

**Summary Report:
Consultation Sessions on Achieving
Ontario's 60% Waste Diversion Goal**


June 18 - July 13, 2004

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Ontario Ministry of the Environment

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SUMMARY REPORT: CONSULTATION SESSIONS ON ACHIEVING ONTARIO'S 60% WASTE DIVERSION GOAL

On April 5, 2004, Environment Minister Leona Dombrowsky announced the government's intention to develop a strategy for Ontario that would divert 60 per cent of the province's waste from disposal by 2008. The announcement included a commitment to release a discussion paper on possible approaches to achieving the goal.

To that end, on June 10, 2004 the Ministry of the Environment released *Ontario's 60% Waste Diversion Goal: A discussion paper* for public consultation.

Six public forums were held across the province in June. A wide range of stakeholders were invited to attend, including municipalities, the waste management industry, the industrial, commercial and institutional sector, the construction industry, environmental and community groups, associations and the general public.

Sessions took place in:

- Kingston, June 18, 28 attendees
- London, June 21, 34 attendees
- Thunder Bay, June 23, 9 attendees
- Sudbury, June 24, 14 attendees
- Toronto, June 28 and 29, 54 attendees

The vast majority of participants were from the industrial, commercial and institutional (IC&I) sector or municipal government. A small number (eight) were interested citizens.

Participants at each session were separated into small round table discussion groups varying in size from seven to 12, and guided through nine topic areas by a facilitator. The nine topics discussed were:

- 1) Setting province-wide waste diversion objectives and targets
- 2) Accelerating centralized composting for residential waste
- 3) Feasibility of phasing-in a ban on disposal of key organics and recyclable materials
- 4) Developing a financing strategy for increased waste diversion, including centralized composting for residential waste
- 5) Industrial, commercial and institutional waste diversion: a renewed commitment
- 6) Reducing packaging and increasing the recycled content in products and packaging
- 7) Finding new waste diversion technologies
- 8) Expanding public education and awareness activities to promote 3Rs (Reduce, Reuse, Recycle)
- 9) Initiating a province-wide monitoring system for waste

One additional session was held in Toronto on July 13, 2004 with industry representatives and their associations. The Ministry of Economic Development and Trade hosted the session.

The consultations were successful at gathering many ideas on Ontario's goal for 60% waste diversion by 2008.

Input received from stakeholders during the consultation sessions are contained in this report.

The summary lists the recurring themes heard from stakeholders. Appendix 1 contains an expanded list of key comments/themes heard, while Appendix 2 lists all comments received on two questions posed to participants on each of the nine topic areas. Appendix 3 contains comments received from the Ministry of Economic Development and Trade's July 13 session.

SUMMARY

Following are the recurring themes heard from stakeholders during the consultation sessions:

- **It is essential for the province to take a strong leadership role in this initiative.**

This was a recurring theme throughout the consultations. The majority of the participants felt there must be a strong, visible commitment from the government on achieving this goal, in order for stakeholders and the public to participate. Many suggested that the government directly address the issue through its procurement policies by incorporating requirements that support the 60% diversion goal and buying products that are environmentally friendly. The importance of the province's role was also stressed in matters of finance, education, and enforcement.

- **There was overall support for the 60% waste diversion target, but differing views on what the target should entail and how to get there.**

The majority of participants felt that 60% was a desirable, obtainable and manageable target. There were, however, divergent opinions on this topic, with some expressing the view that the province should strive for 100% diversion, and others who felt 60% was too high by 2008. The balance of opinion, however, was that 60% made sense as a target – it is both challenging enough to be commendable and attainable enough not to be discouraging.

Some believed that mandatory targets were needed to spur industry and the public to reduce their waste. Others had concerns with the reality of meeting this goal by 2008. Several individuals stressed the need to have the infrastructure in place to deal with the waste diversion materials before any specific targets can be established. Others believed the goal might not be feasible for small and rural Ontario; suggestions to deal with this included setting targets based on population, or being even more sophisticated, and basing targets on population density.

There was a great deal of debate about the merits of including the IC&I sector in the overall target. Opinions were divided on the merits of undertaking such a large endeavour, but most felt it was vital to include this important sector. Another significant issue for people was how reduction and reuse programs could be factored into the overall goal. Most recognized that there was no simple solution to this issue. Some of the other suggestions that arose during the consultations included: the importance of setting separate waste diversion targets for smaller communities and ensuring that an adequate source separation program is in place.

- **The government should consider different strategies for northern and southern Ontario.**

Although many participants thought the idea of increasing waste diversion was admirable in principle, some, especially those in Thunder Bay and Sudbury, were concerned about implementation feasibility in northern Ontario. They felt that the Ministry's discussion paper did not adequately address the unique needs and local circumstances of northern communities.

A primary concern related to the long distances to adequate markets and processing facilities for diverted materials and the resulting transportation costs. There was also concern that markets in the north are simply too immature for a mandatory program. Also highlighted were the difficulties in promoting composting because of bears and odor concerns, plus the fact that disposal is currently less expensive than recycling.

- **Opinions differed on whether centralized composting is necessary.**

There are many differing views on centralized composting and the ultimate cost effectiveness of this undertaking. Some felt that having a centralized site was not going to be of value for all municipalities, while others believed there are smaller municipalities doing a very good job on total diversion and that this is a logical next step. Some believed it was important to have regional composting and suggested the use of a compost-shed approach – similar to a water-shed approach for water issues.

Some participants in the northern consultations – like those in southern Ontario – felt that backyard composting was important and should be better promoted before proceeding to centralized composting programs. Some in the north, however, expressed concerns about composting activity attracting bears into residential neighborhoods. Some participants in the Toronto sessions, however, were concerned that backyard composters would not work in an urban setting because for many, especially the multi-residential dwellers, it's not very practical.

Several felt that without viable markets the government was “putting the cart before the horse” by promoting centralized composting programs. Others cautioned that the government must take illegal dumping into consideration as it might become a problem if a mandatory program is put in place prematurely. Finally, some groups felt that it was important for the municipalities to work together to establish composting sites that could be shared with several areas although some expressed concerns for how this would work in smaller or more northern municipalities. Overall, the balance of opinion seemed to conclude that centralized composting can be very effective in many communities, but needs to be considered on a case-by-case basis to determine feasibility and cost effectiveness.

- **A multi-faceted financing strategy is most appropriate.**

The topic of developing financing strategies for waste diversion and in particular, centralized composting, often generated the most discussion during the six consultation sessions. Many participants believed that rather than just one financing strategy, it is important for the government to consider a multi-pronged approach. A few of the municipal representatives felt it would be hard to sell an increase in taxes to municipal taxpayers because they are already paying quite a bit for their services. The north was really concerned about financing – especially if targets were mandatory. Many wanted to see the government provide capital funding up front in order to build the infrastructure that is necessary to realistically meet the 60% goal.

Some of the other ideas that were suggested included:

- setting bag limits;
- treating waste as a utility and establishing a separate bill for it;
- offering incentives for manufacturers that make environmentally friendly products; and,
- establishing a province-wide landfill surcharge, with collected fees dedicated to waste diversion programs.

The greatest level of consensus was around the topic of user fees. Many of the participants believed that having a user pay system was important to achieving the goal. They felt people are not going to take waste diversion seriously unless there is a cost involved.

- **Multi-pronged education and awareness initiatives are essential to promoting waste diversion.**

Many of the groups at each of the sessions felt that educating the public will be a critical component of the process. It is one of the essential pieces to achieving the goal. Many suggested that a two-prong approach is required with the Province responsible for overall promotion of the concept of diversion, and the municipalities and industry responsible for the how-to aspects of diversion within their local programs or relating to their specific products and goods. Several individuals believed that targeting the youth market as well as the adult population was a useful strategy. Some people believed that in order to achieve the 60% goal it was important to sell environmental stewardship to the public as a source of pride. There was strong support for having promotion of the 3R regulations as part of a province-wide school curriculum at all grade levels.

- **Enforcement is a key to reaching 60% waste diversion.**

Many believed that without improved and visible enforcement, reaching any form of a diversion target was not going to be achievable. Some also felt the current regulations are not being enforced. More specifically, they would like to see the province enforce the existing 3Rs regulations before any new ones are established. Without better enforcement policies by the province, achieving the 60% target would be difficult. Enforcement was for the most part viewed as a provincial responsibility that is currently lacking.

- **Monitoring and reporting necessary but difficult.**

Many of the participants had diverging views on reporting; some felt it should be done at the generator level, while others believed it should be done at the landfills. However, a common view that did surface during the discussions was that any data being collected must be used to ensure that this is not just a cost and burden that turns out to be an exercise in futility. There was not a lot of heated debate on how this was to be accomplished, but there was general understanding and agreement that monitoring and reporting of data was fundamental to measuring performance in attaining the government's 60% waste diversion goal.

Industry's View (MEDT-Hosted Session)

- Industry supports a results-based approach, but it does not support bans, financial surcharges or regulatory requirements that do not have sound environmental benefits or are economically inefficient. It would also support an incentive-based approach.
- Industry is strongly in favour of including energy-from-waste as a diversion method.
- The waste diversion strategy will require cultural changes that will not be complete until beyond the 2008 target.

