

April 18, 2019

Cindy Acab
Resource Recovery Policy Branch
40 St. Clair Avenue West
8th floor
Toronto, ON, M4V 1M2



Dear Ms. Acab,

RE: ERO:013-4689 Discussion paper on reducing litter and waste in our communities

BurlingtonGreen Environmental Association is a citizen-led, nonpartisan, registered charity. Through awareness, advocacy and action initiatives, we work with the community to protect the environment, mitigate climate change and to create a healthier, more environmentally responsible Burlington.

BurlingtonGreen shares the Province's goal of "an Ontario where we strive to decrease the amount of waste going to landfill, increase the province's overall diversion rate, and reduce greenhouse gases from the waste sector."

We support stronger recycling targets to ensure 100 per cent of single-use plastics are captured and at least 85 per cent are recycled.

We've provided our input and comments below.

2.1 PREVENT AND REDUCE LITTER IN NEIGHBOURHOODS AND PARKS

Discussion Questions

1. How best can the province coordinate a day of action on litter?

- It is our view that in order to coordinate a province wide day of action on litter, it is essential to leverage the organizations that are present and engaged in the community. For example, BurlingtonGreen coordinates an annual city-wide clean-up every April by engaging businesses and residents from all across the city. In order to effectively implement a day of action, community organizations, like BurlingtonGreen, who already have engagement with the community should be provided with the requisite resources in order to drive and support these activities.
- It is essential that if community organizations are to be involved, the day of action should not be a partisan event, but instead be branded non-partisan, such as the "Ontario province-wide clean up"

2. What do you or your organization do to reduce litter and waste in our public spaces? What role should the province play to facilitate this work?

- BurlingtonGreen organizes the City's largest annual Clean Up event. To date, more than 100,000 participants from all sectors of the community will have joined the collective clean up effort resulting in cleaner parks, streams, schoolyards and neighbourhoods in Burlington.

3. What and where are key hotspots for litter that you think should be addressed?

- Lakeside beach areas and streams are a serious concern as the litter not only has negative impacts on the eco-system, but the litter may disappear into the stream or lake and not be recoverable.
- Highway corridors as well as pathways through the city are key hotspots for litter.

4. How do you think litter can best be prevented in the first place? Where is access to diversion and disposal particularly limited?

- There needs to be more responsibility placed on the producers and businesses that generate waste in the first place, especially waste from packaging of goods and products.
- Diversion and disposal options are typically not sufficient in restaurants, particularly take-out restaurants.
- Though enforcement may be challenging, fines for littering should be increased – there should also be initiatives to drive public awareness of the increased fines.

2.2 INCREASE OPPORTUNITIES FOR ONTARIANS TO REDUCE WASTE

Discussion Questions

1. How can the province best help the public participate in waste reduction and diversion activities? How can the province facilitate better diversion in lagging areas, such as multi-unit residential buildings?

- There are many opportunities for the province to help the public improve in waste reduction and diversion:
 - Raising awareness on how to reduce waste and properly dispose of waste. A first step is promoting 3-stream waste stations across all public and government buildings in the province, in addition to standardizing Blue Box and Green Box items.
 - Implementing deposit programs for certain types of waste (plastic bottles for example).
 - Encouraging Ontarians to consume less either through banning plastic bags outright, or at the very least, mandating stores and service providers to not offer bags unless the customer asks).
 - It should be noted that other jurisdictions have either moved to, or begun moving towards, bans on plastic bags—or more broadly single use plastics, so a full ban is a viable option. For example:
 - Newfoundland and Labrador and Prince Edward Island are both working towards bans on plastic bags, with implementation over the coming year in order to support the transition to reusable bags.
 - The European Parliament has approved a law banning a wide-range of single use plastics.

2. What types of initiatives do you think would result in effective and real action on waste reduction and diversion for the IC&I sectors?

- Waste management programs should be redesigned so that businesses/organizations are charged for the amount of garbage they generate, but organics and recycling are not – this way it will encourage these organizations to more effectively divert waste through the organic/blue box channels.

- Organizations should be required to take the proper steps to ensure appropriate sorting of waste (garbage/recycling/organics).
- Measures should be taken to reduce the amount of packaging that is used for goods, materials and supplies.

3. What role do you think regulation should play in driving more waste reduction and diversion efforts from the IC&I sectors?

