewards. The one major exception is packaging and printed paper (PPP) where costs are shared with municipalities (80% producers/20% municipalities) and programs are operated by municipalities.

Manitoba supplements its EPR and waste reduction policies through the Waste Reduction and Recycling Support Fund, which is financed through a disposal levy. This fund is open only to municipalities and local districts seeking to expand and/or improve their programs. Programs funded include organics, expanded hazardous wastes, pilot programs and research. The fund has become an important mechanism to further waste reduction initiatives.

New regulations targeting CCME Phase 2 materials would help the province expand beyond its first 12 programs. Unfortunately, no advances have been made on moving all programs to full individual producer responsibility where full program costs are funded by producers.



## Ontario

Although in 2002, Ontario became one of Canada's first provinces to introduce stewardship/producer responsibility legislation with the Waste Diversion Act (WDA), it has struggled to facilitate full and individual producer responsibility in the four regulated programs that it has put in place: packaging and printed paper (PPP) (Blue Box), scrap tires, waste electrical equipment and electronics (WEEE) and a limited list of household hazardous wastes. Ontario has also been slow to expand the list of designated products identified in the CCME's EPR Canada-wide Action Plan; however, it has developed resource tools to improve program performance and accountability.

After several false starts over the years, the shortcomings of the WDA – including its inability to transition to full and individual producer responsibility – were addressed with the repeal of the WDA and the adoption in November 2016 of the Waste Free Ontario Act that provides the necessary framework to wind-down existing programs and transition them to a new producer responsibility regime.

The Waste-Free Ontario Act, while establishing the re-structuring of EPR as a high priority, has also positioned EPR within the broader context of the green circular economy where EPR is seen as a policy tool capable of advancing resource efficiency and waste reduction. The



legislation has also adopted key elements from urban planning legislation that allow the issuance of provincial policy direction and the establishment of higher level objectives that go beyond what is typical of EPR such as: the reduction of wastes and greenhouse gas emissions including within the ICI sector; improvement of product/packaging design; the development of an organics strategy; and encouragement of markets and fair competition.

The Act also replaces Waste Diversion Ontario with the Resource Productivity and Recovery Authority which has responsibility to monitor and enforce compliance and issue prescribed penalties. It simplifies the process of designating new materials and products, and facilitates adding material management standards and assigning additional obligations that could be subject to penalty.

The new Act is an important advance with a more targeted producer responsibility framework and performance outcomes. The timelines for implementation of the EPR transition and the other elements of the waste free strategy are, however, relatively long. Transitioning the existing PPP program is, for example, not planned until 2022/23. Nonetheless, in 2016, the government had already issued its first direction to wind down Ontario Tire Stewardship and its program, an important first step toward transition of programs to the new regime.

## Quebec

Quebec's continued commitment and action on EPR is guided by the goals and objectives of the Residual Materials Management Policy and its 2011 – 2015 Action Plan. The goals and objectives of the Action Plan are implemented through the Regulation Respecting the Recovery and Reclamation of Products which, commencing in the fall of 2016, was being reviewed for possible amendments. The designation of new products and materials is done under the existing EPR framework and in September 2015 the province published a list of 24 priority products for management by EPR. In keeping with this commitment, in November 2016, the Minister announced that large household appliances would be regulated through an EPR approach.

Quebec is reviewing the option of giving the full operational responsibility for municipal packaging and printed paper programs to producers as has been done in British Columbia but no results of the review have yet been published and there is no public commitment to make the transition from the existing shared responsibility approach.

Quebec continues to have one of the largest lists of products and materials covered by EPR regulations in the country. In addition, the province has addressed costs associated with non-designated materials collected through municipal recycling programs and sharing those costs between municipalities and producer responsibility organizations. In support of its EPR programs, Quebec has undertaken several municipal waste and recycling characterization studies as well as a study of the provision by municipalities of recycling services for the industrial, commercial and institutional sectors.



In an innovative initiative, the province for the first time in 2016 accepted aboriginal communities as eligible under a municipal recycling compensation program which provides financial compensation for the operation of programs in these communities. Quebec continues to use administrative monetary sanctions to address program free-riders as a more effective response than time-consuming criminal charges.

