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Dear Ms Fotheringham and To Whom it May Concern at Hydro One,

## Re: Missed Opportunity in the *Light it Right: Your whole-home guide to LED bulbs* Brochure to Hydro One Customers

As a Hydro One customer residing in Lindsay, last week I received the above-captioned brochure with my electricity bill. I was delighted to see this information about LED bulbs provided in a helpful and engaging format.

However, in this otherwise exemplary brochure, it was extremely disappointing to see that the section entitled "The LED advantage" (see attached scan) notes one such advantage being "Don't contain mercury" with no further explanatory information. Your communications department will be well aware that it was electric utilities such as Hydro One and likely most electric utilities across Ontario that for many years aggressively encouraged the adoption of mercury-containing CFLs. It is a significant oversight and missed opportunity for your outreach materials to now ignore the need to encourage proper disposal of these bulbs as hazardous waste.

We recognize and strongly encourage the gradual replacement of CFLs with the even more energy efficient LED technology. However, for the foreseeable future, there is a serious problem with inadequate disposal/recycling of CFLs including significant risks associated with mercury exposure when CFLs are broken in the home. Immediate and concerted action is needed to address this important source of mercury exposure so that proper disposal occurs across the next 5 to 10 years as this technology shifts.

We also recognize that regulatory action has been taken to reduce the mercury content of CFLs and diverse outreach activities seek to warn Canadians about the need for safe disposal and health risks associated with broken CFLs. However, despite the fact that the amount of mercury in CFLs is a small proportion of overall mercury emissions, when CFLs are broken during

shipping, handling, retailing, use, disposal and/or recycling, the resulting mercury vapour is in direct contact with people. The neurodevelopmental risks of this direct exposure are greatest for the developing fetus and child, and the consequences are lifelong. Millions of these products are sold and used across Canada, yet in our experience the current efforts to educate the public on the risks and protective measures are not yet widely effective. For many years our outreach work with parents and service providers who work with families has shown that people are often are unfamiliar with the mercury risk associated with CFLs and are unaware of how to reduce exposures in the event of a broken bulb.

We therefore strongly encourage Hydro One, and all local distribution companies with whom the IESO communicates, to ensure that any public outreach materials and associated websites promoting LEDs also include a much more responsible message about the older mercury-containing bulbs than is provided in the "Light it Right" brochure. There are many on-line locations that summarize this messaging including:

- Health Canada The safety of compact fluorescent lamps: <a href="http://healthycanadians.gc.ca/security-securite/radiation/devices-dispositifs/consumer-consommateur/cfl-afc-eng.php">http://healthycanadians.gc.ca/security-securite/radiation/devices-dispositifs/consumer-consommateur/cfl-afc-eng.php</a>
- Ecoparent.ca Mercury hazards in compact fluorescent lightbulbs. Dangers explained and what you need to know: <a href="http://www.ecoparent.ca/environment/mercury-hazards-compact-fluorescent-lightbulbs">http://www.ecoparent.ca/environment/mercury-hazards-compact-fluorescent-lightbulbs</a>
- Canadian Partnership for Children's Health and Environment What do I do if a compact fluorescent bulb (CFL) breaks?: <a href="http://www.healthyenvironmentforkids.ca/qa/compact-fluorescent-lightbulbs-cfls">http://www.healthyenvironmentforkids.ca/qa/compact-fluorescent-lightbulbs-cfls</a>

The Hydro One website states with respect to a commitment to "doing the right thing" that:

\*Running our business in a socially responsible way is part of Hydro One's mission and vision. (http://www.hydroone.com/OurCommitment/Pages/default.aspx)

We submit that such social responsibility includes providing important messages about environmental safety including "doing the right thing" to ensure Hydro One customers are provided with good information about responsible handling of CFL bulbs, the use and marketing of which Hydro One spent many years actively encouraging. Given the unfortunate situation of widespread lack of awareness about mercury risks in CFLs, educational messages need to occur via multiple pathways. An information brochure sent to all Hydro One customers is an ideal communications tool. Please advise on whether you are able to both correct the *Light it Right* brochure and expand your communications messaging in this area.

Yours very truly,

## CANADIAN ENVIRONMENTAL LAW ASSOCIATION

Kathleen Cooper, Senior Researcher

