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

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This submission from Recycling Council of Ontario (RCO) is in respect a discussion paper from the Ontario Ministry of the Environment, Conservation, and Parks (MOECP).

**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, industry associations, schools, academics, and individuals. We are an independent and neutral 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 *Reducing Litter and Waste in Our Communities: Discussion Paper*. It outlines some of the critical environmental issues that face Ontario today, which include the economic, environmental, and social losses associated with increasing generation of waste and disposal.

RCO estimates that 15 of Ontario's largest landfills will reach capacity within the next 10 years and potentially strand 48 million tonnes of materials lost to disposal and as litter. In 2017, China, the world's largest importer of recycled materials, abruptly applied restrictions that left western jurisdictions, including Canada and Ontario, with less prospects to sell collected commodity materials. With recycling businesses continuing to compete with cheaper disposal options, Ontario's ability to turn its own recyclables into valuable feedstocks for reproduction is limited.

As such, Ontario's commitment, as outlined in this discussion paper, to prioritize waste reduction through reduced generation and shift markets to use resources more efficiently, value discards, and create opportunity to reintegrate materials into production cycles, comes at a critical juncture.

While the discussion paper generally poses questions on critical areas it neglects to include discussion areas and policy directives that have been proven to be effective in other progressive jurisdictions. Our comments in this response are prioritized by their ability to produce the most impact to drive waste reduction outcomes. RCO offers each recommendation in the spirit of maximizing results.

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### **Disposal Levies Absent**

Jurisdictions around the world that boast higher waste reduction achievements and positive market transitions include broad-based disposal levies. Responsibly pricing the cost of pollution is important to account for full economic and environmental impacts of waste, and addresses cost disparity between disposal and recycling that is often a barrier to attract investments to expand and support more recycling, reuse, and composting. Correcting disposal values to properly reflect their long-term pollution liabilities and the loss of natural capital is fundamental to shift behaviours and create sustainable, productive markets. Disposal levies are a broad public policy approach that has the capacity to address priorities of this discussion paper virtually simultaneously:

- improve waste reduction in the institutional, commercial, and industrial (IC&I) sector;
- reduce and divert food and organic waste;
- reduce plastic waste; and
- support competitive and sustainable end-markets.

A provincial waste reduction plan that is void of disposal levies undermines the overall objective that is a basic tenet to success.

### **Disposal Bans Beyond Organics Absent**

Disposal bans are a proven and effective policy approach that provides governments the ability to target specific products and materials that may be hazardous when disposed of; prevalent in the waste and litter streams; and/or have the capacity to be managed through existing, local recycling processes, however, still end up in landfill due to a lack of market supports or other type of policy pressures (i.e., producer responsibility).

Given the barriers that exist with Ontario's relatively inexpensive disposal costs, banning materials that already have the biggest pollution impacts or where recycling solutions and programs are established, should be prioritized.

RCO recommends the following products/materials be immediately considered:

- mercury-containing products with a focus on lamps;
- organics;
- fibre-based materials such as boxboard, cardboard, and paper; and
- metals.

Domestic processing capacity exists for each of these material types, and banning them from disposal will have instant and positive effect for Ontario businesses and the environment.

### **Targets, Monitoring, and Reporting Strategies Absent**

The discussion paper recognizes the lack of progress on waste reduction and litter abatement; however, it does not offer, beyond existing aspirational goals, any specific targets or details on how proposed activities will track increases in diversion or recycling. For example, the discussion paper does not provide any insight on how to benchmark performance or track gains made from proposed initiatives. Any future waste reduction initiative implemented by the Government of Ontario must contain targets, reporting responsibilities, and mechanisms to track progress and impact.

### **Government Procurement**

*Preserving and Protecting Our Environment for Future Generations: A Made-in-Ontario Environment Plan* commits to government leadership on environmental objectives, and in particular, its procurement practices as a driver of change. The Government of Ontario is the single largest purchaser in the province, procuring \$6 billion worth of goods, services, and construction in partnership with 52,000 vendors every year.

Commitment to examine and improve its own procurement policies and practices is a direct and impactful method to prevent waste. Through its buying influences the Government of Ontario could expand producer responsibility by requiring vendor take-back services, reduce waste by changing product specifications, and expand recycling activities by forging unique private and public partnerships.

