

Waste Management Comments on Specific Proposals in Environmental Plan

Reference in Proposed Environmental Plan	Staff Comments
Addressing Climate Change	
We will work with partners on ways to make it easier for residents and businesses to waste less food or reuse it for beneficial purposes such as compost. (p 31)	Niagara Region supports the Ontario Food Recovery hierarchy consisting of the following steps in order of importance: (I) Reduce; (ii) Feed People; (iii) Recover Resources. When considering recovery rates it is important to consider the parameters used to in the calculation. Comments on other action items in this plan specifically reflect Niagara Region's position that individual sectors in the province should have their own measurable targets and metrics
Quick Fact: About 60% of Ontario's food and organic waste is sent to landfills which emits methane – a potent greenhouse gas – when it decomposes. Efficient diversion of household waste from landfills is an important tool in the fight against climate change. To read more about our plan to fight litter and waste, see page 40. (p 32)	Niagara Region's position to date, reflected in the Province's Food and Organic Waste Framework, is that actions focusing on prevention of food and organic waste are critical. We also support the Province's expanded vision to take a systems approach to food and organic waste generation, management and recovery, recognizing that all stages of supply and production have a role to play in moving towards a circular economy.

Waste Management Comments on Action Items in Environmental Plan

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Expand green bin or similar collection systems in large cities and to relevant businesses. (page 41)	Niagara Region supports this action and currently offers organics collection for small to medium sized Industrial, Commercial and Institutional (ICI) properties. Carts are priced for cost recovery only, encouraging participation.

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	<p>Provincial plans should specifically reflect expansion and targets for ICI and high and low-rise multi-residential (multi-res) sectors as participation rates for these sectors are typically lower than for Low Density Residential (LDR). Multi-res high-rise buildings may face unique challenges with respect to collection of organics materials, depending on age and design. Collection of organics must be as convenient as garbage collection is to encourage participation and improve program participation rates in these sectors.</p> <p>The Province should also consider public spaces and community events as a sector to target (e.g. festivals generate food waste). Some municipalities, including Niagara Region, already offer organics collection at special events.</p> <p>As noted in previous EBR comments on the Province's Food and Organic Waste Framework, parameters to be used for measuring success, and the detailed calculation to establish a baseline and future measurement for the percentage of waste reduction and resource recovery, need to be defined, separately, for each sector. The Province should work with all stakeholders to establish timelines, as municipalities must budget and plan for processing capacity and end markets must be identified. Additionally, beneficial activities such as on-site management of organics through grasscycling and backyard composters should not be reduced through implementation or expansion of organics collection programs.</p>

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Develop a proposal to ban food waste from landfill and consult with key partners such as municipalities, businesses, and the waste industry. (p 41)	<p>Niagara Region is supportive of a disposal ban, as noted in previous EBR comments on the Province's Food and Organic Waste Framework.</p> <p>Materials to be included in the ban must be clearly defined and the program should be further expanded to include branded (non-food) organics, including compostable packaging and other materials, some of which may already be acceptable in local programs (e.g. leaf and yard waste and pet waste).</p> <p>A disposal surcharge could potentially be used in conjunction with a ban to provide some allowance for incidental amounts of designated materials.</p> <p>Disincentives in the form of levies/penalties are needed to discourage private sector facilities from accepting banned materials.</p> <p>In order for bans to be effective, targets must be established and implementation time is needed between diversion program start, target dates and enforcement of a ban. For example, Niagara Region currently collects from LDR, ICI and multi-res locations in the same routes, and phased-in targets might be different for each sector. Participation and contamination rates currently vary by sector and this may make thresholds for compliance and enforcement more challenging. Implementation time between the various sectors should be done within reasonable time limits in order to ensure consistency in messaging to the public.</p> <p>Compensation to municipalities should be provided for any additional costs related to disposal bans, as food and organics are costly waste streams for municipalities to collect and process. The Province must provide the necessary oversight and enforcement resources to ensure compliance of disposal bans.</p>

