

Comments from members of the Environmental Stewardship Advisory Committee on the provincial discussion paper 'Reducing Litter & Waste in Our Communities'

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Members of Environmental Stewardship Advisory Committee (ESAC) strongly support increased restrictions on plastic bags, aluminum cans and other convenience consumer products which, when discarded, have a detrimental effect on our ecosystems. To the extent possible, single-use plastics should be banned / disincented in favour of alternative less-detrimental methods to carry food or wrap consumer goods. We welcome more research into alternatives for plastic in wrapping and bags, and increased enforcement of fines for littering, and we support measures to encourage citizens to stage litter collection days at public facilities (including provincial grants to verified environmental groups to offset organization costs).

There is resistance to any government measure seen as a 'tax' but, in light of recent news of the level of microplastics in animals and humans, the shipment of non-recyclable plastic to other countries and many other examples of non-sustainable activity, we suggest that there is growing public support for legislation and regulations that would provide financial incentives to reduce waste and litter, and to penalize the opposite behaviour.

The province should orchestrate dedicated and concerted action to reduce litter and waste, in the manner that environmental groups coordinate events for climate action. A period of a week would be superior to a single day, to engender a sustainable perspective and allow all community members to participate at some point. This activity would require extensive awareness of the rationale for its importance, and could serve as a link for future action. The province could consider legislating a public holiday to observe the importance of action on litter and waste.

Regulation, education and enforcement are the most effective ways to change behavior. Standards must improve the labelling of plastics and other recyclable materials to allow easy sorting.

The province could consider regulatory authority for municipalities to impose to a surcharge on drive-through purchases at fast-food outlets. This would reduce litter by encouraging customers to go inside and use refillable cups, and use waste containers to avoid ejection through a car window, as well as reduce emissions from car idling. Fast-food outlets should

be encouraged to clean litter from their parking lots and proximate properties, through positive publicity for those that assume responsibility or a tax surcharge to those that do not.

The bottle deposit concept could be expanded to cover non-alcoholic containers, soda cans, tetrapaks, juice containers, etc. At minimum, this financial reward would provide revenue for economically-marginalized people (bidders) who can supplement their social assistance by collecting containers and reducing the quantity of litter. Consider 'reverse' vending machines where consumers earn a deposit for returning plastic containers.

Government could offer subsidies or tax credits to developers of multi-unit residential building who include waste diversion infrastructure, similar to measures for electric vehicle charging.

A province-wide system could be developed to encourage safe reuse and donation of surplus food, including support for "food runners" who deliver leftover food to charities or people who need it. Although this commodity is highly compostable, it is an unnecessary waste of a valuable resource and perpetuates the idea that any commodity should be wasted.

Awareness includes the need for more education on portion sizes in food outlets, and the need to reduce waste to lower the impact on landfill, as well as the nutrition impacts for the individual. A system could be developed to track and quantify the amount of diverted waste and the amount that is recycled, in the manner of the United Way thermometer target.

Public institutions should provide potable water stations for bottle refills, as well as waste disposal and diversion bins. This should become standard practice at special events and festivals, as well as locations near fast-food outlets and convenience stores.

Harmonizing acceptable blue box items should be accompanied with an updated educational communications strategy promoting the 3 R's, where there would be clarify on what can be recycled and diverted. Establish and update a list of hazardous materials like the REACH list of the EU.

It must become more costly to pollute than to divert, and governments can enforce the 'circle economy' by setting regulations and standards which encourage use of recycled materials and end-of-life recovery. Waste management is not a voluntary self-regulation practice, and incentives should be provided to sustainable initiatives.

Waste management companies should record what they collect and from which sector, in order to provide a statistical basis for on-going tightening of regulations. These data should be released in non-aggregated form, so consumers can identify lagging producers and problem areas.

There is absolutely no argument against the goal of reducing plastic waste going into landfills or waterways; the only debate is how best to achieve higher aspirations. All fish tested in

Lake Ontario had plastic in their stomachs, compared with 10% of fish in the oceans. Provincial and municipal governments must act now to address this issue by banning non-recyclable single-use plastics and implementing producer-funded deposit programs.

Producers must be responsible for end-of-life product lines. Compostable producers must prove the product is compostable, and definitions and guidelines of 'compostable' need to be clarified and certified. Facilities must be required to process compostables and this action may require grants, subsidies or credits.

Governments must harmonize the acceptable list for our blue box programs to minimize confusion and maximize compliance.

The 'waste' of energy in our community is a significant but, unlike litter, it is invisible. Other countries require steam, heat or energy recovery, which not only reduces detrimental impacts on our environment, but also decreases depletion of valuable resources. At the individual level, concerted emphasis on energy conservation and efficiency through building insulation and other well-known concepts, would yield a wide range of societal benefits.

The ICI sector in Ontario diverts only 17% of waste versus 50% for residential. The focus must be placed on ICI to change its practices which will accelerate targets for waste diversion. Legislation and enforcement, supplemented with a communications strategy, will force a change in behaviour towards environmental stewardship. Full producer responsibility is a requisite step to reduce waste at source.

Business will do 'the right thing' only if it is the most cost-effective thing. Increased and consistent environmental regulations are needed to control hazardous materials, plastics, chemicals (including pharmaceuticals) and transportation fuels.

A significant volume of landfill is wood packaging material (pallets). Most pallets can be reused numerous times, but recycling is not industry practice due to the low commodity value and the relatively high cost of maintenance. Implementation of a dumping fee would discourage unnecessary disposal (and decrease the quantity of timber needed for construction of pallets) and companies which "rent" pallets via a refundable deposit should be encouraged. Pallets used for export must be heat-treated under the ISPM-15 standard to prevent spread of phytosanitary insects such as Eastern Ash Borer and, despite the cost, most pallets are treated since the final use is unknown and it is easier to treat all pallets than to separate supply chains. Heat treatment raises the thermal content of wood and increases its suitability for use as biomass pellets, a renewable energy for heating buildings which is Ontario's highest end-use application of energy. Treated pallets are clearly identified by the ISPM label, so a method of collection would allow the province to valorize this resource, decrease GHG emissions and energy consumption, and promote effective reuse of packaging which will avoid landfill.

There is need to raise awareness of the short-term and long-term societal costs of waste and litter in schools and among all community groupings, including new Canadians.

This discussion paper contains many solid principles which can form the basis for strong action at the provincial and municipal levels, but it is important to prioritize implementation of these measures to ensure that we go beyond nice words.

ESAC supports the move to full producer responsibility, but it is important to ensure that everyone in the community has a clear understanding of the lifecycle impacts of the products we use and the true societal cost of litter and waste. Municipalities should have greater power to implement all relevant measures to reduce litter and waste, from carrots for positive actions to sticks for wasteful activities.

This paper presents an important opportunity for Ontario (and Ottawa) to become a leader in the reduction of litter and waste. We hope that there is sufficient political will to seize that lead.