The provincial government also provides funding to a broad sector of beneficiaries, including municipalities, hospitals, universities, colleges, and schools. Although this influence was acknowledged in the environment plan there is no commitment to furthering waste reduction objectives through these funding relationships. The Government Ontario should use funding agreements and require partners to leverage their own purchasing power to support waste reduction objectives.

RCO recommends the MOECP prioritize this action.

## **Food and Food Waste Lost to Disposal**

The environment plan and discussion paper both recognize that organic materials contribute more than 35 per cent of Ontario's disposal; represents a national economic loss of \$31 billion annually; and comprises a significant source of greenhouse gas emissions in the province. RCO encourages government to prioritize action on organic waste by developing an implementation strategy with multiple short-term actions:

- Develop a province-wide disposal ban with short-term implementation timeframes.
- Government procurement requirements with all food-related vendors and service providers, as well as those that received funding, to reduce food waste.
- Focus on the IC&I sector; enforce reporting and source separation requirements from Regulations 102, 103, and 104; and proceed with a full review of these regulations to modernize and make them more effective.

The questions posed in this section of the discussion paper are linked. By banning food and food waste from disposal all actors in the supply chain will carry responsibility to ensure food waste is directed away from disposal and edible food rescued. Implementation of a ban requires careful consideration and is best phased in strategically to allow for opportunities to educate; provide time for expanded composting markets; and food rescue organizations to scale up.

RCO completed a pilot project in 2018 in partnership with the Region of Durham, Second Harvest, and Miller Waste to test the feasibility of forming regional service hubs and co-operative financial models to improve collection of food and food waste in the IC&I sector. More information is available at [RCO.on.ca/FoodWastePilot](http://RCO.on.ca/FoodWastePilot). RCO is aiming to replicate the pilot on a larger scale with broader scope in 2019.

## **Prioritize Waste Reduction in the IC&I Sector**

The discussion paper acknowledges the stagnant waste diversion rate in the IC&I sector where more than 60 per cent of material generated is lost to disposal. Unlike the residential sector, services are privately provided location by location rather than door to door in tight geographic clusters, which negates opportunity to establish economies of scale, service efficiencies that aim to reduce cost, and improve tracking and reporting. This is exacerbated by a lack of tools and resources to identify and share best practices. Existing regulations aimed at the IC&I sector are ineffective and require a full review and revamp.

### *Expand Partnerships and Program Investments*

RCO has long been advocating for regulatory improvements and program supports that educate, empower, and encourage waste reduction in the IC&I sector. We have focused program offerings custom-made for the IC&I sector at large.

### 3RCertified

In 2008 RCO was provided seed funding from the Government of Ontario to establish a certification program for the IC&I sector that would:

- encourage business, facilities, and communities to activate principles and practices of the burgeoning circular economy;
- help measure, report, and improve waste reduction and recycling practices for facilities and businesses;
- offer tools and resources that allow properties to track and report materials in a systematic and standardized way;
- support transparency of management through to final disposition; and
- link supply and value chain management decisions that support waste prevention.

In doing so, 3RCertified recognizes organizations across the IC&I sector that take a leadership position in waste reduction and diversion. Properties are awarded certification on the basis of total points earned and verified through an onsite third-party evaluation.

Central to the program is a set of criteria available to active applicants in a questionnaire format. The criteria aim to capture the various ways an organization integrates its solid waste diversion and management program into operations and planning. The applicant organization earns a specified number of points for each criterion that it meets. Certification is awarded at one of four levels based on the total number of points earned.

As the program grows, so will the 3RCertified database of externally verified diversion, capture and per unit reduction rates, which allows participants to better understand and benchmark performance. Annual aggregated data will be reported once the program gains critical mass of certified organizations.

The discussion paper also poses the following:

1. What types of initiatives do you think would result in effective and real action on waste reduction and diversion for the IC&I sector?
2. How do we get accurate information on waste reduction and diversion initiatives in the IC&I sector?

It is our assertion 3RCertified responds to these questions and beyond. The program is market-based and uses compliance with current regulations as baseline for entrance. It is a voluntary tool that requires a modest initial investment by the applicant, and provides valuable tools, information, and resources for tracking and reporting performance, as well as information on how best to improve. Operating cost reductions from reducing waste post-certification generally supports the application fee. It has customized modules for the variety of IC&I property types and generators as reflected in the 3Rs Regulations and offers tremendous opportunity for applicants to build profile for achieving 3RCertified status.

