

- (8) We recommend that Environment Canada be provided the necessary funds to assist the relevant authorities in developing programs for the recovery and recycling of CFCs from commercial, household and mobile refrigeration systems that are to be scrapped or that have been previously abandoned. Once destruction technologies and less harmful substitutes are available, then the recovered, more harmful substances must be destroyed.**

Recycling of CFC Solvents

Some CFCs are in liquid form at room temperature and are used as solvents. Those should also be recycled until phased out. Industry is optimistic that replacements can be found for most solvent uses and should be encouraged to make these substitutions as rapidly as feasible. Until then, industry should be required to recycle CFCs employed as solvents, since the technology to do this is becoming available.

- (9) We recommend that the Canadian Council of Ministers of the Environment coordinate appropriate jurisdictions in the making of regulations for the recycling of CFCs used as solvents. When alternatives to solvent CFCs and destruction technologies are available, the CFCs must be recovered and destroyed.**

Technologies for Destruction

Ultimately, technologies will be required to destroy CFCs, halons, HCFCs, HFCs and related substances. The Committee is concerned that sufficient progress be made for their incineration or other means of destruction. We do not want to see problems of storage arise, as is the case for PCBs, particularly considering the volatility of some of these substances. Therefore:

- (10) We recommend that funding be provided by the federal government to assist the provinces and producing industries in developing the appropriate destruction technologies for CFCs, halons, HCFCs, HFCs and related substances. Once developed, the appropriate jurisdiction should make regulations for the destruction of these substances.**

Life Cycle Management

Proper management of the recovery, recycling and destruction of those substances presently in refrigeration units is essential, as is the complete "cradle-to-grave" management of new CFC production and of HCFC and HFC substitutes as they become commercially available. "Life-cycle" management of CFCs and their replacements need not involve overly cumbersome manifest systems for tracking these substances. In fact, only those substances used as solvents should be classified as hazardous wastes, not CFCs used as refrigerants. This point of clarification recently was made by the EPA in the U.S. (Federal Register Vol. 54, No. 144, 28 July 1989, pp. 3135-3137). The classification of CFCs and related substances in different jurisdictions should be the same to allow for national uniformity. There may be