

Gatineau, Québec  
K1A 0H3

September 5, 2013  
Secretariat of the Basel, Rotterdam and Stockholm Conventions  
International Environment House  
11-13 chemin des Anémones  
1219 Châtelaine (Geneva),  
Switzerland

**Subject: Guidance on the development of inventories: Methodological guide for hazardous waste inventories**

Dear Secretariat,

Canada is pleased to have the opportunity to submit comments on the draft *Methodological guide for the development of inventories of hazardous wastes and other wastes under the Basel Convention*. We understand the importance of national inventories to measure hazardous waste (HW) generation and the role that data from such inventories can play in directing efforts to reduce such generation.

Overall, we consider that this draft presents valuable information beneficial to countries' efforts in minimizing waste and meeting reporting requirements under the Basel Convention. However, the proposed approach may not be suitable to maintain large scale inventories and support national tracking and reporting in all circumstances. Facility-level inventories can serve different purposes but their compilation to build a national inventory is not always possible because of issues such as differing metrics, confidential business information and waste categorization. Such undertakings at a national scale can also be very costly.

In Canada, hazardous wastes are generated by a very wide range of facilities, activities and actors and there are strict requirements for their disposal. For this reason, we are currently piloting a different approach relying on a national census of waste processing and treatment facilities that is being administered by Statistics Canada. The cost effectiveness, results and accuracy of the targeted census will serve to inform decisions on future surveys of this kind and their periodicity. We hope to share our lessons learned on this initiative following completion in 2014.

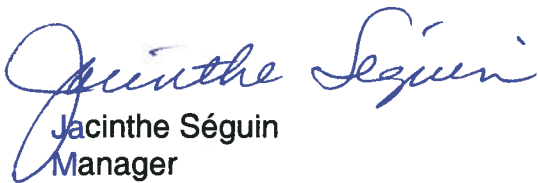
With regards to the contents of the draft guidance and the Canadian example cited in Annex 2 (*Case Study of and Inventory of End-of-Life Mercury Containing Lamps in Municipal Waste*), we would like to see this example removed. Even though this work was valuable and offers useful information, it is an example of a one-time study and does not contribute to a national inventory nor is it used as an ongoing monitoring instrument. We are concerned that using this case study in this document could mislead readers on the purpose and usefulness of such a study. Should you desire a more

pertinent Canadian example for the document, we would be pleased to provide one that will suit the purpose and intended audience of the document.

Finally, as a member of the Small Intersessional Working Group (SIWG) on national reporting, we see the opportunity for continued discussions on this topic and possible broadening of the focus of the document to include other methods which can be used for national level reporting on HW generation. The SIWG is well-placed to encourage the sharing of experiences and identifying challenges that both developed and developing countries are facing related to reporting of HW generation.

We trust that you will find our comments useful and we look forward to participating in subsequent work and discussion at the upcoming ninth meeting of the Open-Ended Working Group.

Yours sincerely,

A handwritten signature in blue ink that reads "Jacinthe Séguin". The signature is fluid and cursive, with the first letter of "J" being particularly large and stylized.

Jacinthe Séguin  
Manager

Waste Reduction and Management Division  
Environment Canada

c.c. Ms. Esther VanNes, First Secretary, Permanent Mission of Canada