The government should consider partnering with RCO to explore ways to scale up this program to address the collective waste reduction objectives that we share.

### *Regulatory Review*

RCO supports government commitment to prioritize waste reduction improvement in the IC&I sector starting with a full review of the 3Rs Regulations 102, 103, and 104. Regulations should, at a minimum, set mandatory reduction and recycling targets, as well as reporting and auditing requirements. Government also needs to have the resources to sufficiently enforce these regulations and support programs and resources to aid compliance.

### *Data and Reporting*

Local governments manage household waste and recycling as a matter of public safety, human health, and environmental conservation. The introduction of stewardship regulations has further entrenched the role of municipalities as they expand and improve materials management operations; and build standardized program structures that allow them to collect and report detailed data, set benchmarks, and identify best practices. As public entities that are subsidized by taxpayers, municipalities operate openly and transparently, which facilitates some harmonization and standards setting. Data reporting and analytics for waste and recycling have always been part of the responsibility of public sector materials management. For some materials, particularly those under regulation and subject to stewards' reimbursement, these data sets are reliable and robust.

Materials management in the IC&I sector is predominately serviced by the private sector, which is not required or motivated to share data for business and proprietary reasons. Materials move according to either service requirements and/or economic opportunity. Data reporting is not standardized at the point of generation nor by service providers (through billing or transport documentation).

Although some material records are kept for permitting processes, these are limited to a subset of hazardous wastes, are not verified, and face significant time delays. Figures and reports are not required to be made public by government.

A critical function of 3RCertified is data collection and analysis. Data reporting and measurement tools are designed to provide applicants with specific information about their current performance, including types of waste materials they generate, and what is sent for recycling and lost to disposal. These reports are based on third-party verified audits that include proof of final disposition. These data points are detailed and offer a facility by facility account of performance. The tools can provide aggregated data reports to the province and public, as well as sub-sector snapshots of performance.

### *Sector Support*

Through research and program experience, RCO has a strong understanding of the barriers that limit improvements in waste reduction in the IC&I sector.

Although Ontario is one of the only provinces in Canada with waste reduction requirements for the IC&I sector, as currently composed are notably vague, ineffective and rarely enforced. It is important to note that these regulations only obligate IC&I buildings of certain sizes while the majority of the waste is generated by those under these thresholds. In addition, despite requiring annual waste auditing and development of waste reduction plans, the regulations have no specific performance requirements (diversion rate) nor specific auditing protocols or standards. Similarly, although there is requirement for waste reduction plans, there are no recognized best practices nor requirements for generators to submit data. Consequently, value of auditing and planning is lost.

The IC&I sector is also broad and diverse, and, therefore, difficult to pinpoint one policy tool or program that can address all barriers. Unlike the municipal sector, there are few opportunities for peer to peer knowledge sharing of best practices. The sector is serviced by the private sector on a facility by facility basis with limited capacity to co-ordinate services within service hubs and explore service efficiencies as they have been realized by municipalities. Also, there are virtually no resources nor measurement tools for the sector to measure performance and benchmark.

RCO has developed some of these resources and tools within the 3RCertified program.

### **Expand Extended Producer Responsibility (EPR)**

RCO has long been a strong advocate for EPR as important policy to reduce waste, and supports the environment plan's recognition of it on page 40:

*We believe that producers should be responsible for managing the waste they produce. Placing responsibility squarely on those who produce the waste will help unleash the creative talents and energies of the private sector. Making producers responsible for the full life-cycle of their products and the waste they produce will help companies to consider what materials they use in and to package their products, and find new and innovative cost-effective ways to recycle them and lower costs for consumers. It can also make recycling easier and more accessible right across the province, keeping it clean and beautiful.*

Producers have the most influence on the design and delivery of their products and services, and should be accountable for the environmental impacts of their goods past the point of purchase and use. RCO encourages the MOECP to prioritize and continue the transition of existing producer programs to the *Resource Recovery and Circular Economy Act (RRCEA)*, including waste electrical and electronics, municipal special and hazardous wastes, and printed paper and packaging (PPP).

