



Marc Peverini
Policy Advisor
Ministry of the Environment and Climate Change
Integrated Environmental Policy Division
Waste Management Policy Branch
Non-Hazardous Waste Policy Section
40 St. Clair Ave. W., 8th Fl.
Toronto Ontario M4V 1M2

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**Proposed Strategy for a Waste-Free Ontario:
Building the Circular Economy**

This submission from Recycling Council of Ontario (RCO) is in respect to a regulatory proposal notice from the Ontario Ministry of the Environment and Climate Change (MOECC).

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, retailers and 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.

RCO is pleased to provide comment on the final draft of the proposed *Strategy for a Waste-Free Ontario: Building a Circular Economy*. The strategy provides stakeholders with opportunity to understand, support, and participate in the priorities of government by clearly identifying objectives and implementation tactics and timelines. Its objectives are comprehensive and attempt to prioritize aspects of necessary policy change to move Ontario to a circular economy, which includes transitioning existing producer responsibility programs to the *Resource Recovery and Circular Economy Act*, focusing on organics waste reduction, improving waste reduction performance in the Industrial, Commercial and & Institutional (IC&I) sectors, and committing to green procurement practices.

RCO notes that there are deficiencies in strategy with important aspects absent or, in some cases, require more detail. Our comments are prioritized by their ability to produce the most impact on waste elimination and drive circular economic outcomes. RCO offers each recommendation in the spirit of maximizing results of its implementation.

General Amendments

Disposal levies absent

Jurisdictions around the world that boast the highest waste reduction achievements and positive market transitions include broad-based disposal levies. Responsibly pricing the costs of pollution is important accounting for the full economic and environmental impacts of waste, and addresses the cost disparity between the disposal and recycling that is often a barrier to attract investments needed to expand and support more recycling and/or reuse. Correcting disposal values to properly reflect their long-term pollution and loss of natural capital is fundamental to shifting behaviours and markets that support a transition from a linear to circular economy. A provincial strategy that is void of disposal levies undermines the overall objective of this transition that is a basic tenet to success.

Lack of reduction and reuse objectives as action items

The Government of Ontario consistently recognizes the superior impacts achieved through waste reduction and reuse, however, the strategy is effectively void of these hierarchies. If the government is serious about protecting resources through minimization and reducing greenhouse gases (GHG) emissions associated with production and consumption the provincial strategy must include dedicated reduction and reuse objectives as actions with publicly reported measurements.

Monitoring and reporting against goals

The primary goals to achieve zero waste and GHG reductions from the waste sector are laudable provides opportunity for Ontario to be an environmental leader. However, the goals included in the strategy – *30 per cent diversion by 2020, 50 per cent diversion rate by 2030, and 80 per cent diversion rate by 2050* – even if aspirational, do not reflect the objectives as they are presented in the strategy; particularly the environmental risks and economic missed opportunities associated with waste:

In 2014 alone, about 11.5 million tonnes were generated in the province – nearly a tonne of waste per person in just one year. For the last 10 years, three-quarters of this waste has been sent to landfill. This figure has not changed in almost a decade. ... Sending valuable resources to landfill poses significant risks to both human and environmental health, and leads to unpredictable pricing increases, supply chain risks and growing pressures on virgin materials.

Strategy for a Waste-Free Ontario, page 4

Despite the urgency of action and recognition of multiple environmental, social, and economic benefits of improved waste reduction the goals of the strategy are disappointingly low.

In fact, the strategy does not provide any benchmark values from which to base its targets. If the strategy uses the latest available Statistics Canada's data the diversion rate for Ontario in 2012 is 24 per cent. (Note: no diversion statistics were reported in 2014.) This figure represents 2,829,205 tonnes of waste being diverted, which leaves 9,208,839 tonnes disposed of and creates 9.3 megatonnes of GHG emissions.