- Regulation should play a role where the cost of recycling / organic disposal would exceed the cost of sending the landfill. In a scenario where the cost to recycle is less than the cost to put in the garbage, there is naturally already an incentive to reduce what goes to landfill. On the other hand, where recycling cost exceeds garbage, regulation should play a role in ensuring appropriate disposal takes place.
- Extended Producer Responsibility, as defined in the Waste Act, should be implemented which will push producers to consider the full lifecycle of their materials, as well as the cost to recycle or dispose of materials.
- There are currently reporting requirements in other Acts, including Stewardship Ontario – existing reporting should be used and enhanced. Additionally, producers should be subject to audits to ensure accurate reporting.

5. What do you think about a province-wide program for the recovery of clothing and textiles?

- A program such as this would be a positive step, for end-of-life clothing and textiles. For any items that are not in unusable condition, they should be donated to organizations that will take them.

2.3 Make Producers Responsible for their Waste

Discussion Questions

- 1. How do you think the Blue Box Program could best be transitioned to full producer responsibility without disrupting services to Ontario households?**
 - Implementation of a fee model at point of purchase (similar to eco-fee), particularly for high priority items such as rechargeable batteries, appliances, mattresses, carpets, textiles, furniture and construction materials. The fee model would then fund the recycling operations as well as public awareness initiatives.
 - Additionally, standardizing Blue Box items can be part of the move to full producer responsibility.
- 2. Should it transition directly to producer responsibility under the Resource Recovery and Circular Economy Act, 2016 or through a phased approach?**
 - No comments – regardless of the direction chose, implementation should be done fairly quickly, not delayed for years unnecessarily.
- 3. When do you think the transition of the Blue Box Program should be completed?**
 - The transition should be completed as soon as is reasonably viable while minimizing risks of ineffective recycling operations or other issues that may arise if implemented too expeditiously without due care.

4. **What additional materials do you think should be managed through producer responsibility to maximize diversion?**
 - Packaging, paper items, plastic and glass bottles/containers, take out containers,
5. **How can we make it easier for the public to determine what should and should not go in the Blue Box?**
 - Clear labelling (stickers provided for the blue box, organics bin, garbage)
 - Functional online tools to look up items
 - Harmonization across jurisdictions and sectors (residential and IC&I should not have different requirements)
6. **How should the province implement the transition process of its existing programs to producer responsibility without interrupting service?**
 - The province will have to ensure that appropriate planning takes place to ensure a successful transition without service interruption.

2.4 Reduce and Divert Food & Organic Waste

Discussion Questions

1. What can be done to increase the safe rescue and donation of surplus food in Ontario?

The commitment to developing guidelines for the safe rescue and donation of surplus food is a good start, as is the plan to roll out an education program to promote increased awareness of safe food donation options and practices. As important, the government should implement a task force comprised of government, food industry wholesalers and retailers and the charitable food sector to identify and recommend ways to achieve a widely adopted program that:

- Mandates that retailers substantially reduce prices on goods approaching (not past) their best-before date
- Encourages retailers to offer “not-perfect” items such as bruised apples at significantly reduced prices to sell them before spoilage occurs
- Efficiently moves unsold goods approaching the end of their shelf life into the food donation sector to facilitate safe consumption and reduce waste
- Provides reasonable incentives, such as tax credits, for industry to adopt these practices

Recognizing that much good work is already being done by retailers in partnership with organizations such as Food for Life, an attempt to quantify current levels of food donation, and set targets and devise strategies to increase it would be desirable.

2. What role do you think government and industry can play in raising education and awareness on the issue of food waste?

The above-recommended task force should be able to identify strategies to reach consumers right where they purchase food: for example, a fact sheet/postcard showing the cost to the consumer of wasted food, the impact on climate change due to released methane, and the burden on landfill could be handed out at point-of-sale. Posters could also be displayed in strategic areas in grocery stores. A website can be set up to provide more information.

3. Do you think the province should ban food waste? If so, how do you think a ban would be best developed and implemented?

Yes, unequivocally: food waste should not be going to landfills. Mandate garbage bags to be clear (and work with garbage bag producers to switch to clear compostable bags), so that waste collectors can see what is in them. Any bags containing food would not be collected. This would need to be applied to the IC&I sector and multi-residential units as well as individual households in order to be effective. While not a foolproof solution, having to re-sort garbage and wait until the next collection would provide an incentive to change behaviour. In order to effectively implement a ban, adequate food composting facilities need to be in place and green cart programs rolled out province-wide and applied to multi-residential dwellings and the IC&I sector.

