

US EPA ARCHIVE DOCUMENT

**Important Alert and Recommendation for all US Exporters Currently Shipping SLABs to Canada for Recycling**

Environment Canada (EC) issues import permits to Canadian facilities receiving hazardous recyclable materials from other countries, like spent lead-acid batteries (SLABs). When the materials are hazardous in the U.S., EC coordinates its reviews of the export notice from the U.S. exporter that is forwarded by the U.S. Environmental Protection Agency (EPA) and the import notice from the Canadian receiving facility so that the approved period of import for the Canadian site and the approved period of export for the U.S. exporter are the same. When U.S. export notices are not required, EC reviews the import notice from the Canadian receiving facility only and issues an import permit as appropriate.

In past years, U.S. exporters of intact SLABs managed under 40 CFR Part 266 Subpart G were not required under those regulations to submit export notices and receive consent prior to export. **Because U.S. exports of intact SLABs to Canada for recycling will be prohibited starting on July 7, 2010 unless the new notice and consent process is completed, EPA is encouraging SLAB exporters to submit their export notices by early May or sooner if possible.** To facilitate a smooth transition for both countries, EPA and EC are encouraging U.S. exporters and the Canadian receiving facilities to use one of the following options when the Canadian facility has an active import permit from EC:

**Option 1**

- U.S. exporter submits an export notice to EPA, referencing the Canadian notice number for the corresponding Canadian import notice (if available).
- At the same time, the Canadian receiving facility submits a new import notice to EC.
- EC will coordinate its reviews of both notices and specify identical approval periods for the export and the import as appropriate, usually for the maximum allowable period (twelve months).

**Option 2**

- U.S. exporter submits an export notice to EPA and provides the notice number issued by EC to the Canadian facility.
- EC will use the import notice number to expedite its review and provide its consent for the remaining approved period of import permit.

Because both EC and EPA require submission of notices at least sixty (60) days before the desired start date for shipments, we strongly recommend Option 1 if the Canadian facility's import permit will be expiring before October 2010, or if the U.S. exporter wishes to obtain the maximum possible approved period of export. Option 2 will probably result in a quicker approval, but for a shorter time period. Absent a new import notice submission by the Canadian facility (Option 1), it is likely that EC will provide consent only for the remaining approved period of import (like in Option 2) even if the export notice submitted to EPA asks for twelve months.