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	<p>Timelines are critical for planning by municipalities as many, including Niagara Region, have a tonnage threshold at which the processing costs increase, and many municipalities have little or no excess capacity.</p>
<p>Educate the public and business about reducing and diverting food and organic waste. (p 41)</p>	<p>Niagara Region's position, as noted in previous EBR submissions for Ontario's Food and Organic Waste Framework, is that actions focusing on prevention of waste, including education, are critical in attaining goals minimizing the amount of food and organic waste to be disposed of. Niagara Region will continue to develop Promotional and Educational material (P&E) and programs aimed at preventing food waste, for example by participating in and leveraging work completed through the Ontario Food Collaborative (OFC) and other initiatives. Province-wide P&E messaging to prevent food waste is supported.</p> <p>To date, Province-wide P&E messaging on organics diversion collection programs has been difficult to deliver and may contribute to resident confusion due to the differences between municipal processing systems and the various materials that can be accepted in each system. Also P&E needs to be customized to reflect needs of different sectors, such as lower participation and higher contamination rates experienced by the multi-res sector.</p> <p>Niagara Region's residential food/organics diversion program rate is less than 50% based on a 2015/2016 waste composition study. Participation rates in organics programs for the ICI sector tend to be even lower (in Niagara between 6% and 14% of ICI properties in downtown business areas use organics, according to audits completed between 2014 and 2018). Although education programs do</p>

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	work, further actions are required. Niagara Region had suggested in previous comments for the Food and Organic Waste Strategy that food waste reduction in the ICI sector could be better achieved through provincial policy/legislative changes such as policies similar to those in France/Europe that allow for and reduce risk to retailers when donating food as well as incentives to reduce food waste at the producer/retail level.
Work with other provinces, territories and the federal government to develop a plastics strategy to reduce plastic waste and limit micro-plastics that can end up in our lakes and rivers. (p 42)	Similar to our position regarding food and organic waste, Niagara Region believes that actions focusing on reduction and reuse are critical. Municipal waste management systems must currently handle plastics at the end of the lifespan, whether through recycling programs or as litter, and as such, municipalities are an important stakeholder. Niagara Region looks forward to a coordinated effort with all levels of government. Any plastics strategy should also include the development and retention of recycling markets in Ontario.
Seek federal commitment to implement national standards that address recyclability and labelling for plastic products and packaging to reduce the cost of recycling in Ontario. (p 42)	Niagara Region is supportive of actions to reduce the cost of recycling, such as through implementation of national standards.
Ontario will establish an official day focused on cleanup of litter in Ontario, coordinated with schools, municipalities and businesses, to raise awareness about the impacts of waste in our neighbourhoods, in our waterways and in our green spaces. (p 42)	Niagara Region is supportive of this action and is undertaking an educational anti-litter campaign in 2019. The objectives of this campaign are to: (i) decrease the amount of litter in communities, specifically neighbourhoods, parks and other outdoor public spaces and; (ii) increase understanding and use of proper disposal methods for commonly littered items. Strategies include an education piece (targeted public space advertising, ads in newspaper and social media), provision of support to coordinated activities, and for Niagara