Appendix 1: Synopsis of Key Comments/Themes

Discussion Paper Topic	Key Comments/ Themes	Other Ideas/Suggestions
<p>1. Setting Province-Wide Waste Diversion Objectives and Targets</p> <ul style="list-style-type: none"> ▶ Set mandatory waste diversion targets for municipalities, varying by size of population. ▶ Require public reporting of waste diversion rates by certain businesses. ▶ Review and enforce more consistently diversion regulations for IC&I sectors. 	<ul style="list-style-type: none"> • Most felt 60% was a commendable goal and achievable. • Much of the IC&I sector questioned the feasibility of the time frame of 2008, and requested more information on the specifics of the actual plan. • North/south issues to be considered e.g. distance to markets (N), challenges of multi-family units (S). • There was a mixed reaction to public reporting. • Better enforcement of existing regulations is needed across-the-board • Companies are not given credit for the reduction and reuse they do, which may be significant – i.e. waste diversion doesn't give the whole picture • Need a clear definition of waste diversion and what is in/out • Will municipalities' targets include IC&I diversion? • What penalties could be applied if targets are mandatory for municipalities? 	<ul style="list-style-type: none"> • Are there advantages to a regional approach to setting targets and other requirements? • There needs to be provincial leadership to set a positive example and to motivate other sectors i.e. green procurement, better enforcement, financing, education. • Provincially mandated bag limits, use of clear bags, or bag tags may motivate people to divert waste.
<p>2. Accelerating Centralized Composting</p> <ul style="list-style-type: none"> ▶ Continue to support and encourage backyard composting. ▶ Implement increased residential organic waste collection and centralized composting in Ontario's largest municipalities. 	<ul style="list-style-type: none"> • Backyard composting works well and should be supported and encouraged. • There needs to be a regional composting plan, an overall Ontario "compost shed" plan. • Public education is critical. • Province needs to address problems of pests (bears in North, rodents/raccoons in South). • Population distribution makes it expensive to collect curbside in many rural and northern communities. • There needs to be a clear definition of organics. • Contamination is a problem, therefore better source separation is needed. 	<ul style="list-style-type: none"> • There are composting concerns / opportunities in the private sector. • Tap into grass roots networks and already existing programs like the master composter program. • Harmonization with CCME guidelines will increase composting. • Review approval requirements for composting facilities i.e. speed up the process.
<p>3. Feasibility of Phasing-in a Ban on Disposal of Organics and Recyclable Materials</p> <ul style="list-style-type: none"> ▶ Phasing in a ban on the disposal of key organics and recyclables from disposal 	<ul style="list-style-type: none"> • First develop a market, or have viable alternatives, before a ban is put in place. • How will organics be defined? • How will a ban be enforced? • Ensure that illegal dumping is addressed. • Take geography into consideration, a ban may not work in orthern Ontario. • Multi-residential buildings are a challenge. 	<ul style="list-style-type: none"> • Is there a legislative method to ensure that there is consistency between public/private landfills to ensure that if materials are banned, private sites don't pick up the business? • Use clear bags for enforcement at the curb.
Discussion Paper Topic	Key Comments / Themes	Other Ideas/Suggestions

<p>4. Developing a Financing Strategy for Increased Waste Diversion, including Centralized Composting for Residential Waste</p> <ul style="list-style-type: none"> ▶ Make available a range of financing options for creating new waste diversion programs and infrastructure that includes consideration of the following components: <ul style="list-style-type: none"> • user pay; • provincial funding; • municipal financing through borrowing; • a provincial waste disposal surcharge; • private sector investment; • revenues from new markets for recycled materials; • designation of new wastes for which Waste Diversion Ontario must develop waste diversion programs. 	<ul style="list-style-type: none"> • The province should take an active role in developing a funding formula. • It is unfair for municipalities to have to cover all costs. • A provincial requirement for user-pay had broad support, as this would make local politicians put the system in place (political reasons why user pay not implemented in all municipalities). • There is little support for municipal borrowing. • There are implementation concerns with waste disposal surcharge i.e. some landfills don't have scales. • Increasing materials designated under WDO is viewed positively by the public, NGOs and municipalities, but not by IC&I companies. • Develop a market for new materials and develop existing markets before new materials are designated or new requirements are put in place. • If money is collected by the province through a surcharge or other fee, ensure that it is put into a dedicated green fund (not general revenue) 	<ul style="list-style-type: none"> • Charge for waste as a utility. • Adequate enforcement is needed so that municipalities don't cheat or alter their numbers for more funding. • Use clear bags and/or bag limits. • Perhaps the province can subsidize recycling of materials that are expensive to recycle (i.e. styrofoam) until a market is established.
<p>5. Industrial, Commercial and Institutional Waste Diversion: A Renewed Commitment</p> <ul style="list-style-type: none"> ▶ Review and revise Ontario Regulation 103/94 to reflect a renewed commitment to IC&I waste diversion. ▶ Require the largest waste generators to publicly report their waste diversion rates. ▶ Phase in public reporting of waste diversion by other waste generators on a sector-by-sector basis. ▶ Provide training to small businesses to help them increase their waste diversion rates. 	<ul style="list-style-type: none"> • How can businesses get credit for using recycled content, and for other waste reduction efforts? • There is general support for reviewing and revising all waste and recycling regulations. • Although there are concerns about confidentiality and business competitiveness, there is general support for public reporting if it is phased-in. • Consider aggregate reporting by sector. • Training for small businesses is a good idea. • Better enforcement of existing regulations is needed. 	<ul style="list-style-type: none"> • What is the feasibility of letting the sectors select their own waste streams as opposed to mandatory materials? • What else can be recycled and are there available markets? • Is it feasible to focus on paper where there is a market demand and potential for great gains? • There needs to be provincial leadership to set a positive example and to motivate other sectors i.e. through green procurement, better enforcement, financing, and education. • Link reporting to already existing reports such as NPRI or StatsCan.

Discussion Paper Topic	Key Comments/ Themes	Other Ideas/Suggestions
6. Finding New Waste Diversion	<ul style="list-style-type: none"> • Clarification and streamlining are good ideas, but the province needs to ensure 	<ul style="list-style-type: none"> • What opportunities are there for municipalities to share

Discussion Paper Topic	Key Comments/ Themes	Other Ideas/Suggestions
<p>Technologies</p> <ul style="list-style-type: none"> ▶ Streamline the approvals process under the <i>Environmental Protection Act</i> (EPA). ▶ Clarify the ‘research’ exemption in Ontario Regulation 334, ensuring that small scale research or demonstration projects for new waste diversion technologies are not subject to the <i>Environmental Assessment Act</i> (EAA). 	<p>that the environment is protected.</p> <ul style="list-style-type: none"> • Approvals process needs to be timely and less onerous to applicants. • There needs to be a better balance between the EA process and approvals. • Create one single window at the local level for approvals/CofAs. • If Energy-from-Waste is considered a disposal technology, there aren’t any new waste diversion technologies. • Focus on existing technologies that work. 	<p>technology/equipment?</p> <ul style="list-style-type: none"> • What is the feasibility of a Centre of Excellence or a central provincially run approval facility? • Could the government sponsor a ‘provincial challenge’ to universities and colleges to develop innovative waste diversion technologies? • Re-examine incineration as an option for waste disposal. • Streamline diversion, for example breakdown mattresses, furniture, grind tires before shipping, use shingles in road materials. • Share/rotate equipment (such as grinders) among municipalities.
<p>7. Reducing Packaging and Increasing the Recycled Content in Products and Packaging</p> <ul style="list-style-type: none"> ▶ Improve programs designed to reduce packaging and increase recycled content of products through working with other levels of government. ▶ Disseminate information on best practices in packaging reduction, reuse and recycling. 	<ul style="list-style-type: none"> • Could this also refer to ‘Increasing the Recyclability of Products and Packaging’? • What opportunities exist to work with the federal government? • What opportunities are there for ‘take-back’ programs? • Consumers need incentives i.e. through a deposit return system. • Are there mandatory requirements for retailers to do their share e.g. recycling boxboard? Fast food chains e.g. Tim Horton’s are a concern. • Over-size packaging used as a marketing ploy (visibility) as well as anti-theft measure – how can these concerns be addressed? • What are the concerns given we are a global market? • Can a life cycle analysis of products/packaging be required? 	<ul style="list-style-type: none"> • Are municipalities funded for collection of all potential recyclables, even if there isn’t a market for them e.g. #7 plastics? • IC&I concerns that manufacturers whose products go to the blue box are paying more than those whose products go to disposal. • Consider alternative packaging. • Reduce plastic bag use. • Mandate reduction in packaging or revisit program from late 90’s that addressed packaging reduction. • Implement a surcharge on non-recyclable packaging.
<p>8. Expanding Public Education and Awareness Activities to Promote the 3Rs</p> <ul style="list-style-type: none"> ▶ Work with stakeholders to deliver effective public education on the 3Rs. 	<ul style="list-style-type: none"> • Educating the public is a critical component – it is essential to achieving the 60% goal. • There is confusion on what can/can’t be recycled. • Target the youth and integrate waste diversion into the education system, i.e. make it a part of the curriculum. • Partner with the Ministry of Education. • Work with teachers, because they teach children, who will teach their parents. • TV is seen as the best method of advertising. • Not just raising awareness, generators need to change their behaviour. • People don’t understand their impact on the environment. 	<ul style="list-style-type: none"> • There needs to be provincial leadership to set a positive example and to motivate other sectors. • Sell the provincial policy on waste diversion to the public as a source of pride. • Don’t forget to educate new Ontarians and companies.

Discussion Paper Topic	Key Comments/ Themes	Other Ideas/Suggestions
<p>9. Initiating a Province-wide Monitoring System for Waste</p> <p>► Require all waste generators in the municipal and IC&I sectors and waste site operators to report waste diversion statistics, including quantities of waste disposed and diverted.</p>	<ul style="list-style-type: none"> • Stakeholders agreed a monitoring system is needed to measure 60%, however they want to: <ul style="list-style-type: none"> ○ Use systems that are already in place, if possible; ○ Use one-window reporting to minimize burden on business; ○ Be aware of confidentiality and business competitiveness factors; ○ Keep information to be reported simple to what will meet the government's needs as a performance measurement; ○ Reduce the burden on reporters; and ○ Ensure adequately enforced and everyone using the same measurement. • How would a waste collector who picks up loads from several municipalities/ IC&I accurately report source (i.e. they don't weight at each stop)? • Not at all landfill sites have scales. • Reg. 103 waste audits may be a vehicle for acquiring information. 	<ul style="list-style-type: none"> • Report by sector, transfer station, or other method. • MNR has unsupervised landfill sites – how will these be treated? • How do you account for what doesn't get to curb e.g. back yard composting, home reuse, thrift store donations, etc.? • Reward/recognize good behaviour.

