

Previous Waste Management Comments and How Addressed in Proposed Regulation

Niagara Region Comments	How Addressed in Proposed Regulation
<p>All community events should be mandated to have diversion programs (twinned with garbage) and the Province should provide funding for volunteers to help sort waste properly at events. Public events should be waste-free and generate only acceptable recyclable and compostable material.</p>	<p>Under the proposed regulation producers would be required collect blue box material from public spaces where eligible communities provide garbage collection at the public space and streetscapes within the business improvement areas. Where the public space is a park or playground, producers are to collect throughout the year and locate receptacles at entry or exit points, and other areas where persons congregate.</p> <p>Blue Box receptacles are to be placed next to every receptacle for garbage at the public space.</p> <p>Producers will not be responsible for providing additional Blue Box receptacles in parks during community events where there maybe a need for increased receptacles.</p>
<p>Niagara Region supports a consistent Provincial approach to standardization of materials accepted in the Blue Box program that should be done as part of the change to full producer responsibility. To achieve this, materials should not be removed from the program and if they are, alternative approaches for disposal must be considered, with producers paying for management of the material in the waste management system. Consumer convenience should be maintained or improved, and access to existing services should not be negatively impacted by any changes to Blue Box program.</p>	<p>The proposed regulation designates Blue Box materials under the RRCEA that producers would be responsible for collecting and managing which are items made from paper, metal, glass, plastic, or any combination of these materials including:</p> <ul style="list-style-type: none"> • packaging • printed and unprinted paper • non-alcoholic beverage containers • single-use packaging-like products such as foils, wraps, trays, boxes, bags • single-use items such as straws, cutlery, plates and stir sticks <p>Currently, Niagara Region's Blue Box program does not accept all items that will be designated such as straws, cutlery and stir sticks.</p> <p>Niagara Region does currently accept books (hardcover's removed) in the Blue Box program which is currently not included in the proposed regulations.</p>

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	<p>Through a common collection system, producers would be required to collect a consistent set of materials across the province. The proposed regulations do permit alternative collection systems provided certain conditions are met.</p> <p>The proposed regulation would require producers to maintain service types, standard, and levels the same as delivered by the municipal program between 2023 and 2025; however, after December 31, 2025, the service standards for eligible sources contained in the proposed regulations would apply (i.e. Blue Box material collected at least every-other-week and those municipalities currently receiving curbside collection would retain curbside collection).</p>
<p>Niagara Region is supportive of initiatives that target waste reduction and diversion in the ICI sector. Niagara Region currently offers unlimited curbside recycling and organic pick-up service to small and medium sized businesses. We have created an environmental program specific to businesses: Rethink Your Waste at Your Workplace. This recognition program includes an educational component and rewards businesses that make</p>	<p>The ICI sector is not included in the proposed regulation as an eligible source; however the province has indicated they intend to move forward on the IC&I waste framework in the coming months and will include stakeholder consultation.</p>

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<p>efforts to maximize their waste diversion efforts.</p> <p>Similar voluntary programs have been in existence for a number of years, however, to make tangible progress towards reducing and recycling waste in the ICI sector, it would be beneficial to establish mandatory Provincial targets with firm timelines for the sector.</p> <p>Municipalities need to be compensated for ICI materials that are municipally collected as part of the integrated collection system.</p>	
<p>Niagara Region recommends the expansion of program service levels at multi-residential locations notwithstanding the challenges that may be presented including older buildings not designed for multiple waste streams and with space restrictions. Funding for upgrades supporting diversion in existing locations would encourage participation and new buildings should reflect design for proper waste diversion through approval processes. In many urban centres an increasing amount of the population resides in multi-residential locations and these residents must have access to the same programs as residents in the low-density residential sector. This also applies to residents in mixed-use properties.</p>	<p>The proposed regulations define eligible sources which include all residences, multi-residential properties, long-term care homes, retirement homes, public and private schools and public spaces.</p>

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<p>In addition, schools should be an eligible source, whether or not they are collected as part of a residential collection route.</p>	
<p>Niagara Region also supports designation and full producer responsibility of new materials such as additional electronics (appliances, electrical tools), florescent bulbs and tubes, mattresses, carpets, clothing and textiles, furniture and the bulky items.</p>	<p>Not addressed.</p>
<p>Niagara Region requests the Province take a firm stance, for example, designating all packaging, whether it is recycling or compostable. Producers should pay for management of designated materials regardless of the stream in which they end up. Niagara Region also supports designation and full producer responsibility of new materials such as additional electronics (appliances, electrical tools), florescent bulbs and tubes, mattresses, carpets, clothing and textiles, furniture and the bulky items.</p> <p>The list of designated materials should be reviewed and items such as construction and demolition waste included under producer responsibility.</p>	<p>Producers of compostable products are not subject to the management requirements but are subject to the reporting requirements.</p>