This transition is critical as it allows for numerous benefits:

- Greater and direct alignment between individual producer accountability with responsibility while allowing producers flexibility to manage their obligations.
- Shifts costs away from municipalities and their taxpayers.
- Provides opportunity to expand the list of targeted products and materials for each transitioning program, in particular, opportunity to expand the scope of obligations to include the IC&I sector.
- Designates new products and materials that are toxic and/or prevalent in the waste stream.
- Meaningful targets and consequences for non-compliance.

### **Blue Box Transitions**

The MOECP has an important and unique opportunity to transition the Blue Box Program for PPP to full producer responsibility and should consider this transition directly through new designation under the RRCEA. This will provide opportunity for municipalities and producers to support a timely Blue Box transition and prepare operations and businesses for new roles and responsibilities under a full producer responsibility model.

Successful transition of the Blue Box Program from its current cost-shared model to full producer pay depends on several critical aspects:

- No service interruptions for residents.
- Transparent, orderly, and timely transition for and from the municipal sector.
- Open and fair market opportunities for producers and service providers during and post- transition.

Stakeholders have invested significant time and resources to date to ensure a successful transition to full producer responsibility for PPP. The MOECP would be well served to leverage the productive work already completed. Municipalities and producers have identified a phased approach based on a self-declaration process that requires a certain percentage of local governments to transition annually, with those that transition eligible for 100 per cent of Blue Box service costs subsidized. During the transition municipalities would be required to ensure service levels are maintained or improved regardless of timing.

Unlike other existing stewardship programs, the Blue Box Program requires a phased transition under a longer timeframe whereby Stewardship Ontario (SO) will maintain its role to collect producer fees and remit payment to municipalities that remain in the cost-share model. It is reasonable to expect a longer wind-up period as compared to other programs, such as the Ontario Tire Stewardship and Ontario Electronic Stewardship.

Therefore, it is critical to ensure open and fair market opportunities exist for producers, producer agents, and service providers during a transition. SO will remain the agent for producers for the portion of PPP that is serviced under the municipal cost-share model; however, it is critical producers have flexibility in how they manage their new obligations for the portion of the PPP that they are 100 per cent responsible for.

An important aspect of an open and fair market is to ensure producers have access to data and information throughout the transition for all PPP they put onto the market, and opportunities are made available for new partnerships that may be forged.

To support these critical aspects RCO recommends the Government of Ontario consider a third-party organization as a temporary clearinghouse, which would bear responsibility to house producer and municipal PPP information, protect critical data, and make information available to all interested parties as they re-establish themselves under the individual producer regulatory framework. This model has been used successfully in other jurisdictions and outside expertise can be leveraged.

### **Blue Box Material Standardization**

The discussion paper poses the question about harmonizing Blue Box materials and the potential benefits of doing so. Standardizing materials will require municipalities and producers to agree on what packaging should (and should not) be collected across the province, as well as a set of criteria to guides such a list. It is likely that criteria will be based on whether materials are recycled universally and successfully, which indicates they have stable and consistent markets available to them. This may result in some materials being removed altogether from the Blue Box Program and cause the overall PPP diversion rate to drop. If this occurs, it is imperative that producers continue to pay the full cost of the impacts of their PPP if it is redirected to disposal applications.

### **Expanding Producer Responsibility for PPP in the IC&I Sector**

There is a significant opportunity to improve the overall diversion rate of the province by expanding the scope of PPP generated by the IC&I sector. By modifying regulation to include the IC&I sector the province could harmonize a list beyond residential sources and make common what Ontarians can recycle at work and at home. Expanded service also provides economies of scale and incent private sector materials managers to invest in collection and processing infrastructure within the province of Ontario because of the increase in supply. Ancillary benefits include expanding local economies and creating significant job opportunities.

### **Expanding Producer Responsibility Beyond PPP**

The Government of Ontario joined provincial counterparts and made commitments to expand producer responsibility to additional products and materials under the *Canada-wide Action Plan on Extended Producer Responsibility (CAP-EPR)*. Ontario agreed to target several products and materials in a two-phase approach. Although this commitment was made in 2009 Ontario has not progressed on products and materials. RCO would encourage the province to move on this commitment and designate these materials under the RRCEA.