Appendix 2: Responses to Two Key Questions

For each of the nine topics contained in the discussion paper, attendees at the consultation sessions were asked two questions:

- 1) What are the key implementation considerations and challenges?
- 2) Are there other actions the government should consider in relation to this topic?

1. SETTING PROVINCE-WIDE WASTE DIVERSION OBJECTIVES AND TARGETS

Key Implementation Considerations and Challenges:

- targets are important because they will drive the process – they are a trigger for industries/municipalities and they encourage people to do better.
- It's important to set goals but how will it be measured?
- 60% should be linked to municipal size.
- Source separation at the curb is the key – could eliminate cost of people at the landfill having to monitor what's coming in
- Municipal target should not exclude IC&I
- Diversion targets should recognize IC&I's previous progress in reductions under 3R Regs
- 60% should be provincial average
- Why set goal of 60% - should strive for 100%
- Incremental setting is more realistic instead of setting an unachievable target
- Need more focused targets – 1. Reduction target 2. Waste diversion target and 3. Toxicity target
- Would like to see another step to setting a new target (think beyond 2008) – don't just stop once 60% is achieved
- 2008 not realistic target date
- Need to focus on reduction instead of focusing on magic ways to get rid of waste
- Focus on root cause of waste and where it's coming from
- Lack of national packaging standards make achieving 60% more difficult
- Provincial leadership needed in harmonizing packaging and diversion as well as on ensuring infrastructure is in place for cost effective recycling
- Have a standard diversion program across the board – level playing field between sectors
- Need enforcement of policies for 3R regulations that province already has in place – some industries may not be aware of the 3Rs because they are not enforced on a regular basis
- Don't just focus on larger municipalities – smaller municipalities also need to be considered
- Must manage cost escalation – industry shouldn't just keep paying and paying
- Some industries already acting as good corporate citizens and doing their part in diversion
- Mandatory programs drive people to find alternatives (such as roadside disposal), that might not be a good thing

- External trade/market demand impact on packaging decisions, may complicate setting objective/targets on companies
- Keep end uses of packaging/product in mind
- Need analysis on who suffers if we don't achieve 60% and what are the consequences?
- MOE should be responsible for enforcement
- Distance to markets can be a factor on what can be done, particularly in the North
- Why can't other options like EFW be part of this?
- Setting targets without ways to manage it doesn't make sense
- Cost benefit analysis needed
- Reporting may be duplicating or redundant – What will the impact of the additional reporting requirements be? Will the value of the added resources be worth it? Who's going to verify that the numbers are truthful?
- Industry already has to report – streamline/harmonize this requirement
- Recognize need for better IC&I data
- “Orillia” not following their own C of A established in 1990 – in theory it sounds great but it needs to be practiced (follow through/enforce)
- Educate, motivate, legislate, and enforce – treat as a package – can't send ZWAT (Zero Waste Administration Team) in if others aren't in place
- Clear definition required including how by-products of production are captured
- How will residential waste be defined?
- Many problems with multi-residential participation/collection – Storage capacity, landlord resistance to make changes, information dissemination
- Many municipalities already trying to increase diversion, don't need to be mandated
- New waste diversion streams can be costly and require finishing markets
- Need to ensure data is reported consistently and is a true reflection of the diversion
- Separate targets – one for single family and one for multifamily
- Targets established based on materials themselves
- At source, reduction not recognized
- First 2Rs not mentioned
- Monitoring a concern
- Municipalities receive IC&I materials/waste
- Need the opportunity to divert and find uses in all sectors
- Doesn't always make sense to reuse – throwing something out before it's life is over is sometimes OK – reuse not appropriate strategy for all products
- Proper stewardship is key
- Can't have unsustainable costs
- Don't have a problem with overall objective – don't think it's reasonable to have a “one size fits all approach” though
- What's the optimum number of recycling facilities across the province – municipalities have to work together/economic synergies
- Need to look at what can go into the landfill that won't cause environmental problems
- Too fixed on what's being diverted, and not on what's going to landfill
- Enormous pressure on municipalities already – monitoring to death
- More of a materials management issue than a garbage issue
- Look at per capita reduction

- Consider geography (distance to markets) – can't compare northern to southern Ontario – most people want to do it, but the 60% is harder to achieve in northern Ontario mainly because of the cost both for transportation and capital infrastructure – quite often it's easier to make money on trash
- Need to find markets (find another use) - if the markets aren't there, there is no point in collecting it.
- Start at source (manufacturers should have to pay a fee/take responsibility)
- Biggest expense is transportation
- Lack of competition – municipalities competing for same business
- Need to see a return on investment
- Confusion in plastics recycling numbers makes it hard to achieve greater diversion of plastics
- Too hard to work together in the North - province needs to run the dumps
- How do we define recycling so that it's measurable industry wide?
- Looking for best practices models
- Cost to hire contractors is expensive
- Provincial regulations easier to enforce than municipal by-laws
- Hard to sell increase in taxes to municipal taxpayers
- Concerned about province mandating a target unless they are willing to provide funding
- Need to work on changing people's attitudes (culture change)
- What do we do with materials once we've saved them?
- Tourist resorts create a lot of waste (almost as if they feel they are entitled to because they pay the big taxes) another problem with tourist resorts is cardboard – no market for cardboard and therefore it's going into the landfills
- Timmins has a four bag rule in winter and two bag rule in the summer
- “Weight” alone not right measuring tool
- Municipalities need help from province – instead of demanding a 60% target, education on how to successfully divert materials from landfill
- Wildlife i.e. the bears attracted to central composting sites and landfill
- Apartment building storing and sorting a challenge
- Should apply to everyone including IC&I, if not than it shouldn't apply to anyone
- C&D waste needs to be included
- Bio-solids should be included
- Government needs to be cautious about intervening on markets where not necessary
- Any organization funded by the government should have to participate
- Small municipalities may do better on total diversion
- Target must be applicable to larger municipalities and mandatory to reach target
- Businesses should be required to report waste diversion rates
- Product design may make it difficult to achieve
- People are not going to care unless it costs money
- What were the barriers to the past targets and what was learned?
- It's about composition (things that can be classified)
- Uncertain about setting mandatory waste diversion targets for municipalities varying by size
- Rural municipalities will need to address backyard burning, which may increase
- Consumers must pay the true cost for hazardous items

- Lower target for smaller municipalities
- Need to establish a clear definition of waste diversion
- Municipality with < 50,000 could join together to form a cooperative approach for same target
- Cost pressures may increase
- Consider effectiveness of the system available for diversion
- Assess environmental performance benefit
- How will reuse be accounted for?
- Distinguish between diversion and re-processing
- Need to look at journey of waste – cradle to grave or lifecycle approach
- Diversion target on it's own is not enough – needs to be economical
- Disconnect between setting a goal and then setting targets – who should be responsible?
- May be inconsistency between municipal and provincial targets as well as industrial and provincial targets
- C&D mixes materials in one bin, Cost high to separate mixed waste
- Support for public reporting as long as it's not too onerous
- Before enforcement - need to establish current waste diversion rates by IC&I
- Focus should be on highest generators of waste in municipalities and IC&I
- Mandatory rate can vary based on amount of generation (prioritize)
- 40% still needs to be addressed
- IC&I – what would need to be reported – how detailed?
- Would there be different targets for different industries?
- Poor communication between levels of governments
- Education is key
- Need separate waste diversion program for northern Ontario
- Energy from waste should be included in the 60%
- More of a “carrot” than “stick” approach – rewards or incentives provided by MOE government (The more you recycle the more funding you get) – Could also establish penalties for non-compliance
- Have reward for going over target
- Formula based on population density
- Target should be based on waste reduction per person
- Mandatory diversion at provincial level
- IC&I should have separate targets (create a formula specifically for them)

Other Actions:

- Disposal costs are low while recycling/diversion costs are high
- Listed actions are good initiative to help reach goal of 60% -
- Provincially mandated bag limit, bag tags or clear bags (may motivated people to use their blue boxes)
- Create packaging surcharge (revenue neutral process)
- WDO punishes those manufacturers who don't use blue box program
- New technologies need to be considered such as gasification (energy to waste)
- Concentrate on “reuse”
- Handle recycling materials locally to lower transportation costs

- Deposit Return policy is a good idea to consider – deposit return system is incentive to recycle
- Market solutions – forget plastic #7
- Refill jugs, reuse shopping bags (attitude shift needs to occur)
- Treat like a “Utility Bill” – if people don’t have to “pay” they won’t do it
- Focus on what is good for the “local” community (geared toward specific area instead of overall template)
- Need transfer stations shared by several municipalities
- Work with MNR on bear prevention
- Focus on the bigger programs (i.e. used tires, oil and blue box)
- Enforcement legislation required
- Mandatory recycling pick up once a week
- Better receptacles – bigger
- Subsidies to pay for carts, backyard composting
- Province take a role in new technologies
- Rewards for building homes out of recycled materials
- Other uses for material should count, but could be disincentive (people can cheat)
- Need a good understanding of how the system works
- Mandatory that recyclables don’t end up in waste stream
- Sector by sector targets
- Expand 3Rs and have reporting
- Deposit return on steel drums
- Extend list of materials (i.e. steel and aluminum)

