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**RE: EBR Registry Number 013-1814: Food and Organic Waste Framework**

Recycling Council of Ontario (RCO) is a multi-stakeholder, not-for-profit organization committed to minimizing society's impact on the environment by eliminating waste. Members include municipalities, retailers, manufacturers, material management companies, brand owners, industry associations, schools, academics, and individuals. We are an independent organization that develops policy positions based on research, experience and unfettered discussion with stakeholders.

Policy positions are taken with a focus on environmental outcomes based on a hierarchy that prioritizes waste prevention, resource reutilization, and conservation. Our mission is to inform and educate all members of society about the generation of waste, the avoidance of waste, the more efficient use of resources, and the benefits and/or consequences of these activities.

On behalf of RCO I would like to commend the Ministry of Environment and Climate Change (MOECC) for prioritizing food and organic waste, and engaging with stakeholders and soliciting feedback on its proposed framework. Food and organic waste is at peak awareness going into 2018, and the Government of Ontario is taking action on an important waste stream at an opportune time.

RCO has long been active in addressing food and food waste, particularly in education and for the Industrial, Commercial, and Institutional (IC&I) sectors.

Our long-standing education program, the Waste-Free Lunch Challenge, has inspired and empowered students, educators, and parents to minimize food and packaging waste in school and at home. It focuses on avoidance through awareness; prevention through 3Rs; reduction through better management; and proactive and informed purchasing.

One week before the challenge takes place, students perform a waste audit to assess how much food and packaging waste is typically generated at lunch. For the Waste-Free Lunch Challenge itself, another waste audit is conducted and the difference is measured and reported to RCO. Since 2010 Ontario schools have prevented more than 100,000 kilograms (220,000 pounds) of food and packaging from entering disposal through the Waste-Free Lunch Challenge.

As part of Waste Reduction Week in Canada celebrations we encouraged Canadians to take the Food Waste Pledge as part of Food Waste Friday, and commit to a series of important measures to encourage reduction: planning meals and making a grocery list; storing fruits and vegetables properly so they last longer; getting creative with leftovers; and thinking about expiry dates.

For the inaugural Food Waste Friday in 2017 more than 28,000 schools, groups, communities, and individuals took the Food Waste Pledge, which indicates that Canadians are serious about food waste.

In the spring of 2011, RCO launched 3RCertified to offer incentive for businesses and institutions to make a meaningful commitment to the principles and practices of waste diversion. Waste generators that are successful in achieving 3RCertified status receive a third-party verification of their waste management system through compliance with 3Rs Regulations. In doing so properties receive:

- Assured fulfilment of certain MOECC regulatory requirements
- Third-party verification of participating organizations' solid waste management programs and ongoing performance improvement
- Provision of standardized tools for tracking, measuring, and preventing solid waste disposal

The centrepiece of 3RCertified is a comprehensive set of criteria that serves as a collection of performance standards that considers all aspects of an organization's waste management procedures, including organics.

Finally, in 2017 RCO convened an IC&I Advisory Committee populated by organizations that own and manage some of the largest real estate portfolios in Canada – and more than 2.5 billion square feet worldwide – to add to a knowledge base that can be leveraged in a variety of ways. The committee members represent the diverse IC&I sector and work in a collaborative and non-competitive fashion. During ongoing discussions food and organic waste was identified as a priority and problematic waste stream, which further underscores industry awareness on this issue.

Therefore, we offer comment on various aspects of the *Food and Organic Waste Framework* based on our experience and observations in food and organic waste reduction and management, and working closely with the full value chain.

## Part A: Food and Organic Waste Action Plan

### 1. Reduce Food Waste

#### 2. Province to enhance and incorporate waste reduction and resource recovery activities within schools

RCO is keenly aware about the importance of environmental education, and the enthusiasm in which students and teachers demonstrate when it comes to waste reduction. The opportunity for hands-on learning and activities in waste reduction and diversion leads to significant impact on waste generation; lends further learning to smart consumption, resource conservation; and offers greater comprehension of what is (and is not) recyclable, compostable, and why.

Experience has proven that youth apply key learnings from school and utilize them outside the classroom. Teachers and parents consistently share that students often become the educators to ensure proper waste management techniques are implemented in school and at home through packing and purchasing decisions, and putting discarded items in the correct receptacles.