From CAP-EPR (page iii)

### ***Phase 1***

*Jurisdictions commit to working towards managing the following products and materials in operational EPR programs within six (6) years of the adoption of the CAP:*

- *Packaging*
- *Printed materials*
- *Mercury containing lamps*
- *Other mercury-containing products*
- *Electronics and electrical products*
- *Household hazardous and special wastes*
- *Automotive products*

*Existing product stewardship, non-EPR programs, which were established before the adoption of the CAP will be reviewed within the context of the CAP within six (6) years of the adoption of the CAP.*

*Jurisdictions will seek within two (2) years of the CAP's adoption to identify a more detailed phased implementation plan for the product categories and products listed in Phase 1.*

### ***Phase 2***

*Jurisdictions commit to working towards incorporation into operational EPR programs within eight (8) years of the adoption of the CAP for each of the following product categories, of specific identified products and materials as further elaborated upon by CCME*

- *Construction materials*
- *Demolition materials*
- *Furniture*
- *Textiles and carpet*
- *Appliances, including ozone-depleting substances (ODS)*

*Jurisdictions will seek, within two (2) years of the adoption of the CAP, to publish a detailed list of products to be managed through EPR programs for each of the above, Phase 2, product categories.*

## **Reducing Plastic Waste Going into Landfills or Waterways**

The consequences of plastic waste to humans and the environment are well documented, and progressive jurisdictions are coalescing to find solutions. Plastics are ubiquitous and utilized in almost all aspects of daily life. In that regard, it is important to note that plastic waste goes well beyond packaging and mitigation must consider commercial and industrial use. RCO considers the following necessary to make impactful improvements to plastic waste.

### **1. Focus on the source**

Plastic waste and marine litter are the result of poorly designed products and packaging, and irresponsible management at end of life. Policies and market shifts can play a key role in addressing these symptoms and ultimately the root problem.

### **2. Create sustained markets that demand post-consumer plastics**

Policies and market support are required to motivate producers to choose plastics that preserve value after single-use and reintegrate them as feedstock in the production process. At present, recycling markets compete with cheap disposal, and the recycling industry requires a consistent source of materials in order to fill production cycles. Manufacturers and producers may not fully understand nor consider end of life management costs of materials they choose, and therefore, are not incented to make improvements. Policies and market support should redirect materials away from disposal and into recycling. Creating sustained markets that fulfill demand may take intersecting policies that offer incentives and disincentives. There is extensive research and policy applications that have tested the effectiveness of approaches from which Canada can draw.

### **3. Integrate circularity into government procurement**

Organisation for Economic Co-operation and Development countries spend 12 per cent of their GDP on public procurement. With a \$1.9 trillion GDP Canada spends \$230 billion on procurement alone. The Government of Canada purchases \$16 billion worth of goods and services every year. Governments have unrealized potential to advance circular economy models and principles through purchasing and procurement that can meet environmental and economic objectives, including those specific to reducing plastic waste. By applying circular procurement principles governments can drive market shifts through service agreements that favour access over ownership, change vendor relationships to require product take-back, and integrate specification that minimize plastic or require products designed to be easily recycled.

### **4. Grow domestic recycling solutions**

Canada and other G7 nations are dealing with prohibitions and restrictions introduced by China, the world's largest recycling end-market for plastic. China's historical demand for material collected by Canada's public and private service providers contributed to a shortage of ongoing investments in local plastic recycling markets.

The combination of cheap disposal, lack of infrastructure, and over-reliance on foreign markets has made Canada vulnerable to losing recyclable plastic to disposal. A plastic strategy must encourage and support domestic growth in recycling industries to manage and process material locally.

5. Develop standards in co-operation with other provincial and federal governments

Canada has a patchwork of policy approaches to waste reduction and recycling, and suffers from disparities that affect provincial performance and markets. There is no consistency in data reporting, measurement, or definitions of recycling and/or disposal. There is also an absence of benchmarking and goalsetting that causes substantial variance in performance. According to Statistics Canada's biannual reports on waste, the only national data available on this topic, provincial diversion rates range from as low as 15 per cent to as high as 40 per cent.

Setting standards also addresses the issue of clearer rules for compostable products and packaging. Scoping out EPR packaging regulations under the RRCEA to include compostable material introduces a mechanism to collect data on the amount sold in Ontario and their respective costs and performance in municipal composting management programs. This data can then be used to guide future policy direction.