2. ACCELERATING CENTRALIZED COMPOSTING FOR RESIDENTIAL WASTE

Key Implementation Considerations and Challenges:

- This is a logical next step
- Essential but needs proper funding (a business case is also a good idea)
- MNR not recommending composting because of bear issues
- Backyard composting not going to work in urban setting (not easy to do, especially for multi-residential buildings)
- Backyard composting does work in Toronto – green bin program also helpful, biggest challenge is getting organic program into multi-residential buildings
- Who's going to enforce backyard composting
- People want to do it but some areas don't have organic programs
- IC&I sector needs organic bins in order to aid in 60% diversion target
- Certain types of organics can't be put in backyard composters
- Education is key – some people unsure how to use they're backyard composter
- No point in collecting compost/organics if viable markets aren't there – province needs to provide incentive to build infrastructure
- Blue boxes need to be provided in all multi-residential buildings as well as organics source separation facilities (cost however is a concern)
- Province should look at municipalities who already have organics programs – clear communication of what works/doesn't work
- Best practices across the board
- Define organic waste
- Lack of funds/support for education will impact success
- Look at cost of infrastructure and establish criteria for making decisions
- Wet waste diapers need to be considered
- Better system for collection needed
- Volume can be more than is needed
- Government needs to lead by example
- Cost of curbside collection more than disposal
- Participation level – backyard compost users more likely to participate
- Rodents are a concern in backyard composting
- Reality is we'd all like to do it – there's just no place to take it, which makes it hard to promote
- Halton recycling proposed to have a site in a local area, but it has never happened
- Takes longer in the North to compost because of the weather
- Odour and health issues are a concern
- Limited options in the rural areas – less private composting
- Backyard composters limited to leaf and yard waste because of animal issues
- If you have backyard composting you don't need the market because you just use it yourself
- Centralized composting produces saleable product
- All or nothing mentality
- Trucks that can pick up materials at the same time are important to consider
- Composting diapers etc. will be difficult because it's more complicated and costs more
- Need a certain tonnage to make recycling worthwhile (revenue)

- Ministry to help facilitate – IC&I and municipalities to work together for composting
- Garborators – what will the increase be in their use if ban is implemented?
- Need daily pick up for organics at commercial establishments due to health reasons
- Centralized site not of value for all municipalities
- Ban at curb easier
- Don't support bans, but believe incentive is needed as well as more education
- Centralized composting should apply to all municipalities, including rural
- Central composting difficult in rural/small municipalities
- Backyard composter market is saturated – those that will use them, already are
- Province should provide messaging and let local groups and municipalities customize program
- IC&I must be a provincial responsibility – municipalities do not normally collect their waste
- Need to educate that organics are another form of recycling
- Not going to reach 60% unless organic composting is promoted
- Concern that in some northern communities only 1/3 are doing backyard composting
- People enthusiastic about depots (effort is being made)
- Many happy with centralized compost and how it's run
- Cost in general is an overall concern – especially for municipalities (shouldn't be like blue box program with funding after the fact)
- Get it to the point where people are demanding they have their kitchen waste/organic waste collected
- Small municipalities need more flexibility
- Consider approval exemption for composting facilities
- Needs to be part of full diversion program
- Municipalities can provide composting services to others (fee for service)
- May be best to focus on larger municipalities
- Consider capital costs as well as cost to handle organics at landfills
- Need full life cycle analysis
- Different composition of waste based on economic strata
- IC&I organic waste streams may be better suited to manage residential organics
- Need to consider every step in supply chain and additional infrastructure to compost
- Need to maximize backyard composting before expanding centralized composting (i.e. education)
- Better data collection on backyard composting needed
- Need specific rules/regs/guidelines for streams of organic composition
- Three things need to be considered 1. Financing of facilities 2. Separation/delivery of facilities and 3. End markets – must do all three together
- Need money to kick start it
- Currently putting the “cart before the horse” – no end markets established
- Organics collection is expensive business (but, Toronto has demonstrated that it can be done)
- 80% of cost is collection
- No cheaper program than backyard composting
- Support any program that provides incentives
- IC&I can send organics to farms but municipalities can not

- Looking at municipalities individually creates a fragmented system
- Municipalities alone may not be able to drive this – may need an organization to drive this
- If compost meets appropriate guidelines than a market could be brownfields
- 2008 may be too soon to set up infrastructure (i.e. approvals etc, if money has to be found and sites established)
- Collection improvements may be needed - like use of plastic bags
- Government may need to legislate things like what bags can be used
- Harmonization of CCME guidelines will help
- C of A restrictions caused by itemizing what organics are
- Sometimes it's physically impossible to source separate
- System will develop naturally out of need
- Look at big picture – forward thinking
- May need segregated systems at some point
- Blending of compost products may help
- Look at lowest cost alternative
- Increase provincial support at all levels i.e. funding
- Collect compost/materials in clear bags
- More frequent collection in the summer
- Ease approval requirements to set up composting facilities – speed up approvals/review process – takes too long
- Relax EPA regulations for composting
- Leeway to handle multiple waste streams to compost site
- Use nutrient rich compost to rehabilitate brownfields after contaminants removed
- Timmins school board has composting program – uses the waste on their school property, ex. lunch materials composted in the school yard
- MOE should renew subsidizing backyard composting
- Work backwards – Where will it be used? Produce high quality product
- Focus on technology
- Should be financial incentive for organics programs
- Regional composting (need regional compost sheds)
- Agricultural community – explore need or use for compost
- Building code changes
- Retrofits – lower taxes create incentives
- Backyard composting subsidies

Other Actions:

- Make it easier for generator to find home for it (C of A approval for spreading leaves on farms)
- User fees – those who don't recycle should pay
- Rather see province say here's how you do it and be there as a support instead of setting a target – need encouragement and help getting started

- Like to see hospitals use cloth diapers since it has own laundry facility
- Look at percent of recyclables/organics in the load and apply tax or landfill surcharge

3. FEASIBILITY OF PHASING-IN A BAN ON DISPOSAL OF ORGANICS AND RECYCLABLE MATERIALS

Key Implementation Considerations and Challenges:

- Ban has to occur at point of generation – ban at the curb
- Bans are the back end of the chain - focus on the front end
- Resources are needed to sort mixed loads – are provincial officers going to landfills?
- Hazardous materials should be added into this ban as well
- Ban is not feasible unless you've dealt with finding new diversion technologies and reducing packaging – “Cart before the horse mentality”
- Ban is a tough love approach – will drive people to find other ways to manage source separation
- Cost is an issue both for capital infrastructure and operating funds
- Phase out use of plastic bags or tell grocers they can't sell No. 5 plastics
- Strategy should be multi-faceted
- Attitude shift needs to occur
- Enforcement will be difficult
- Lower generators of banned material will have greater challenges
- Fines/strict enforcement will get message out
- Level playing field – ban none or ban all
- C of A's would have to be the mechanism for implementing it
- Private landfills can make the business decision not to accept materials
- Market for banned material needs to be there before a ban is put in place
- Focus on where the largest gains can be made – what's currently not being captured that should be?
- Provincial ban may not be fair because of regional challenges
- Environmental impact needs to be considered
- Business case needed
- Bans are important but it shouldn't be an overall ban – needs to suit local community as well as fit into their business plans)
- No controls on commercial collectors – more control if municipality collects
- Contamination of the materials an issue – which plastics can and can't be recycled
- Private landfill sites want disposal – allowed to accept leaf and yard waste as well as materials that could be recycled
- Running out of space in existing landfill
- Dislike seeing provincial legislation that applies across the board; however, like province implementing ban because it takes ownership away from the municipalities
- People who live in unorganized townships would probably be exempt from everything
- Geographic concerns
- Unsupervised sites i.e. for cottagers
- Bin system in municipality works well – however some materials left at the bins that shouldn't be there
- Why just organics? Why not C&D wastes?
- Existing waste management contracts need to be considered for 2008 goal
- May be more viable if it was a provincial directive
- If clear bags were enforced what is the impact going to be on the existing markets?

- Must be fair for everyone in business
- Ban raises bar and forces results/action
- Need time to implement it
- Some municipalities already have bans
- Use clear messaging
- Promote end market uses
- Not all recyclables are economically useable
- Unless enforced, landfills are still cheaper
- Getting multi-residential buildings on board
- Need ban or designate organics to get to target
- Consider impact on landfill operation
- Phase in residential then multi-residential where feasible
- Like the idea but it must be part of a sustainable viable system
- Total ban unenforceable
- Cultural shift on recycling needs to occur
- Impact on private waste sector
- Not feasible for small rural areas of Ontario
- Garborators – what will the increase be if ban exists?
- Can't be done at landfill b/c of safety – moves too fast at transfer stations
- Need MOE enforcement officer/curbside cops
- How will IC&I sector be enforced in terms of a ban?
- Bans are appropriate for high risk materials
- Not sure we need a province wide ban but not opposed to it either
- Existing markets not being fed because it's cheaper to dispose than to recycle
- Far away from ban with organics – it's impractical
- Can't throw out possibility of ban without context – people need to know timing/placement
- Provincial leadership is important – promoting to citizens
- Health and Safety concerns if landfill operations are the enforcers
- Is it realistic to turn garbage away?
- Clear bags are a challenge – privacy issues
- What levels would materials be banned at?
- Are bio-solids part of the ban?
- What is the methodology/approach?
- IC&I different size entities
- Further away from generation, more difficult to separate
- Backyard burning may increase
- Could ban leaf and yard waste
- Training of staff needed so they understand what's been banned
- Inconsistency of what can be recycled
- Look at European and other jurisdictions for experience with bans
- At what size level would a ban apply?
- Legislation should not be restrictive
- Will re-processing facilities be needed?
- When mixed with organics can it be separated easily?