By incorporating waste reduction, with focus on food and organic waste, into curriculums is an effective and important consideration that will have long-lasting benefits. RCO would be pleased to partner with the MOECC to share and build on our resources, including a standardized Food Waste Audit Tool and other resource materials, for educators that help schools track and report food and food waste diversion performance.

#### 7. Province to develop data collection mechanisms for measuring progressing waste reduction and resource recovery of food and organic waste

Accurate and consistent data has historically been unsubstantiated in the IC&I sector. It is interesting to note, however, that many organizations and facilities make claims of zero waste, yet Statistics Canada data estimates Ontario's IC&I sector diverts a mere 13 per cent of its waste. The MOECC is correct in wanting to improve data tracking and collection, and in particular the IC&I sector, to ensure policy is based on fact. To do so priority must be placed on reviewing, improving, and enforcing 3Rs Regulations. As noted in the *Strategy for a Waste-Free Ontario* the MOECC has committed to a 3Rs Regulations review in 2018 and application in 2019.

The 3Rs Regulations review should emphasize source separation and proof of final disposition for data reporting tools to increase understanding, and pinpoint the stage in the supply chain where greater oversight support and resources may be needed. Data reporting tools must also help to standardize performance reporting, including definitions of desired management approaches, methodologies for reporting and calculating performance, and verification protocols. RCO also suggests that once the proper apparatus is in place that all affected stakeholders provide, at minimum, quarterly reports.

#### 4. Promote Beneficial Uses

##### 17. Province to support green procurement practices, including the use of products, such as compost and digestate

RCO was pleased to see procurement identified as an action item in the *Strategy for Building a Waste-Free Ontario*, and is encouraged to see it included in *Food and Organic Waste Framework*. However, how procurement can be applied as it relates to food and organic waste can be significantly expanded.

The Government of Ontario is the single largest buyer of goods and services in the province. It also provides funding to large institutions across province, including hospitals, universities, schools, and other facilities. With such a large real estate portfolio, the Government of Ontario has the capability to implement and enforce policy across government departments and/or organizations that receive funding that integrates a procurement policy related to catering, food services, or restaurant tenants to prohibit food waste. In essence, a procurement policy as part of the *Food and Organic Waste Framework* should require all food services to support the proper management of food waste in accordance with the framework and overall government waste policy. This can be effectively facilitated through the procurement provision in the Policy Statement in the framework.

#### Part B: Food and Organic Waste Policy Statement

##### Part III: Policies

##### 2. Targets

RCO fully supports the introduction of targets that can serve a dual purpose of the managing implementation process and measuring success. However, we feel that the target timeframe as currently proposed can be accelerated. In section 2.1 on page 40 the table proposes a target year of 2025 for entities *b* through *g*. RCO suggests targeting the year 2023 as instruments to collect and analyze data will already be in place with the market ready to support increased capacity.

Furthermore, to meet stated targets and measure success, a standardized performance measurement methodology is required. It is important that data is collected and analyzed evenly and consistently between municipalities and IC&I facilities. RCO developed the *Standard Waste Audit Methodology* for waste auditors to conduct a study of on-site materials management and solid waste generation for 3RCertified. It was designed to meet and exceed the requirements of Ontario Regulation 102/94 and can be applied to any size or type of IC&I generator in any jurisdiction. By acquiring systematic and consistent data we are able to establish clear baselines and accurately assess performance improvement or regression.

Of note, performance targets can include waste reduction, as well as resource recovery activities. However, the definition of *resource recovery* includes ‘other activities’ as end-use in the framework’s glossary. RCO would like to make note that it is critical diverted materials managed for highest and best use (lowest environmental impact) are associated with preferred environmental outcome rather than beneficial uses.

## 5. Compostable Products and Packaging

It is our understanding that compostable products and packaging are subject to producer fees as part of the Blue Box Program Plan. To maintain a level playing field, producers that successfully integrate third-party certified compostable packaging into municipal Green Bin Programs (meaning they are not a contaminate in the system) should receive diversion credits as they do for non-compostable packaging in the Blue Box Program. Furthermore, municipalities should be able to claim associated management costs for processing compostable packaging that is managed in their Green Bin Program as an eligible cost in their Blue Box claims.

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The *Food and Organic Framework* is an important initiative that will continue to move Ontario into a place of environmental leadership and accelerate the transition to the circular economy.

Thank you for your consideration, and we would be pleased to discuss the contents of this submission at your convenience.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Jo-Anne St Godard".

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