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	<p>Region to act as a hub for community clean ups so residents can participate.</p> <p>It would be beneficial for the Province to advertise and promote not only the official clean-up day, but also other local cleanup events, and to fund all or a portion of these clean-up events.</p>
<p>Work with municipal partners to take strong action against those who illegally dump waste or litter in our neighbourhoods, parks and coastal areas. (p 42)</p>	<p>Niagara Region is supportive of initiatives to reduce illegal dumping and is proactive in taking action against offenders. A reporting tool, accessible on-line or by phone, is available. A monetary reward (a shared cost between Niagara Region and the appropriate LAM) is provided to persons reporting illegal dumping when the report results in an act of compliance (i.e. the offender returns to the site and removes the dumped material) or in a conviction. In 2017 Niagara Region's Illegal Dumping Working Group (IDWG), reestablished in 2012 and comprised of Regional staff and LAM representatives, formalized a partnership with Crime Stoppers of Niagara (CSN) to aid in public awareness of initiatives and allow all parties to better utilize resources. Residents can use CSN's anonymous tipster system as an alternative option for reporting incidents of illegal dumping, and are still eligible for rewards related to compliance and conviction as outlined above. CSN also aids in the promotion of illegal dumping campaigns on their social media platforms. In 2018 the IDWG continued to focus on installation of illegal dumping signage at hot spots, continued to promote Niagara Region's illegal dumping campaign and reporting tool via multiple avenues including newspaper ads, banners, transit ads, brochures and social media, and provided public litter bin stickers tailored to each LAM, along with other actions.</p> <p>Niagara Region also works with local residents associations to help with concerns of illegal dumping and contamination. In 2018 Niagara Region completed a litter bin "blitz" in LAMs to reduce illegal</p>

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	<p>dumping in litter receptacles, an ongoing issue in Niagara Region.</p> <p>In 2018 a total of 755 illegal dumping reports were received at Niagara Region, an increase of 11% compared to 2017, and two offence notices were issued, along with 142 warning letters. Challenges for by-law officers include the need for evidence of the offender (e.g. material with the name and address of the offender) and the availability of a witness who is willing to testify in court. While bylaw officers have jurisdiction on public property, illegal dumping often occurs on private property.</p>

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Develop future conservation leaders through supporting programs that will actively clean up litter in Ontario's green spaces, including provincial parks, conservation areas and municipalities. (p 43)	<p>Niagara Region supports this action. One example is our Public Spaces Recycling (PSR) Program. To encourage installation of PSR containers in indoor and outdoor public spaces with higher public traffic, funding for the cost of containers is provided on a 50/50 cost-sharing basis between Niagara Region and LAMs.</p> <p>Niagara Region offers Special Events Recycling and Organics (SER&O) programs throughout the year to all public events within Niagara Region. A unique aspect of the program is the partnership with Eco-Defenders, a local non-profit community group that provides trained waste sorting volunteers to public events. Material diverted by Eco-Defenders is free of contamination and minimizes garbage produced by events, improving the diversion rates for Niagara Region's SER&O programming.</p> <p>As demonstrated by these examples, Niagara Region sees high value in the continued support of local programs promoting clean-up of litter and diversion of waste.</p> <p>All community events should be mandated to have diversion programs (twinned with garbage) and the Province should providing 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>

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Connect students with recognized organizations that encourage environmental stewardship so they could earn volunteer hours by cleaning up parks, planting trees, and participating in other conservation initiatives. (p 43)	Niagara Region has traditionally supported waste diversion programs in educational facilities and we continue to expand our programming.
Work with municipalities and producers to provide more consistency across the province regarding what can and cannot be accepted in the Blue Box program. (p 43)	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.
Explore additional opportunities to reduce and recycle waste in our businesses and institutions. (p 43)	<p>Niagara Region is supportive of initiatives that target waste reduction and diversion in the ICI sector. As noted earlier, 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 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>