- Controlling cross contamination in collection systems
- Contaminated loads still have to go somewhere
- Is this what we should be focusing on now considering its challenges and potential impacts?
- Would be difficult for small industry, but may be able to use blue box
- Some sectors could influence haulers
- What about small businesses who have no curbside collection?
- If phasing in a ban than need to phase in curb side pick up or depots for IC&I
- Everyone responsible
- Focus on sectors where organics are generated (i.e. restaurants etc)
- Levy needed for bringing in banned goods
- Phase in ban – residential first then IC&I?
- Develop a deposit return – good front end solution
- Need alternative option – especially for pop cans
- Charge extra fee at landfill site if load isn't sorted
- Need to clearly define “organics”
- Clear bags should be used
- Can a ban be established for residential, but not IC&I?
- Closer examination of deposit return system needed
- There is no need for deposit return system
- Electronic waste or E-Waste should be designated under WDA

Other Actions:

- Need simplified process for siting C&D facilities
- People need understanding of points of intervention – lack of cohesion
- Social marketing/responsibility needs to be considered
- Need consistency at landfills – scales should be at all the landfills to record correct tonnage
- Organics picked up weekly/garbage bi-weekly (reduction in other services key)
- Program needed to eliminate “mystery bags” going into landfill
- Use of tipping fees to cover expenses of entire program including compost (leaf and yard waste)
- “Prison labour” for recycling facilities in terms of source separation (similar to model in the United States)
- Limit type of plastics used in Ontario
- Need to look at whole picture not just band-aid solution
- Change rules, specifically burden of proof, for littering/illegal disposal so easier to charge offender
- Province should site compost facilities like New Brunswick
- Province needs to treat garbage as a utility (full cost recovery – metered water used as an example) or establish a user pay system

4. DEVELOPING A FINANCING STRATEGY FOR INCREASED WASTE DIVERSION, INCLUDING CENTRALIZED COMPOSTING FOR RESIDENTIAL WASTE

Key Implementation Considerations and Challenges:

- User pay – fund transition – things work better on user pay system because people care about their pocketbook – user pay must be mandated by the province
- Lower percentage rate to borrow from the province
- Do not think provincial surcharge is a good idea
- Provincial funding needs to be clarified (i.e. loan)
- Recycling doesn't make financial sense
- Have to have a multi-pronged financing/funding approach – only way it will work
- Government must provide infrastructure and play an active leadership role in the process
- Manufacturers who don't produce recyclable products have to pay
- Dumping costs need to be increased – true cost of dumping – won't move to solution without this
- Get started on small stuff that can be dealt with more easily (i.e. deposit return system)
- Use existing municipal tax structure to fund strategy
- No more taxes – tired of taxes being increased
- Tourism attraction funding provided by Tourism Ministry must also address impact of increased waste – front end solution
- Significant surcharge on producers
- If manufacturers costs go up they will be passed on to consumers – They pay – We Pay
- Don't mind paying tax towards something that will better our future
- Incentives for research grants should be considered
- Look at what Canada's commitment is under KYOTO and Federal funding that could be available
- Expecting revenues from recyclables not realistic
- Need demographic review of province to determine where facilities need to be, don't need as many MRFs as we have
- Impact of EA length on financial planning
- Landfill surcharge – how will it be collected? Who pays it? How will it be used?
- Private sector will resist and want level playing field
- Municipality may not be able to act as a utility
- How would user pay work for multi-residential buildings?
- Financing for public education needs to come from the province
- Municipalities could work together where there are cost efficiencies to be made – economies of scale
- If this is a provincial target – manage financing provincially
- Before WDO considered as an option, current system needs thorough review to fix problems before moving on
- Municipality needs technology that someone else finances
- Issue comes back to geography and lack of markets
- Too many other priorities to fund without a financial solution
- Stewardship – don't have to pay if material doesn't go into blue box
- Landfilling is cheaper than recycling

- Limited market – free trade/foreign products
- Need to focus domestically on encouraging companies / manufacturers to produce more environmentally friendly products/packaging before foreign markets can be targeted
- Poor availability of scales at landfills in small municipalities
- Don't like user pay (bag tags) because will cause illegal dumping
- Municipal borrowing = more debt – we don't like that
- Greatest difficulty for smaller municipalities is upfront costs
- Provincial subsidy is good – don't have to find the money right away
- Cost of administration of bag tags
- Two or three municipalities work together on joint effort
- Extended Produce Responsibility (EPR) lifecycle responsibility needed
- If you don't recycle you don't get curbside pick up for garbage
- Zero percent interest
- WDO funding sounds like a good idea but does need to be expanded (need places in Ontario to take used computers etc – Tires are also a problem b/c nobody knows what to do with them)
- Comes back to cost of transportation
- Dislike loans
- Like the 50/50 system – believe it works
- Capital equipment the biggest up front cost – municipalities can handle operating costs after first year
- Like what's suggested in paper, however, need to address stewardship
- Agree that pay per use bag would decrease load on IC&I
- Taxpayers want to see that funds are going directly towards waste management
- Landfill taxes (similar to Europe)
- Flat fees and user based fees together would fund recycling and financing landfills
- Manufacturers and producers need to play a role – residents are paying for their waste
- Surcharge needs to be transparent
- Surcharge should be provincial not municipal
- Application of funds needs to be consistent
- How is “stewardship” defined under organics?
- Ensure money doesn't fund inefficiency
- Borrowing at low percentage not as good as user pay
- Ownership of infrastructure is better at a municipal level otherwise held to private sector rules
- Landfill surcharge can generate revenue collected by the province
- Designating “new wastes” by WDO important next step
- There is a role for all financing options
- Make collection of organics a municipal responsibility, Province needs to be sensitive to what little autonomy the municipalities have
- Need to get the best service for the best cost
- Municipal borrowing not going to be a popular thing among Municipalities (prefer grants)
- Should be able to bring back other materials (i.e. hazardous etc) back to where you bought it from
- Lack of co-ordination, knowledge of and sharing information from existing fund sources

- Municipalities will buy in if stewardship program in place
- Private sector will invest if there is a steady market (regardless of change of government)
- Push more private investment to Municipal Recycling Facilities (MRFs)
- Need a lot of facilities
- Problem of sharing resources – political concerns if two municipalities share a facility
- Industry passes cost on to consumers – but not all industries
- Visible or invisible prices
- Borrowing falls onto taxpayer
- Need cost benefit analysis
- Surcharge should be imposed on generator
- People need to understand what waste costs are and how cheap it is now
- Current system makes long term planning/funding difficult
- What about revenue from markets and reduced landfill costs
- There may be some funds that are necessary for blue box bins where there are no programs now or if there is a ban
- Look for simple solutions
- No lifecycle analysis has been done on recycling over landfill
- Build on programs already designated under WDA – stewards captured under more than one program
- Public sees blue box as something they should get free
- Would money be given to municipalities for picking up IC&I?
- Grants should be avoided
- R&D tax credits may encourage private sector investment
- Province should provide grants for research on waste diversion technologies
- 2008 too soon – needs time to develop incentives
- Too many barriers exist to investment in development of new technologies, programs, research
- 2% on PST (new tax)
- GST type solution
- Funding from industry based on projected use of packaging (influence packaging choices) – have to pay for non-environmentally friendly products
- Integrate it with PST (dedicate a portion towards waste diversion)
- Tax incentives for businesses to undertake diversion programs and waste generation reduction
- Tax products like compost to encourage organics diversion – similar to tax on cigarettes
- “Utility bill” format
- Surcharge per bottle etc. will help vs. landfill surcharge
- Bag tags – will force people to change their mentality of recycling
- Government has to make it cost prohibitive to use plastic (15 or 20 cent surcharge)
- Province give money to charities that reuse
- Auditing to ensure money used for intended purposes (user pay money into separate waste diversion fund) Designated green fund needed
- Minimum tipping fee for landfills in Ontario – may be a disincentive for IC&I
- Tax credits for infrastructure development or other programs
- Reward procurement practices that emphasize 3Rs and diversion
- EPR levy

- Private sector capital funding
- Provide same options for private sector as residential
- Eco-fee 1 cent a fee on everything you buy – more would have to be dedicated to the province
- Waste authority that charges by size of container
- Create a revolving fund
- Diversion property tax, not disposal user pay
- 1st bag free, rest user pay OR buy “50” bag tags for the year and when you run out you buy more
- Subsidy from province to municipality on items that are costly to recycle e.g. plastic bags, Styrofoam – until market is established

Other Actions:

- Industries could be less critical and better at suggesting improvements and solutions for problems that exist
- Most manufacturers not giving enough thought to end of life of product and impact of recycling – if they did this might drive improvements
- Need more involvement of the MOE in waste diversion programs
- What about illegal sites?
- What happened to “reuse” – now cheaper to buy than fix Province needs to have a strategy to maximize diversity
- Need to see this as a “cradle to grave” situation
- Municipalities invested in capital for blue box program then turned it over to private contractor – this should be considered again
- Like to see funding program like the blue box one 15 years ago
- Create incentives for manufacturers who make environmentally friendly products (could even be cheaper because they are environmentally friendly)
- Designate HHW under WDO as well as the other suggested materials on the list
- Instead of fluorescent tube designation it should say “any mercury produced product”
- MOE needs to ease guidelines on anaerobic / aerobic digestion (review guidelines for spreading sludge)
- MOE encourage municipalities to work together
- Need a regional solution – especially in the North (facilities)
- Tail end funding is an incentive for continuing the project in order to meet the goal
- Designate areas for reuse at the landfill
- Could there be a bonus clause for municipalities that may be above 60% by 2008?
- More partnerships between producers and government
- Phase in by population size/city size/tier (however be cautious of slacking/excuses and dragging out)
- Incentive/option for municipalities to enforce land use
- Shared municipal/provincial ownership – higher level of control
- Can we expand cooperation among municipalities with IC&I?
- Electronics should be the next to be designed as new wastes by WDO
- Municipalities let out of waste management – should be a private sector responsibility
- Make collection of organics a municipal responsibility