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<p>Fibre such as paper products intended for hygienic use (paper towels) diverted as part of the organics stream or other obligated/targeted materials diverted through other systems should be an eligible program cost for which municipalities should receive payment and appropriate targets/measurements should be developed.</p>	<p>Not addressed.</p>
<p>Regulations should allow for addition of obligated materials as technology advances and products continue to evolve. Newly added materials should have management targets in early years to ensure they are not disposed at the expense of municipalities.</p>	<p>Although the proposed designated materials encompass a wide range of materials, the proposed regulations do not speak to the addition of obligated materials.</p>
<p>Niagara Region's position is that individual sectors should have their own measurable targets and metrics (LDR, ICI and Multi-Residential). Targets should be reassessed at defined intervals to promote continued improvement of diversion rates. Creation of data collection mechanisms to measure progress in waste reduction and resource recovery is vital. Development of standards and targets that reflect a minimum of the current state i.e. minimum diversion targets set for the LDR (that are at least as high as current achievements) should be maintained during the transition.</p>	<p>The proposed regulation sets diversion targets based on the weight of Blue Box materials supplied in one of six given material categories and are not by sector or individual materials. Targets are set for 2026-2029 and 2030 and beyond.</p>

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To increase program effectiveness, Niagara Region supports individual recovery targets for individual materials. Despite the current challenges associated with recycling certain materials, such as multi-layer packaging, and the widespread use of single-use packaging, producers must be held accountable.	
Niagara Region encourages inclusion of positive incentives to go beyond minimum targets in addition to penalties for producers not meeting targets. Incentives supporting the use of secondary materials over virgin material such as tax incentives or other financial benefits would support and recognize producer efforts. Targets should be re-assessed on a pre-defined schedule and progress monitored to ensure continual improvement.	Not addressed.
To reduce financial impact on any municipalities who do not transfer in the early phase, payment of net verified costs (actual municipal costs) from Stewardship Ontario (SO) should be increased to 75% in year one increasing annually until transition is complete, through authority by the Minister. Niagara Region also does not support application of in-kind advertising (funding) for	Not addressed

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<p>newspapers for either non-transitioned or transitioned municipalities.</p>	
<p>Transition plans particularly for the Blue Box program must address municipal contracts and assets and how to avoid stranded assets. Transition to a producer responsibility regime could lead to Niagara Region's Recycling Centre becoming a stranded asset depending on the strategies put forth to achieve producer responsibility.</p> <p>The transition plan must clearly address provision of fair market compensation for stranded municipal assets. Provisions for maximizing use of existing infrastructure should be included. For example, the plan should clearly incentivize use of existing facilities or otherwise potentially stranded assets (i.e. equipment, rolling stock, carts and boxes) and/or any amortized capital costs that extend beyond the transition date, should be factoring into municipal considerations for compensation.</p>	<p>Not addressed</p>

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<p>The province's plan must provide appropriate details (e.g. catchment areas if applicable) and timelines so that municipalities can make an informed decision whether to bid on processing services, divest themselves of facilities or formulate public/private partnerships.</p> <p>In preparation for a shift to producer responsibility, some municipalities, including Niagara Region, have included or will be including clauses in future collection and/or processing contracts to allow for early termination. Many of these clauses require a significant period of notice to contractors (e.g. six months to a year), placing further importance on the province to provide appropriate notice, details and timelines for municipalities.</p>	<p>The proposed regulation provides a transition schedule by year but no specific dates within the year has not been identified in proposed regulations. The Province will consult on specific transition dates and include them in the final regulations.</p> <p>Niagara Region is scheduled to transition in 2024, despite the preference to transition as early as possible on January 1, 2023.</p>
<p>Waste reduction (avoid waste generation) followed by reuse, and recycling (including composting) should continue to take priority in the definition of diversion. Targets to address reduction and reuse should also be developed as higher value objectives. Use of alternative recovery methods such as energy or chemical recovery is preferable to landfilling materials.</p>	<p>The proposed regulations have included re-use as a way to achieve targets.</p> <p>Recovered resources can not be accounted for if supplied for use in a product that is land cover (unless certain conditions met), are supplied for use in a product that is fuel or a fuel supplement or supplied to an incinerator or landfilled.</p>