



Saint-Jérôme, January 12, 2022

Environment and Climate Change Canada

infovehiculeetmoteur-vehicleandengineinfo@ec.gc.ca

Subject: Comments on the document entitled “Achieving a ZERO-EMISSION Future for Light-Duty Vehicles: Stakeholder Engagement Discussion Document, December 17”

Dear Sir or Madam:

ARPAC is proud to collaborate with Environment and Climate Change Canada to achieve its objective of a zero-emission future for light-duty vehicles, and is sharing with you its comments on the following question: “What end of life electric vehicle battery strategies need to be in place to support our environmental goals while achieving the one hundred percent zero-emission vehicle target (by 2035)?” on page 7 of the above-mentioned document, under the “Other considerations” section and the “Key Discussion Questions” subsection.

FIRST COMMENT:

To achieve the objective by 2035, we would need to properly inform Canadians that they do not need to worry about recycling the battery of their end-of-life electric vehicle, because for over 100 years in this country, our industry has been recycling in an environmentally friendly manner more than one million vehicles every year, including electric motor, fuel, diesel, propane gas, and soon, hydrogen-powered vehicles.

SECOND COMMENT:

Owners who want to dispose of their end-of-life electric vehicles in an environmentally friendly manner, whether they are individuals or companies, simply need to sell them and/or entrust them to a recycler, dismantler or vehicle recycling dealer that is a member of Automotive Recyclers of Canada (ARC), whose members, including ARPAC, are regularly audited to verify that they comply with the Canadian Automotive Recyclers Environmental Code (CAREC), as well as good practices for managing out-of-service vehicles.

THIRD COMMENT:

By identifying ARC and its members for the management of end-of-life electric vehicles, Canada ensures that 100% of their batteries will be adequately managed. The batteries will be inventoried and, if they are in good condition, will be sold for repairing vehicles of the same nature. They will be sold to companies specializing in the manufacturing of energy storage equipment. These companies will refurbish the batteries, if they are damaged or have cells to be replaced, which decreases performance. They will be sold to end-of-life battery recycling companies if they are not reusable.

FOURTH COMMENT:

To keep critical and strategic minerals as well as used original parts from used, damaged or end-of-life vehicles and their batteries within Canada, we suggest that the government impose a tax on buyers who export them. These replacement parts are essential for repairing Canadian vehicles that are damaged or involved in accidents. These parts and minerals are part of our country's circular economy.

Yours sincerely,

A handwritten signature in cursive script that reads "Simon Matte". The signature is written in black ink on a white background.

Simon Matte, President and CEO
On behalf of the Board of Directors

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