- Regional Plan (compost shed – similar to a water shed)
- Regional waste authorities
- Let private sector manage

5. INDUSTRIAL, COMMERCIAL AND INSTITUTIONAL WASTE DIVERSION: A RENEWED COMMITMENT

Key Implementation Considerations and Challenges

- Empower municipality – law enforcement officer to enforce 3R regulations
- Province to take leadership role
- Where do materials go if there is no alternative?
- “Educate, motivate, legislate” – need to “enforce”
- No new regulations unless old regulations are enforced
- Sector falls into MOE territory vs. municipal responsibility
- Province must educate IC&I on policies that are in place
- Feedback mechanism is required once information is collected
- Be selective on which sectors have to recycle what
- Waste audits may already be driving improvements by industry – will capture contributors of waste reductions
- Avoid duplication by using existing systems like NPRI
- Re-writing regulations and enforcement might not be of value – cost effectiveness
- Training small businesses a waste of money if not captured by regulation
- Level playing field – all businesses should contribute
- Questioning value of 60% and applicability to all sectors
- Need government promotion of successes in waste reduction – more rewards/media attention
- Build off of MOE’s Pollution Prevention awards as incentive program
- If IC&I targeted for 60% diversion calculations needs to address waste reduction (confusion on whether IC&I is included in the 60% target) 60% should be mandatory for IC&I
- Enforcement is key
- Need to educate businesses that there are regulations they should be following
- Control over IC&I bins – schools are noticing people are adding to the school bins instead of going to the depots
- Union issues
- Majority of schools not involved in recycling programs
- Businesses may not be reporting “true” numbers
- Small businesses are a concern because they aren’t doing recycling (generating a lot of waste and are not regulated)
- Buy in from everyone is needed in order for it to be successful
- Make it easier for companies to divert or else they won’t do it
- Training for small businesses is important (will help them understand the impact)
- Ministry cut backs for the past 10 years have hurt – now seeing ramifications from it
- Public reporting for small business will have more of an impact – won’t hurt to target big companies either (they want you to think they are good corporate citizens)
- “ZWAT” (Zero Waste Administration Team) helps in Thunder Bay – good example of end solution
- Hard to have requirements for businesses if municipalities can’t support their waste program
- “City thinking” especially with regulation 103/94

- Small companies have few staff
- Does MOE have the staff?
- “Cheating” on data reporting by giving waste to your neighbour
- Having enough trouble with performance measure reporting
- Only as good as the numbers being put there
- May be better to make them report than more mandatory rules
- Most smaller municipalities (especially in the North) don’t have by-law enforcers
- Should look at large companies and encourage them to reduce their waste
- Anything that produces waste should be on the list
- Apartment buildings need to be handled by municipalities vs. under 3Rs
- Contamination, enforcement and cost issues for multi-residential buildings
- Education – language barriers
- Concerned about time frame
- Some municipalities will not want to take ownership of apartment buildings – do not do one size fits all (what is the incentive for apartment buildings?)
- Perception that larger industries are already complying
- Enhancing Regulation 103/94 is a good idea
- Requiring only larger generators to report is unfair
- IC&I should be doing comparable to residential at least
- Ensure that it does not disadvantage trade
- Some municipalities may not want comprehensive responsibility
- What is in it for the municipality?
- Province needs to do its job and enforce the regulations –without proper enforcement the regulations are irrelevant
- ISO 14,000 more important to “bigger guys” – understand it better
- Would a target exist for every company or sector?
- Nothing in regulation to measure performance
- Don’t want to get into reporting information for the sake of reporting – where does data go? How does it help?
- Small businesses have no external requirements to report – do not trust 3rd party
- Municipalities unable to count small businesses tonnage into their numbers because they can’t distinguish
- Needs to be able to reflect production units
- Need to ensure company confidentiality
- No need for government intervention – enough corporate “bottom line” incentive to reduce waste
- Before revising Regulation 103/94 infrastructure must be in place
- Provincially driven procurement policy should be developed as a framework for other public and private organizations
- Public reporting should be based on largest generators as opposed to sector by sector basis
- School Board support GAP process type for themselves
- Better baseline data for IC&I and process
- Regulation 103/94 list recyclables but not all components have available recycling
- Small quantity generators not being serviced
- What waste would be included for IC&I?

- Not just largest but all generators
- What about 20/80 rule does it still apply?
- NPRI used negatively
- Different production volumes and processes may change volumes and affect conclusions
- Landfill works on volume
- Give industry flexibility to divert materials of their own choice, provided they contribute to waste reduction/diversion
- Dictating how to do things will not be productive – need to determine which big items can be diverted
- Schools recycling isn't the only answer – reduction too
- Training adds a burden
- Consumer demand still impacts what will be produced
- Consumer being penalized – manufactures should be as well
- Before product designed thought must be given to end of life needs
- More helpful to look sector by sector
- Where is municipal funding help for IC&I sector? We collect blue box materials but no extra funding
- Categories based on size of company
- Clearly define public reporting
- Replace “focus on training” with “focus on incentives” i.e. it's the law you must do it.
- Should be someone following up to see where buildings are at in terms of recycling
- Work with organizations/associations to target small businesses (spot checks on small businesses – BIA waste audit periodically)
- Enforcement with penalties
- Mandate small businesses to comply (although the government needs to figure out what is going to be done with the waste before it can mandate it)
- Data verification (although it costs money)
- Mechanisms need to be in place to enable them to divert (e.g. grocery stores)
- Incentives for private sector/IC&I/landfills to do something
- “3 strikes you're out rule” for non-compliance
- Fact sheets for multi-residential owners
- Make large generators pay for inspectors and audits
- Training for small business should be done in the same way as having people do WHMIS training
- Training general or tailored to your business (general environmental course with re-certification every 5 years or so)
- NPRI as model – report based on amount of waste produced, incentive to get off list
- More recycling containers in places like service stations and public places
- Government concentrate on private sector
- Coles notes for all 3Rs including regulations to help business understand regulations
- Aggregate reporting by sector/size
- More action on C&D, and metals producers

Other Actions:

- Privacy concern – smaller city everyone knows everyone
- It's easier to educate all residents if it's under municipal

- If it's in the people's economic interest they will do it
- Weighing a concern – scales
- Current definition won't reflect reduction in waste
- Focus on efficiencies
- Feedback mechanism needed so people know how information was used
- Service where people/small businesses can call to find information out –help line
- IC&I can get private contractors to manage the materials (hard to do this though because private contractors not willing or don't come to the North)
- Sector by sector approach better for recycled content rules
- Monitor amount of recycled content businesses using
- Credit/award/point system
- Report the baselines instead of what they're diverting
- Scale at every landfill to ensure complete data is obtained
- IC&I in smaller communities handled by the municipalities – look at giving them a credit for this)
- Expand WDO funding to include IC&I diversion (for the North specifically)
- Really crucial that there's a northern flavour to everything – localization is important
- Waste Exchange Program
- More long term vision instead of being pushed for 2008 (longer phase in)
- Motivate IC&I through tax audits
- Minister designate problematic materials like Styrofoam under the WDO

6. REDUCING PACKAGING AND INCREASING THE RECYCLED CONTENT IN PRODUCTS AND PACKAGING

Key Implementation Considerations and Challenges:

- Needs to be governed and enforced
- Package reduction is good; however, packaging changes can be costly to manufacturers
- Discrepancies in plastics – which can/can't be recycled?
- Manufacturers, distributors need to be targeted to encourage them to use recyclable materials
- Procurement policy as part of provincial leadership, government objective that things be recyclable
- Top priority should be reduction/reuse and then recycle
- Packaging surcharge / tax with funds going to diversion activities like education programs
- Consumers need more choice to make decisions
- More work needs to be done on how we determine what is better
- Diversion target doesn't recognize reductions so why focus on it?
- Are there opportunities to encourage people to reduce volumes like crushing recyclables
- Consider deposit return system
- Ask manufacturers to reduce their packaging – reduce excessive packaging/think before they put it on the market (how will government motivate industry to reduce packaging?)
- Government regulation/measuring tool – percent recycled weight to product weight
- Product marketing strategies and people's attitudes need to change
- Bulk buying/unnecessary packaging – charges for packages – only needed one screw but having to buy 20 in a package
- Can plastics be replaced?
- If plastics are reduced how does that impact industry?
- Approach industry with positive attitude
- Can all sectors/groups afford new types of packaging?
- People looking for best value, not what the packaging looks like
- Strong believer in incentive money – find a way that's more profitable for manufacturers
- “Show business- approach (oversize packaging)” for manufacturers has to end – bigger packaging doesn't mean better product
- Manufacturers responsible for putting materials in package that is environmentally friendly
- We're at the point where getting rid of packaging will be difficult (health and safety, etc.)
- Keep convenience when reducing packaging
- Shoplifting one reason why packaging is so large today
- Encourage people to re-use their packaging
- Increasing recyclability of certain products – i.e. Tim Horton cups
- PTE not picked up in some areas
- Need volume relationship between product size and packaging
- Greatest potential for reduction of waste is with packaging
- Difficult to impose on import products
- Lack of national standards