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	Municipalities need to be compensated for ICI materials that are municipally collected as part of the integrated collection system.
Move Ontario's existing waste diversion programs to the producer responsibility model. This will provide relief for taxpayers and make producers of packaging and products more efficient by better connecting them with the markets that recycle what they produce. (p 43)	<p>Niagara Region is fully supportive of making producers responsible for properly managing the waste they produce, and believes the internalization of the cost of end-of-life product packaging with all-in pricing to remove costs from municipalities/taxpayers is the best option for Ontario. This provides the opportunity for design for the environment and less disposal.</p> <p>Niagara Region agrees with the Association of Municipalities of Ontario (AMO), who note that, "it is to the benefit of all stakeholders and citizens to have the Blue Box transition process start with the Minister of Environment, Conservation and Parks issuing a wind-up letter early in 2019, allowing for adequate time for robust planning and consultation on the development of a Paper Product and Packaging Regulation under Resource Recovery and Circular Economy Act, 2016 (RRCEA)".</p> <p>Furthermore, the list of designated materials should be reviewed and items such as construction and demolition waste included under producer responsibility.</p>
Investigate options to recover resources from waste, such as chemical recycling or thermal treatment, which have an important role – along with reduction, reuse and recycling – in ensuring that the valuable resources in waste do not end up in landfills. (p 43)	<p>Incentives to promote waste reduction (avoid waste generation) followed by reuse, recycling/composting are needed. These are higher value activities and although recovery is secondary, there should be recognition of energy production from biological treatment as diversion (e.g. anaerobic digestion to produce biogas or biological drying of organics into biofuel).</p> <p>Niagara Region is supportive of this and currently completes a formal yearly (at minimum) review of alternative waste management technologies. Niagara Region continues to engage other</p>

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	neighbouring municipalities in discussions related to available capacity at their current/future alternative waste management technology facilities and/or future needs that could be addressed by partnering with Niagara Region on alternative technologies.
Encourage increased recycling and new projects or technologies that recover the value of waste (such as hard to recycle materials). (p 43)	There is a desire for access to increased options for recycling unacceptable Blue Box items by residents. While Niagara Region supports the goal of increased recycling and development of new technologies, the approach to encourage improved environmental outcomes should also include mechanisms to discourage the use of difficult to recycle materials. With access to additional funding and Provincial support, innovative programs to increase municipal diversion rates could be more widely implemented.
Ensure new compostable packaging materials in Ontario are accepted by existing and emerging green bin programs across the province, by working with municipalities and private composting facilities to build a consensus around requirements for emerging compostable materials. (p 43)	Niagara Region is supportive of this action as municipalities currently face challenges with respect to compostable packaging, namely that the material does not all break down in the various organic processing systems, at the same rate. Consensus around requirements would ensure the effectiveness of producer P&E material and also reduce resident confusion. Requirements would also help ensure that producers do not move to compostable packaging simply to avoid producer responsibility for designated paper and packaging, thereby shifting the problem. At the same time, the requirement to accommodate standard compostable material may mean that some municipalities must invest in new technology. Cost and capacity is a concern as increased tonnages will result in increased processing contract costs. Municipalities must be supported in these efforts.
Consider making producers responsible for the end of life management of their products and packaging. (p 43)	This aligns with previous positions put forward by Niagara Region. Niagara Region requests the Province take a firm stance, for example, designating all packaging, whether it is recycling or compostable. Producers should pay for

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	<p>management of designated materials regardless of the stream in which they end up.</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>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>Cut regulatory red tape and modernize environmental approvals to support sustainable end markets for waste and new waste processing infrastructure. (p 44)</p>	<p>Access to stable and sustainable end markets for processed materials are critical to the successful implementation of the Province's plan. This includes the development and implementation of local / domestic end markets.</p> <p>As previously noted, increased organics tonnages due to an organics ban and increased P&E, requires that municipalities have the capacity to process and manage the material. The process could be eased with modernized environmental approval processes. With respect to Blue Box materials, market prices have fluctuated in recent years and access to the world-wide market requires production of a consistent and un-contaminated product. Funding and improved access to new waste processing infrastructure might allow for better sorting and processing of material, resulting in an improved and more desirable product for end-markets along with increased diversion.</p> <p>Niagara Region is supportive of streamlining approvals for waste processing infrastructure.</p>