Using the benchmarks stated in the strategy the Government of Ontario proposes an abysmal six per cent increase in diversion rate over an eight-year period (2012 – 2020). Table 1 projects the diversion rate increases for each of the three stated targets, the weight in tonnes that will continue to be lost to disposal, and GHG emissions for each period. It should be noted that the estimates do not assume any population or waste generation increases.

Table 1: Wastes disposed and GHG emissions that will continue to be generated based on strategy targets

	Statistics Canada	As Proposed in the Strategy		
	2012	2017-2020	2021-2030	2031-2050
Diversion rate	24%	30%	50%	80%
Total generated per year (2012)	12,038,044	12,038,044	12,038,044	12,038,044
Total diverted per year	2,829,205	3,611,413	6,019,022	9,630,435
Total disposed per year	9,208,839	8,426,631	6,019,022	2,407,609
New tonnes diverted per year	N/A	782,208	2,407,609	3,611,413
GHGs generated by waste disposal per year	9.2 MT	8.43 MT	6.02 MT	2.41 MT

Given the environmental and economic imperative of improving waste reduction in Ontario as emphasized in the strategy, RCO recommends performance benchmarks be increased, particularly in the short term (2017-2020) to no less than an additional 20 per cent from 2012 levels as stated by Statistics Canada.

Performance reports for each action item

A strategy should represent an overall blueprint that sets objectives with associated benchmarks that are tracked and reported to measure success or adjust as needed.

In addition to setting weak targets the strategy does not provide details of the expected impacts or contributions towards objectives for each of the independent actions; what effect, expressed in absolute measures (tonnes), is targeted or attributed to each independent action item?

For example, to achieve the first target of 30 per cent by 2020, a target of an additional 522,000 tonnes (based Statistics Canada 2012 data) of waste will need to be reduced through generation reduction or diversion away from disposal. To monitor progress toward achieving future targets, each action item should express their proposed impacts by tonnage incrementally. These benchmarks will inform how to prioritize each action items and provide a mechanism to be report progress. See Table 2 for an example.

Table 2: Sample benchmarks and progress reports

Target: 30 per cent by 2020 or x tonnes			Contribution toward target	Tonnes reduced
Objective	Short-Term (2017 – 28)	Medium- to Long-Term (2019 and beyond)		
Amend 3Rs Regulations to increase resource recovery across all sectors		Implement amended 3Rs Regulation	5 per cent	26,100
Designate new materials to ensure producers are fully responsible for recovering more materials from products and packaging		Begin to designate new materials (e.g., batteries, fluorescent bulbs and tubes, electronics)	2 per cent	5220

The strategy does indicate a need for improved data, and states the opportunity to fill those gaps through various measures, including *Action 3: Establish a registry and build data capacity to provide for evidence based decisions.*

RCO recommends the registry be used in the short term (2017 and 2018) to collect data, which includes service providers, municipalities, and non-residential generators to fill that gap. This necessary data will underpin all future policy decisions and will become the benchmark to measure future impacts. The Ministry of the Environment and Climate Change (MOECC) should not limit the new registry to transition stewardship programs under the *Waste Diversion Act*, rather, fill data gaps as its priority.

Public reporting

The strategy does not include information on how the Government of Ontario will report on its progress toward each objective and action item in terms of the effects on policy implementation, as well as its own activities and commitments.

RCO recommends the strategy include a clear timeline and/or process for reporting status against objectives, and a mechanism to facilitate transparent reporting against objectives and action items for government and stakeholders that are obligated to its provisions.

Green procurement practices

Commitment to examine and improve procurement policies and practices is one of the most important and potentially impactful of all action items contained in the strategy. The Government of Ontario is a large and influential purchaser of goods and services that can single-handedly support the transition toward a circular economy without having to enact any legislation. It also provides funding to a broad list of organizations, including municipalities, hospitals, universities, colleges, and schools. The government can encourage funding recipients to take an active role in procurement that reflect circular economy principles.

RCO recommends the MOECC encourage or direct the Government of Ontario to activate progressive environmental procurement policies and practices, and prioritize this action item for implementation in 2017.

