



# BRITISH COLUMBIA PRODUCT STEWARDSHIP COUNCIL

2007.01.17

Mr. H. Lee Scott, Jr.  
President and Chief Executive Officer  
Wal-Mart Stores, Inc.  
Bentonville, AR 72716-8611  
USA

Dear Mr. Scott,

It has come to the attention of the British Columbia Product Stewardship Council (BCPSC) that Wal-Mart is embarking on an initiative to market 100 million energy efficient compact fluorescent light bulbs (CFLs) in 2007. The implicit message that an enterprise of your scope intends to have a positive effect on the environment by mitigating climate change is most welcome and you are to be congratulated.

However, like our colleagues in the Northwest and California Product Stewardship Councils, we in British Columbia believe that your responsibility for those 100 million CFLs does not end when they leave the stores. The fact that each of those bulbs contains a small amount of mercury, a potent and persistent neurotoxin, means that a program must be established to manage end-of-life units in an environmentally secure system. To ensure that these light bulbs do not create a new environmental problem when they are disposed of, we urge Wal-Mart and the suppliers of the product to work together to create an alternative to landfill or incinerator disposal.

By way of introduction, the BCPSC is an organization made up of staff from British Columbia's regional governments who have responsibility for waste management. It is our intent to ensure that British Columbia's Recycling Regulation is expanded to include industry operated and funded programs for the management of all end-of-life products similar to those that already exist here for paint, solvents, pesticides, automobile batteries, pharmaceuticals, beverage containers, tires, used motor oil, oil filters and some electronics.

Although the most straight forward means of dealing with this potential problem would be for you to accept CFLs back at your many stores, in British Columbia the mechanism exists for Wal-Mart, other retailers and the manufacturers to ask the provincial government to create a schedule in the Recycling Regulation requiring industry led management of this product. This approach has the advantage of creating a level playing field for all industry participants and ensuring access to return locations for all residents.

We would be pleased to work with you to promote appropriate end-of-life management of compact fluorescent lights. We look forward to hearing about your plans to address this matter.

Sincerely,

Raymond Gaudart and Monica Kosmak,  
Co-Chairs