Reporting on EPR program performance continues to be unsatisfactory and even basic information on tonnages recovered is limited or not available. Determining the performance of Quebec programs is therefore difficult if not impossible, particularly in the case of programs where confidentiality agreements have been signed with Recyc-Quebec. There have been no plans announced to address this issue.



## New Brunswick

In 2015, after some delay, New Brunswick finally adopted an EPR regulation for waste electrical and electronic equipment, launching a program in March 2017 similar to those already operating in most other provinces. EPR for printed paper and packaging (PPP) continues to be considered by Recycle New Brunswick with support from the province. New Brunswick along with all the other Atlantic provinces continues to operate with PPP recycling programs paid for almost entirely by municipal taxpayers without any producer responsibility or funding.

New Brunswick continues to have one of the lowest number of legislated EPR programs in the country and there has been no progress on transitioning currently operating stewardship programs, such as that for tires, to an EPR approach. In light of a history of a slow decision-making and implementation of the goals of the CCME Canada-wide Action Plan and no clear policy announcements, it is unclear whether any decision on a PPP EPR program is imminent and whether other materials covered by the CCME Action Plan will be put forward for management through EPR regulations in the near future.

It is notable that the province's Designated Materials Regulation, which mandates New Brunswick's EPR programs, requires that environmental handling fees (should brand owners choose to pass on these costs to the consumer) be integrated into the total advertised price of the product and into the sales price of the product on receipt of sale.



## Nova Scotia

In Nova Scotia, a voluntary program, managed through Nova Scotia Power, collects mercury containing lamps and thermostats and the province renewed an agreement with newspapers for 'in-kind' advertising to support municipal recycling programs.

Despite the completion of a consultation program launched in 2014 to discuss the possibilities of broadening the number of designated products identified for EPR and the consideration of the adoption of EPR framework legislation there has been little or no progress on EPR in Nova Scotia over the past two years. The consultation also addressed other policy questions such as disposal bans and expanding existing diversion programs but again no action appears to have taken place. Results of the consultation which indicated positive responses to

expansion of the scope of stewardship approaches including EPR, were released in the winter of 2015. As with all the other Atlantic provinces, municipal recycling programs for packaging and printed paper continue to be funded and operated entirely by municipalities without any industry support. Discussions about the possibility of implementing EPR or even a stewardship program to provide industry funding for municipal programs appear to have completely stalled.

## Prince Edward Island

Prince Edward Island has been active in establishing EPR programs in keeping with its commitment to the goals of the CCME Canada-wide Action Plan and now has 11 established programs in place including those for electronics, used oil, pharmaceuticals, lead acid batteries and mercury containing lamps and switches. EPR programs, stewardship programs and a province-wide mandatory source separation program have enabled Prince Edward Island to lead the nation in waste diversion, with an average of 429kg per capita. (Stats Canada, April 2017) Although not a regulated program, a memorandum of understanding has been signed with CleanFARMS to facilitate the collection and recycling of agricultural plastic.

Prince Edward Island is also working with industry on developing a program for mattresses and is in discussion with other provinces and industry to try to develop more programs including one for packaging and printed paper (PPP). Consideration of EPR for PPP has been on PEI's and other Atlantic provinces' agendas for several years but with very little movement to establish programs. The province is also planning to conduct a review of all existing EPR programs in 2018.

## Newfoundland and Labrador

The development of EPR programs in Newfoundland and Labrador seems to be stalled. No new EPR programs have been announced since the last EPR Canada report card (2014). The province has only two EPR programs in place – one for electronic waste and the other for paint, and these have been in operation for several years. This is one of the lowest number of programs of any province, and well short of the CCME Canada-wide Action Plan goals. Waste diversion programs or stewardship programs are in place for beverage containers, used oil, used tires and household hazardous waste.

The province does have framework regulations in place as guidance for future EPR programs and it could use this as a foundation for development of new programs. Discussions have been held with the other Atlantic provinces regarding PPP recycling programs and some other programs but no announcements have been made regarding implementation.



## The Territories



### Yukon

The Yukon Territorial government has completed updates to the Beverage Container Regulation to include milk products and milk substitutes. Updates to the Designated Materials Regulation will be implemented in February 2018, and will include surcharges on tires of all sizes and electronic and electrical products (including electronics such as computers, printers and display screens, as well as electrical products such as small appliances and microwaves). The Electronic Products Recycling Association (EPRA) will administer on behalf of the Yukon government the registration and collection of remittances for producers who supply new electrical and electronic products.