Reduce volume of food and organic waste going to landfill

The strategy recognizes that organic materials contribute upwards of 30 per cent of Ontario's disposal, represents a national economic loss of \$31 billion, and comprises a significant portion of GHG emissions attributed to the waste industry. RCO supports consultation with stakeholders to support a secondary strategy to tackle organic waste, however, notes that government has opportunities to begin to implement improvements through other action items: green procurement (Action 14), disposal bans (Action 15), amending 3Rs regulations (Action 5), promotion and education requirements (Action 8), and issuing policy statements (Action 2).

Given the potential positive impacts of improved organic waste reduction, RCO recommends that each of these other action items, which have short-term implementation timeframes within the strategy, are used.

Waste reduction, reuse, and recycling activities as carbon credits

All activities made voluntarily and/or mandated through policy should be subject to credits under the Government of Ontario's cap and trade program. If these measures are measurable, sustainable, and contribute to zero waste and zero emissions goals, they should be recognized and rewarded.

Specific Amendments

Action 4: Transition existing waste diversion program smoothly to new producer responsibility framework without disruption of services

Action 9: Designate new materials to ensure producers are fully responsible for recovering more materials from products and packaging

Action 15: Implement disposal bans to direct materials to end-markets

RCO believes action items 4, 9, and 15 are complementary and should be implemented simultaneously.

While the transition of existing waste diversion programs is a short-term goal, the transition process provides opportunity for government to expand targets through new product/package designation, as well as expanding the scope of producer requirements to include residential and non-residential sectors. Due the potential hazardous nature, current low performance, and opportunities to expand scope of the requirement to expand to the IC&I sectors, RCO recommends hazardous and waste electrical and electronic equipment be prioritized.

Disposal bans are also an effective policy approach that targets specific products and materials that may be hazardous when disposed of, are prevalent in the waste stream, contributes to overall disposal rates, and/or could be managed through existing recycling processes; however, still end up disposal due to a lack of market interest or other type of policy pressures (i.e., producer responsibility). Given the barriers that exist with cheap disposal, banning material that already have recycling solutions or established programs should be made a priority in the strategy's short term (2017-2018): mercury-containing lamps; fibre-based materials such as boxboard, cardboard, and paper; organics; and metals. Domestic processing currently exists for each of these material types and banning them from disposal will have immediate and positive effect.

Implementing bans should be considered and carried out in parallel with Actions 4 and 9 as result of their collective ability to shift market behaviours and investments.

The strategy should also be adjusted to move all three of these action items to be implemented in the short-term (2017-2018) timeframe.

Action 1: Empower the Resource Productivity and Recovery Authority

RCO notes the strategy lists a key function of the Resource Productivity and Recovery Authority under the new producer responsibility regime to include operating a public-facing registry or, as described in the strategy, a data clearinghouse.

The term *data clearinghouse* in this context often refers to the function whereby a third-party agency determines and allocates collected materials (generally packaging) to producer schemes when there are multiple producer collectives and a common collection system that is shared. As per the *Waste-Free Ontario Act* this is not an intended role for the Resource Productivity and Resource Authority.

To ensure clarity RCO recommends the strategy refrain from using the *data clearinghouse* to describe a function of the Resource Productivity and Recovery Authority.

RCO has been a strong advocate for an overarching long-term provincial strategy because it can provide important and necessary policy objectives where action items offer stakeholders clear understanding of government priorities, as well as opportunities for direct stakeholder engagement.

Furthermore, a pivotal aspect of effective policy implementation to improve waste reduction is anticipation and predictability for market adjustments, which the proposed *Strategy for a Waste-Free Ontario: Building a Circular Economy* provides.

Thank you for your consideration, and we would be pleased to discuss the contents of this submission at your convenience. RCO will remain an active participant in supporting its implementation.

Jo-Anne St. Godard
Executive Director
Recycling Council of Ontario