2.5 Reduce Plastic Waste Going into Landfills or Waterways

Discussion Questions

1. What do you think is the most effective way to reduce the amount of plastic waste that ends up in our environment and waterways?

The most effective solution is to create less plastic in the first place. Bagged milk should be replaced by recyclable cartons or, ideally, reusable glass jugs (on the latter, bottles should be returnable based on a refundable deposit program). Bottled water should be banned: this would serve two purposes – to keep Ontario’s aquifers for public use, and to eliminate the millions of single use plastic water bottles that must either be recycled or that end up in our environment. Producers must be incentivized to reduce plastic packaging and containers, whether by charging them for what they do use, or giving them a tax benefit for reducing their use of plastic, implementing a deposit-return model, switching back to glass etc. or a combination. Bring together a task force of producers, retailers and government to recommend feasible implementation strategies.

2. What role do you think the various levels of government should play in reducing plastic waste?

First and foremost, lead by example: ban all bottled water and plastic straws in provincial government buildings immediately and ensure all buildings have water bottle filling stations instead. The City of Burlington successfully adopted this approach several years ago.

Second, enact legislation that bans all single use plastics in Ontario, as well as Styrofoam and non-recyclable food containers (including coffee cups), and other non-recyclable plastic using a reasonable phased-in approach in consultation with producers to achieve zero single-use plastics and non-recyclable plastics within 3-5 years.

Though difficult to enforce, raise fines for littering. While this may not be the most effective deterrent, it sends a clear message that the government means business and elevates the importance of good environmental stewardship.

Again, working with the task force mentioned previously, develop strategies to support producers in developing innovative approaches to both plastic packaging and product recycling to reduce the former and increase the latter so that less virgin plastic is used initially, and more used plastic materials can be recycled and re-used. Strategies such as charging producers based on the volume and/or weight of materials that have to be recycled may need to be considered. Also consider a

return to glass bottles and containers where feasible. The pros and cons of using glass would need to be examined to evaluate the impact of additional weight on shipping costs/fuel consumption to determine the comparative carbon footprints of glass vs. plastic. <https://earth911.com/living-well-being/recycled-beverage-containers/>

The provincial government should work collaboratively with both the federal and municipal governments to implement changes and streamline legislation and enforcement. That said, do not wait for other levels of government to act, but lead the way in Ontario as an early adopter by researching best practices elsewhere to develop solutions appropriate for our province.

Finally, do NOT resort to burning plastic to eliminate it. In addition to wasting all of the energy and resources used to create it initially, “thermal treatment” – just a euphemism for incineration, creates toxic pollution which is harmful to human health and impossible to eliminate completely. Rather than spending money on incinerators, invest in new recycling technologies which will produce up to 10x more jobs than incineration.

3. Would you support and participate in shoreline and other clean-up projects to keep our waterways and land free of plastic waste?

BurlingtonGreen already holds an annual Clean Up event in Burlington as well as providing event greening services to reduce litter and remediate waste cross-contamination at numerous major events in Burlington. We would be pleased to discuss further collaborative projects of this type if the Province provides support to help offset the costs of additional initiatives.

4. Would a ban on single-use plastics be effective in reducing plastic waste?

Absolutely! All single use plastics should be banned: straws, plastic shopping bags, plastic produce bags, beverage containers etc. Please refer to the answer provided to Question 2.

5. What are your views on reducing plastic litter through initiatives such as deposit return programs?

The deposit/return program successfully run by the Beer Store demonstrates that this type of program works. For appropriate containers such as soft drink bottles, milk jugs and possibly other product containers such a program would be an effective means of re-using containers and then recycling them once they have reached the end of their usage life. Again, a return to the use of glass containers for many products should be explored as a key strategy in reducing the amount of plastic being used for packaging.