6. Require resin-specific targets for the PPP under the RRCEA

At present plastics collection and recycling performance are measured as one material category despite seven common and different plastic resin types on the market. Each has unique collection and recycling performance rates. It is common for underperforming resins to be carried by better performing types. To improve transparency and consumer education regarding purchasing choices for packaging that has the highest recycling performance rates, RCO suggests resin-specific targets in RRCEA regulations for PPP. Furthermore, as collection and processing capacity increases and improves, the MOECP should consider disposal bans for those resins that have stable and sustainable markets.

### **Thermal Treatment of Waste**

RCO supports production and consumption cycles that keep materials and resources at their highest use at all times; maximizes their value in their current state for as long as possible; and extending their life by using them as inputs in new production activities.

Thermal treatment of waste, while providing opportunity to extract embedded energy from materials, is a short-term and limited use of the inherent value of materials. If not narrowly used, highly regulated and monitored properly, thermal management could displace more valuable reuse and recycling applications. While thermal treatment presents more value than landfilling, it severely limits the opportunity to leverage full or potential value of materials. Consequently, it may demotivate the marketplace to innovate and invest in preferred post-consumer applications, and eliminate incentive to improve materials/product designs that integrate environmentally superior options at end of life.

Therefore, it is crucial to ensure that thermal treatment is considered disposal and does not count toward diversion targets made under regulation or claims made in voluntary reporting.

Thermal treatment facilities require significant investment and only make good on those investments if supply of materials for burning are readily available. This market dynamic may mean that recycling industries begin to compete with thermal applications for the supply materials.

Responsible jurisdictions that have chosen to manage disposal through thermal technologies rather than landfill have done so under high diversion performance targets and strict reporting requirements that track landfill use, thermal treatment, and recycling activities separately and transparently. This ensures that effects of thermal management are public; maintains recycling as a preferred option; and avoids perverse markets shifts that redirect valuable materials to recycling rather than lost to thermal applications or disposal.

RCO recommends the MOECP undertakes the following activities prior to considering thermal technologies as a waste management strategy:

1. Global scan of jurisdictions that permit thermal treatments of waste and examine impacts and costs with particular focus on waste diversion performance.
2. Publicly list, for comment, materials that the MOECP considers safe and economically viable for thermal treatment with clear rationale for each.
3. Conduct a full economic and environmental impact analysis:
  - a. Full costing of infrastructure and operational, short- and long-term, for thermal treatment of materials.
  - b. Potential short- and long-term effects on the recycling industry.

### **Prevent and Reduce Litter in Neighbourhoods and Parks**

Better management of materials to prevent and clean up litter provides an important educational opportunity to engage the public on a visible and widespread issue. A province-wide co-ordinated day of action on litter could provide an important opportunity engage Ontarians broadly on the consequences of waste lost to disposal or litter, and its value if redirected into recycling applications. It is also an opportunity to rally support from all stakeholders, including municipalities, businesses, schools, environmental groups, and the general public to collectively work toward a common goal, particularly in our parks, and recreational and conservation areas.

#### *Days of Action*

RCO has established partnerships with thousands of schools, municipalities and businesses across the province that recognize and celebrate Earth Day (April) and Waste Reduction Week in Canada (October), two annual milestones where RCO keeps the issue of waste top of mind and emphasizes that every action count. By partnering with RCO, the Government of Ontario could leverage its existing relationships, program collateral, and communications and media channels to develop and implement a day of action on litter from an existing platform. RCO has the capacity to attract private sector partnerships, as well media, to support campaign success.



## *Prevention*

Preventing litter relies on dedicated resources that engages consistent and heightened public awareness, expands education, and accesses recycling options in all public regions of the Ontario that goes beyond a single day of action. RCO has the capacity to unite private and public interests to initiate a sustained litter prevention program. This initiative, funded by public and private partners could create program resources to support front-line community action, including clean up kits, as well as sample communication and media engagement resources. Through an online storefront, RCO could provide these types of resources, and profile individual community and business efforts.

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*Reducing Litter and Waste in Our Communities: Discussion Paper* is a thoughtful engagement tactic to offer stakeholders a valuable opportunity to provide feedback on waste and litter across Ontario. We offer our feedback in the spirit of collaboration and thank you for your consideration.

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".

Jo-Anne St. Godard  
Executive Director  
Recycling Council of Ontario  
416.657.2797, ext. 3  
[joanne@rco.on.ca](mailto:joanne@rco.on.ca)  
[RCO.on.ca](http://RCO.on.ca)