### Northwest Territories

The Government of the Northwest Territories' (GNWT) Department of Environment and Natural Resources (ENR) operates three regulated programs under the Waste Reduction and Recovery Act:

1. The Beverage Container Program (BCP), which also includes milk and milk substitute containers;
2. The Single-use Retail Bag Program (SRBP), which creates a source reduction incentive for retailers to avoid offering single-use retail bags to consumers; and
3. The Electronics Recycling Program (ERP), which includes computers, display devices, printers and peripherals, offering collection at recycling depots such as bottle depots.

While these programs are administered by government and not by producers, they are unique in Canada in that all government staff and resources dedicated to operating these programs are funded entirely by fees collected from consumers via producers for the designated product, and not by public funds.



### Nunavut

Waste management in Nunavut continues to be challenging and to a significant degree efforts in the north remain largely focused on improving basic waste management services through such means as improved standards and practices. Nunavut faces high barriers in implementing diversion programs and EPR, due to small remote populations and the cost of handling, storing and transporting waste, since communities depend on seasonal shipping and air transport.

## Canada

The federal government's support for EPR continued to be disappointing. Despite its stated support for the CCME Canada-wide Action Plan for EPR, Canada has not adopted EPR as an approach to manage any toxic substances or products containing toxic substances under the authority of the Canadian Environmental Protection Act (CEPA 1999), which it has the power to do. This is surprising as there appears to be an increasing awareness and concern regarding the challenges and need to manage toxic substances and products containing toxic substances at the end of their life. For example, the Canada/US International Joint Commission of which Environment Canada is a member is investigating concerns regarding the pathways by which toxic flame retardants used in products are entering the Great Lakes.

The lack of action is most clearly demonstrated in the case of the risk management of mercury containing lamps which have been promoted by the federal government for their energy efficiency but have entered the market without regulatory action to ensure safe and environmentally sound end-of-life management. Environment Canada has prepared guidance on the end-of-life management of such lamps but has not seen fit to ensure their proper collection and disposal through the adoption of federal EPR legislation. In the absence of any such action, a Private Member's bill (Darren Fisher, Bill C-238), which recently received royal assent, mandates the preparation of a national strategy for mercury containing lamps but does not specifically mandate producer responsibility or any EPR action.

The lack of any federal initiatives to effectively manage and regulate a demonstrable problem of national importance has led to some provincial action on mercury containing lamps but appears to signal an end to any consideration for the time being of use of EPR as a national regulated approach to toxic substances and products containing toxic substances.





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## What is EPR?

Extended producer responsibility (EPR) is defined by the Organization for Economic Co-operation and Development OECD<sup>1</sup> as an environmental policy approach in which a producer's responsibility, physical and/or financial, for a product is extended to the post-consumer stage of the product's life cycle. This approach is the basis for the [Canadian Council of Ministers of the Environment's \(CAP\) for EPR](#). The plan identifies two phases, the first comprising seven material groups and the second comprising five material groups that regulatory jurisdictions should target for EPR.

Under EPR, producers are responsible for designing, operating and paying for programs to manage the products and packaging they supply into the marketplace at end of life. Producers, described as brand owners, manufacturers and first importers assume responsibility when users put the designated products and materials into the program's collection system.

(For an explanation of the differences between EPR and product stewardship, please visit the [EPRC website](#).)

### ACKNOWLEDGEMENTS

*Thank you to the many federal, provincial and territorial officials and political leaders for your time and effort to participate in this important initiative over the past five years. EPR Canada is pleased that this venture gained recognition year-over-year. The members of EPR Canada look forward to watching how the adoption of EPR policies and programs across the country continue to position Canada as a world leader.*

*EPR Canada is especially grateful for the support of our sponsors. Without your help, it would not have been possible to publish our report cards and summaries. Thank you.*

*We would also like to express appreciation to the people who supported this effort each year: Jason Seale for help with the EPR Canada website; Bev Stone for graphic services and Pierre Cremer for translation services.*



<sup>1</sup> Organization for Economic Co-operation and Development Extended Producer Responsibility: A Guidance Manual for Governments, 2001 ([www.oecd.org/home/0,3675,en\\_2649\\_201185\\_1\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/home/0,3675,en_2649_201185_1_1_1_1_1,00.html))