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Provide municipalities and the communities they represent with a say in landfill siting approvals....The province will look for opportunities to enhance municipal say while continuing to ensure that proposals for new and expanded landfills are subject to rigorous assessment processes and strict requirements for design, operation, closure, post-closure care and financial assurance. (page 44)	Niagara Region is supportive of streamlining landfill site approvals.
Set clear rules to allow industry to reduce constructions costs, limit soil being sent to landfill and lower greenhouse gas emissions from trucking by supporting beneficial reuses of safe soils. (p 45)	Niagara Region agrees that excess soil from construction projects should be beneficially re-used wherever possible. Landfill sites should not be the first option for soils disposal, as landfill capacity is required for solid waste disposal. Niagara Region agrees that beneficial soil re-use sites should be identified locally to reduce trucking distances, whereby reducing cost and reducing greenhouse gas emissions. Previous modification to the MECP Excess Soil Disposal Framework included practical options for municipalities to apply with respect to soil reuse. For example, municipalities can reuse salt contaminated soils at other locations that have similar salt impact using local background soil quality as a benchmark, rather than immediately resorting to landfilling if the soil exceeds the MECP Ontario background concentrations. The valuable input and ideas provided in previous EBR consultations should be incorporated in future plans.
Work with municipalities, conservation authorities, other law enforcement agencies and stakeholders to increase	As previously noted, Niagara Region by-law officers do not have jurisdiction over illegal dumping on private lands, and illegal soil dumping on public land in Niagara Region is not a common practice. (Some

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enforcement on illegal dumping of excess soil. (p 45)	<p>of the Local Area Municipalities in Niagara have site-alteration by-laws to regulate illegal dumping of fill.) Clarification regarding who is responsible for monitoring of excess soil movement should be provided. Contamination is based on soil chemistry and as such, visual inspection is not sufficient. Currently our by-law officers focus on the illegal dumping of waste material and monitoring/enforcement of illegal soil dumping is difficult due to the nature of the material as it is typically lacking supporting documentation required for conviction.</p> <p>A provincial framework for development of Excess Soil Management Plans (ESMP) developed in consultation with stakeholders, would help ensure consistency across Ontario municipalities.</p>
Consider approaches for the management and spreading of hauled sewage to better protect human health and the environment (including land and waterways) from the impacts of nutrients and pathogens. (p 45)	<p>In Niagara, all sewage is hauled to municipally owned wastewater treatment plant for disposal and treatment. No spreading of raw sewage occurs on agricultural land here. Niagara Region has implemented a successful sewage biosolids management program that works well and is welcomed and supported by the local agricultural industry. The nutrient rich biosolids, from anaerobically digested sewage are land applied to give the soils the required nutrients needed to make local crops thrive. This program has worked effectively for several decades and Niagara would want to have input if any changes are being contemplated that may impact our contractual obligations or the agricultural community in general.</p>

Waste Management Comments on Next Steps in Environmental Plan

Next Steps	
Continue to consult with the public and engage with Indigenous communities. (p 52)	Niagara Region is supportive of continued public engagement. Programs are most effective when all stakeholders are engaged in defining and developing opportunities, leading to better uptake and support. Waste Management Services (WMS) actively engages with all levels of stakeholders, including citizens, with respect to waste management policies and programs. As part of the Niagara Region's Humberstone Landfill Site Expansion EA process, dedicated meetings with Indigenous communities including Six Nations and Niagara Region Metis Council occurred. An EA Advisory Group comprised of local residents and businesses was also established. These efforts helped develop trust with the neighbouring community and Aboriginal Groups resulting in successful EA.
Begin implementing priority initiatives. (p 53)	Stakeholders need information about short and long-term timelines and access to detailed implementation plans in order to best support the Province with implementation of priority initiatives.

Next Steps	
Measure and report on progress. (p 53)	Creation of data collection mechanisms to measure progress in waste reduction and resource recovery is vital. The province should have separate targets and metrics for reporting progress in reducing waste in the disparate sectors (LDR, ICI and multi-res sectors) and these targets should be enforced. Targets and metrics should be developed in partnership with all stakeholders, including municipalities.