- Education is important
- LCBO share of funding not appropriate funding based on volume not weight
- Too many numbers in plastics – should be clarified
- Cost/Environmental benefit analysis regarding refillables and other recyclables
- Who provides best practices for packaging?
- Mandating recycled content limits the market
- Focus on developing markets
- EPR does not apply to all packaged goods – needs to be applied on a case by case basis – EPR has limitations to consider – health and safety for domestic and export markets
- Manufactures should find markets for their residue
- Need to focus on markets rather than packaging reductions
- Explore alternative packaging
- Manufactures whose materials are not going into blue box are paying less than those whose material is going into blue box
- “Clean choices” may not always be the best choice
- Technical limitations – can’t put hazardous materials in certain packaging
- Portability
- Work with other levels of government
- Accountability towards environmentally friendly products – too open ended
- Municipalities and Markets not equipped to handle packaging out there – barely able to handle #s 1 or 2 plastics right now
- Eco-label not encouraged – implications are great, huge pressures on manufacturing
- Concentrate on non-recyclable material
- Foil wrapped box board not recyclable
- Levy not fair for packaging
- Suppliers pay more to recycle
- Revisit program from late 90s that dealt with reducing packaging and make it thinner
- Work with federal government to change guidelines/recommendations – nation-wide
- Work with other jurisdictions that are bigger than ours (in the States) that have proven way of handling this initiative
- Develop unique Ontario solution
- Tamper proof packaging needs to be eliminated – packaging legislation required
- Take packaging back to where you purchased it (batteries included in this as well)
- Surcharge on non-recyclable and excessive package
- Re-useable packaging (cloth/carts)
- Go back to use of paper bags in grocery stores
- All materials should be recyclable
- Phase out use of all types of plastics
- Work with CBS on packaging initiatives
- Legislate but at the federal level
- Tax/fee when packaging is excessive
- Create an “eco-label” similar to “energy star” that can be paid for by the producers (Environment Canada)
- Need to develop criteria/basis for using the an eco-label
- WDO charge more if packaging is not recyclable
- Create a green dot system and green dot plus

- Impose different contribution levels for different packaging types
- Provide economic incentives for preferred packaging choices
- Life cycle analysis on each option
- Standardization of materials

Other Actions:

- Leaf and yard waste bags should be mandatory paper bags
- Fast food chains – no recycling/separation in restaurants
- Needs to be seen as a communal problem
- Source separation is important
- Cross contamination of streams
- More of an influence in area of procurement
- Focus on markets that aren't stable
- Recycling symbol has to come off products unless they truly are recyclable – industry has to stop scamming people
- Ontario hotline to offer information on recycling products
- Educate consumers
- Reward based/incentive system
- New technology to counteract shoplifting
- Deposit return (Tim Horton's cups, margarine containers and glass should not be handled at the curb)
- Plastic bag levy
- Change plastic container recycling rule
- Requirement to recycle plastic #s 1 and 2 only OR recycle all (Stewardship)
- Deposit return for all beverage containers
- All plastic bags could be bio-degradable but has shelf life limitation
- Money invested in developing markets for materials

7. FINDING NEW WASTE DIVERSION TECHNOLOGIES

Key Implementation Concerns and Challenges:

- Approvals process incredibly time consuming and slow – more streamlined process needed (sometimes faster to go outside of the MOE process than amend C of A) – HWIN and C of A information not shared
- Provincial support for new technology – need to encourage research and endorse development of new technologies
- Need to talk about incineration in a rational way – too much emotion attached to the topic (incineration a back end solution)
- Focus on front end solutions – sensible solution to waste – then identify solutions for materials that end up in the waste stream
- Need to address the other 40% - always going to be something that can't be recycled
- Inter-ministerial discussions/communication
- EAA important – why exempt?
- Approval process needs to be timely
- Some industry (e.g. farms) can't afford technology
- Need to be clear process – some kind of balance between EA process and approvals (some industries get approved while other initiatives take a long time)
- Cost – some technologies save money i.e. grinding tires before trucking so more can be sent
- Household hazardous waste collection – approvals take too long is onerous/prohibitive
- Technology can help streamline diversion – assist in breaking down materials i.e. furniture and mattresses (Province needs to make this more feasible)
- Each municipality shouldn't have to go through the same process
- Municipalities don't need research facilities
- Technologies used in other jurisdictions may not work everywhere
- Public confidence not there for existing technology
- Focus on existing technologies that work – build on them
- Supportive of research exemption
- Clarifying Regulation 334 is a good idea
- Think more about processing facilities
- Small scale operations shouldn't be forgotten
- Look at new technologies for new markets
- Too many hurdles to innovation
- Define waste diversion technology
- Work with other ministry's like – MMAH on zoning issues
- Should get EA just like everything else
- Look at innovative research centers
- Any technology will work if enough money is put towards it
- Support research exemption but need to provide clear guidelines on what research facilities would qualify
- Relax EA guidelines on pilot facilities
- MOE in its approvals process need to take into consideration risk/public impact
- Ministry feels need to dictate everything

- Regulation framework and interpretation impedes development of new technologies
- Need creative solution for new technologies of collection of organics vs. processing costs
- Look at ministry programs that could incent, encourage and support new technology development
- High capital cost – need encouragement and incentives for investment
- How will the government recognize development of new technology? – especially by students – make ideas visible – promote and reward
- Develop opportunities to increase cooperation and partnerships at all levels of government
- Permit by rule should be considered as example of simplified approach
- Need different process for simpler projects (i.e. equipment)
- Eliminate cost/fee of C of A for waste diversion programs/facilities
- Approval assistance at local level to assist with new technologies or research technology
- Class EA for waste diversion (some special process)
- Research money for universities or colleges – use students to help work on projects – could be done as part of their thesis
- One central place for all approvals “one stop shopping”
- Technology parks to test new technology
- Phase in through demonstration projects
- Better define ‘pilot project’
- Setting minimum tipping fee so that development of new technologies are not discouraged because they are out-priced or under cut
- Provincial review committee to endorse technologies to prevent wasted time on “red-herrings” concepts, duplication of wasted time
- All approvals for diversion should be streamlined not just new technologies

Other Actions:

- Quality built into the recovery of products – can’t just dump everything in at once
- Also need to define stakeholders (i.e. Sierra Club vs. local residents)
- Landfills are needed but take a long time to get approved
- Incentives should exist
- New technology to deal with tires should be developed
- Amend HWIN for adding paint etc. which would amend C of A – “Tire diversion” C of A took 5 months
- Rotating glass/plastic chippers or packers – share with municipalities – in one area one week and in another the next (Province would own the machine but would lend it to the municipalities)
- People should take more glass and rubber recyclables
- IC&I sector could pay for disposing
- Define ‘waste processing site’
- Processing technology for mattresses, furniture, carpet and shingles (for instance shingles could be converted into road materials)
- Incineration may make sense in some select components of the waste stream (not mass burn incineration)
- Four stream collection

- Sludge from paper should be looked at

8. EXPANDING PUBLIC EDUCATION AND AWARENESS ACTIVITIES TO PROMOTE 3RS (REDUCE, REUSE, RECYCLE)

Key Implementation Concerns and Challenges:

- Awareness and changing behaviour are not necessarily the same thing
- 3Rs to some mean Reading, Writing and Arithmetic – not reduce, reuse and recycle (change terminology to common language – keep it simple)
- Educate public at community events with hands on displays – show that recycling is clearly happening – important to also educate new Ontarians and companies as well
- Target youth – where change is going to happen the most – should be part of the curriculum
- Need “feel-good” advertising, targeted specific advertising, public education
- Funding needed to assist municipalities with promotion/awareness
- School workshops like today’s session on waste diversion/waste reduction
- How will promotional programs be sustainable?
- TV and radio ads by province or province wide campaign similar to anti-smoking initiative
- Some people will only be influenced by penalties
- Convenience can lead to awareness
- Use community activist groups
- Landlords need to accept responsibility
- Big industry can educate small industry on what they don’t need
- Keep re-enforcing message
- Multi-pronged approach
- Need to consider how to change culture
- Educate on plastics and which ones can and can’t be recycled – people don’t understand the environmental impact they have – contamination (sorting can be ineffective if contamination is too high – people need to be aware of this)
- Ontario government has to say you have to recycle – can’t just rely on the municipalities (Provincial leadership)
- Education has to start at home - better to spend money on educating the adults so they can teach it at home
- Schools are doing well but more can be done
- Be careful with paper advertising/bill inserts – already too much paper and it might get lost in shuffle
- Best provincial campaign was MTO snowmobile campaign – need to be catchy/not boring
- People don’t understand full implications – out of sight out of mind mentality
- Promote waste as not “garbage” but renewable “resource”
- Don’t want education to seem like propaganda or sales job
- Let people know where blue box material goes (what’s done with it?)
- People won’t make changes unless it’s going to impact their wallet
- MOE experts to help municipalities with education
- Municipalities working together –identify opportunities for partnerships
- More government resources towards education – constant reminder that 3Rs are important (essential to reaching the goal)

- Promote environmental careers
- Promotions need to be environmentally responsible as well
- Develop a campaign like “Keep Ontario Beautiful”
- To achieve 60% it needs to be sold to the public as a source of pride (positive message is necessary – how much has been recycled etc)
- Need to have province involved – province tells “why story” while municipalities tell “how” in their municipalities
- Province produces ready-to-use material for use by municipalities and others in awareness campaigns
- Multi-stakeholder review is important – what works/doesn’t work
- Million dollars in advertising is lost – takes a lot to affect change – don’t try and do it all at once
- Waste management companies can and do educate their clients
- Professional programs – training engineers in environment programs
- Carry education programs to high schools
- Need to advertise on new initiatives – beyond blue box advertising
- Possible funding – STAR program
- Misconceptions on environmental impact
- Need information on IC&I recycling
- Need Canadian website on waste diversion
- Decal “We Recycle” for retail sector to use
- Reward stewards for positive communications
- Needs to be new program at high school level to promote recycling – additional funding is needed towards this initiative (Grade 9 teach business case of waste diversion)
- Renewal of TV ads province-wide – will push issue back to the forefront of people’s minds
- Use celebrities to get the message out
- Promote different ways of using the materials (instead of just recycling)
- Mandate products to carry messaging (recyclable materials) like the cigarette packaging program
- Ontario wide recognizable logo
- Promotions geared towards northern Ontario
- Use networks of people to get messages out
- Two pronged approach educate through school and the public (Two messages needed – Provincial: “What has to be done” and Municipal: “What we do here”)
- Implement social marketing strategy
- Government partner with media networks
- Environmental labeling to identify products that are environmentally friendly
- PSA announcement on recycling (Stewardship Ontario should cover cost)
- Use internet better
- Design messages suitable for children
- Publish results so people know they are making a difference
- Sticker on blue box talking about what can and can’t be recycled
- Long term investment strategy needed
- Information provided at point of purchase