2.6 Provide Clear Rules for Compostables

Discussion Questions

1. How do you think compostable products and packaging should be managed in Ontario?

The discussion paper identifies a number of current challenges with non-food compostable products. The complexity of these challenges requires a collaborative approach to developing a strategy that would ideally be rolled out Canada-wide through provincial-federal collaboration and would ultimately achieve the following outcomes:

- A universal certification process for both compostable products and composting facilities

- A phased-in plan to divert compostables from landfill by ensuring that:
 - A minimum standard of what can be accepted is achieved at all composting facilities within the next five years, with an implementation timeline to bring all facilities up to full processing capability within 5-10 years
 - A clear and easy to understand identification system for labelling products, similar to the numbering system used for plastic packaging, is implemented within 5 years
 - A public education campaign to raise consumer competence in diverting acceptable compostables to the green bin program is launched within 1-2 years and is renewed on a periodic basis to update the public on program expansion
 - Adequate support for municipal governments is provided to enable them to upgrade composting facilities as required to meet certification standards

2. Should producers of compostable products and packaging be held responsible for the management and processing of their materials?

No, because that may introduce unnecessary duplication of effort and fragmentation of composting infrastructure. This infrastructure already exists, but needs to be upgraded and expanded to handle an increased volume and grade of compostable materials. This is where the producers could play a role. Perhaps a joint-venture model might be explored so that producers can partner with municipalities to manage composting facilities by investing in the infrastructure and operating costs, and sharing in the revenue produced by selling composted material. Other models, such as levies on producers to generate government revenue to fund some of the costs of the composting facilities could be considered, although this model may be less popular with industry. Ideally, it would work best if producers have a stake in the process but also benefit from it. This would promote the growth of such companies and help the economy, while at the same time, improving our composting infrastructure and capacity.

3. What role do you think standards and facility approvals should play in the proper management of compostable products and packaging?

Standards and facility certification will be critical to the development of an effective infrastructure and its operational capabilities. Without this, the risk is that composting will vary from region to region, and this will contribute to compostables continuing to end up in landfill. Without certification and standards, there will also be less incentive for industry to develop new compostable products and packaging. Being able to properly compost these materials will help to create a growing demand for them and hence, industry will respond by expanding the supply. What is also critical is public education: without this, the challenge of improperly sorted waste materials will hamstring the process and adversely impact the results, thereby undercutting the potential to be gained through certification and standards.

4.0 WE WANT TO HEAR FROM YOU

1. Of all the initiatives detailed in this discussion paper, what do you think should be a priority for early action?

- Ban single use plastics
- Develop new deposit-return systems

- Make producers responsible for the costs to manage/recycle waste products to promote reduced packaging, transition to more reusable containers (e.g. glass and aluminum vs. plastic)
- Focus on diversion of food waste to composting facilities to reduce GHG emissions
- Achieve a full roll-out of recycling and composting to multi-residential dwellings and the IC&I sector

2. How do you think Ontario can best maintain its competitiveness and growth while reducing the amount of waste going to landfill and litter in our communities?

Implement a polluter pays model that is responsive to the market mechanisms of supply and demand and use some of the revenues to improve our waste handling infrastructure. Additionally, fund public education programs to support better waste diversion by consumers, while also growing our green energy sector and jobs in the waste/circular economy sectors.

3. How do you think we can make Ontario a leader in waste reduction and diversion once again?

Set more aggressive targets for waste reduction, legislate compliance by all sectors, implement a producer-responsibility model, educate consumers and provide adequate support to municipalities and not-for-profit organizations to optimize their ability to do their part.

Closing Comments

BurlingtonGreen supports the government's efforts to reduce waste and better manage it in order to ease the burden on landfills, reduce environmental contamination and significantly lower the greenhouse gas emissions created by organic waste. We are compelled to stress, however, that in view of the criticality of climate change as evidenced in the latest report by the UN IPCC, the most pressing need is to reduce provincial carbon emissions to align with a maximum of 1.5 degrees of warming by implementing a polluter pays program. In addition to funding green energy projects and stimulating the growing green energy economy, revenues from this program could help to fund many of the strategies that are needed to create a waste-free Ontario and support a circular economy. We urge the Province of Ontario to stand down its opposition to carbon pricing, and approach climate change in the same strategic manner it is suggesting in this Discussion Paper to address Ontario's waste challenges. We then would truly have a viable and effective Made in Ontario Environment Plan.

Thank you for the opportunity to provide input on this important issue. We look forward to further opportunities for dialogue and collaboration.

Sincerely,

Marwa Selim

On behalf of the BurlingtonGreen Advocacy Team
 Program Manager and Advocacy Coordinator
 BurlingtonGreen Environmental Association

CC: Jane McKenna, MPP, Burlington