Other Actions:

- Need to know whether contractor will raise the price if government funding is involved?
- Tie it back to viable benefit (significantly reduce climate change)
- Why aren't we adding a 4th R – “Recover”

9. INITIATING A PROVINCE-WIDE MONITORING SYSTEM FOR WASTE

Key Implementation Considerations and Challenges:

- Will scales be put in for the rural municipalities? (No way of calculating how much commercial waste is generating)
- Need more accurate tracking system and need to decide what you are doing it for? (Build incentives so they can see benefits of monitoring)
- Add to corporate income tax reporting
- Regulations could be used
- Until things are mandatory people aren't going to do it
- Have to have infrastructure of governance on municipalities if monitoring is going to be required
- Utilize what exists already
- Stewards shouldn't be responsible for municipal reporting
- Large/small industry fairness system need to be equitable
- If made public be careful how much information is given out
- Industry/businesses successes could be publicized to set examples to strive to
- More access to data for everyone
- Lessons to be learned from WDO
- Credit for waste reduction not included in diversion tonnages
- Reservations about province-wide monitoring system – too many audits
- Cost to performance measuring and to provide provincial data (who will pay for scales/accuracy?)
- What can people do without – would become a priority if there was no garbage pickup
- Need data systems – shows measurable entity on approvals – type of comparison from one year to the next
- Abatement staff enforcement
- Reluctant as a Councilor to endorse a reporting program that's going to cost more money –not worth doing unless incentives are there
- Some municipalities are reporting IC&I some are not
- Private/provincially owned sites difficult to get information
- MOE should be prepared to help with costs
- Small businesses are treated like residents in small municipalities near Sudbury – how to separate the two needs to be addressed
- Businesses do their own – send staff to landfills to dispose their waste
- It will work in bigger municipalities because they can afford the cost but won't work as well for the smaller ones because of the cost
- Curbside doesn't measure everything
- Seen as another level of bureaucracy
- Companies already reporting – added costs
- No current requirements for IC&I, C&D to report
- Municipal diversion rate is calculated now – based on GAP analysis
- Capture rate not consistent
- Tremendous burden – many IC&I
- Can help address accountability issues
- Regulation 103 waste audits may be a method to procure this information

- Current cost of doing business
- Need provincially consistent way of measuring diversion (e.g. GAP)
- This is more an IC&I issue than it is municipal
- Government has the right to know what is generated and should be tracking what's generated and where it's going
- How detailed does reporting need to be?
- Does province have the ability to manage all this data?
- Does Stats Can already get this information?
- Same information needs to be available to everyone (both private/public companies)
- No clear tracking mechanisms
- Data call system – as good as it's going to get
- Push back from stewards who say this isn't good enough
- Measure IC&I at generators level – material is what you're looking for
- Waste audit information and tonnage – figure out materials from there
- Very supportive of this initiative – this has been missing in Province
- Difficult to get accurate data
- Need level playing field that is sector specific
- Costs of administration
- Does the recyclable content of waste warrant reporting by generators?
- Just having a number reported might be meaningless but also might be used against a business
- Capacity of infrastructure also needs to be monitored as it could impact progress
- What about benchmarks?
- IC&I must report waste diversion
- Per capita or per unit based reporting makes more sense
- Should be done at scales –need quality data but how do you get that without scales?
- Audit waste composition twice a year
- Work in partnership with waste industry – they have a stake in promoting/sponsorship
- Reporting from landfill attendant to municipality so they know what's going on and whether it's working
- Have reporting by providers/collectors or by region rather than breaking information down into separate municipalities
- Need a uniform reporting structure (eg GAP)
- On-line access, but how might that be used?
- Similar to NPRI – look for opportunities to harmonize
- Use data to build success stories to promote waste reduction
- Include in C of A process
- Accounting template for all reporters
- Government should only report tonnages as percentage to public

Other Actions:

- How do you reach the people who aren't following the 3Rs
- Some areas looking for recycling providers – current ones too busy

- NORA funding not available – need a provider
- Get politicians on board
- Waste management does save money
- Unsupervised landfill sites – tied to illegal disposal
- Cottagers – taxes not reflecting costs of services (\$25/yr total)
- Funding is now divided by municipalities not regions
- Signs on highway for litter – why not recycling?
- What’s the impact of not meeting the goal?
- Will diversion be specific by industry?
- If quality of recycled product doesn’t meet spec how dose that impact diversion?
- Talk to people at the landfill – distribute education materials
- Ministry staff assist in strategic planning with municipality
- Reward/recognition of people who recycle
- Spot checks at landfills

Other General Suggestions:

- Ontario’s legislative system of regulations need to be overhauled
- Ideas in Discussion Paper will not make Province a leader in waste diversion
- Look beyond 3Rs (i.e. look at residual management – recovery of energy)
- Mandatory litter penalties
- Re-design of blue boxes to manage litter
- Need to revisit waste diversion act by year end
- Implementation of WDA has been micromanaged rather than leaving it to industry
- Energy from waste should be considered waste diversion – not disposal
- Supporting re-use centers
- Look at everything not just individual steps or activities
- Waste Reduction Strategy also needed
- Is this all sustainable?
- How will environmental impact/benefit be measured?

Appendix 3: Industry’s View (MEDT-HOSTED SESSION)

1. Definitions, Targets and Objectives, Monitoring

- Clarify definition of diversion, sustainable, waste and situations where by-products and other process ‘raw materials’ are not considered to be a waste (i.e., ~~and~~ when they would or would not be accounted for as part of 60% diversion). Facilitate utilization rates and new product development for these materials.
- Need to provide for credit for waste reduction activities as well.
- Need to clarify apparent conflict between Environmental Protection Act (EPA) approved activities and Waste Diversion Act (WDA) objectives (e.g. for thermal systems).
- Thermal energy from waste (EFW) systems are not necessarily incineration, but EFW is currently excluded as a diversion method. Promote 4Rs, which includes energy recovery.
- If all thermal systems are excluded then the 60% diversion target is not likely to be met.
- Extensively consult with industry before designating new wastes for diversion. Learn from existing designations (e.g. Blue Box, scrap tires and used oil) and “walk before we run.”

2. Centralized Composting

- Central composting of organics will be critical to reaching 60% diversion target.

3. Phased-in Ban on Disposal

- Landfill bans should not be put in place until alternative systems are in place to manage the material.

4. Financing Strategy

- Clarify provincial waste disposal surcharge (how will they be levied, and whether income will go to consolidated revenue or to waste diversion activities).
- Landfill surcharge could inhibit brownfields redevelopment.
- Tax what you don’t want going into landfills, not materials that have nowhere else to go.
- Ensure surcharges don’t penalize products with other environmental benefits (e.g. fluorescent bulbs, which provide energy savings)
- Province should work with municipalities on sharing of waste diversion infrastructure assets across municipal boundaries to meet provincial targets.
- Supporting innovation, pilot projects and research and development for new products that have less waste, or utilize manufacturing by-products with existing technology, are more effective roles for government rather than trying to create markets.
- Industry representatives differed on whether government should fund central composting facilities, versus letting the market work if there is some product value.
- There should be a municipal pay-as-you-throw requirement.

5. IC&I Commitment Renewal

- Avoid ‘Pick Up Stix’ (random) approach to policy development by understanding and documenting flows and amounts of waste material generated and used within the province and flowing between Ontario and other jurisdictions before implementing measures to reduce waste.
- Consider the life-cycle of environmental impacts.
- Standardize what materials can be collected by municipalities across the province.
- Give small business information on what reusable materials can be sold, their value and where, through a website (not the Canadian Federation of Independent Business’) to help them reduce costs.
- Small business pays disproportionately high property taxes and feels they subsidize the residential Blue Box system.
- MOE should develop an economic risk assessment approach to be applied to all proposals , as is done in other jurisdictions.
- Provide recognition and other incentives to use recycled products.
- Will the government provide incentives for retrofitting etc., to reduce costs?

6. Reducing Packaging

- Need an economic incentive to use recycled material.
- Implement a California type program on recycled content for packaging
- Possible approach in discussion paper (i.e., standards requiring recycled content) could conflict with international standards.
- Packaging can change how a retailer is able to handle and store products.
- Reducing packaging and reusing it is easier than requiring a recycled content.
- Reusable packaging is a hard sell to consumers.

7. New Waste Diversion Technologies

- Support streamlining of approvals process for research but not for full scale waste facilities.
- Should focus on developing new technology so industry can use recyclable material in product manufacturing.

8. Education and Awareness

- Targeted education on environmental protection will be needed, not just general promotional campaigns.

9. Monitoring

- Reporting will put further administrative pressure on small businesses, when a pre-election promise was made to reduce it. Reporting of individual business information should not be made available to the general public.
- Monitoring and reporting will be too onerous for small business. Existing regulatory tools are not designed for small business use.