

## **ACE's comments on the Environmental Screening Process for Landfill Service Area Changes;**

ACE supports the efforts of the City to continue to promote and develop the area of Resource Recovery. The proposal for a new Waste Resource Innovation Centre is a promising step forward. ACE also credits the City for quality waste management procedures and the consistent respect for local public consultation.

The Environmental screening process for changes to the Landfill service area proposes the addition of five customers from outside City boundaries.

ACE respects the need for financial support to fund waste management processes, particularly when previous customers have been discontinued. ACE also recognizes the advantage of a cooperative partnership with two water treatment facilities that provide services to London consumers.

ACE has some concerns with the following:

The proposal is moving in the direction of an increase in waste to landfill rather than reducing and diverting waste. In addition, the proposal will decrease the life of W12A by one year rather than extending the landfill life span.

ACE questions whether the change in boundaries to allow waste customers outside of London could open the gates to encourage more non London clients in the future.

ACE is concerned changes in boundaries could encourage the City to use sources of revenue outside of London to maintain a certain level of landfill use based on cost efficiency.

It would be useful to have a financial accounting of revenue generated to determine the extent to which this undertaking is in the public interest.

ACE recommends:

The City offset the additional waste to landfill by introducing a new waste diversion project such as the Green Bin program. ACE was informed that a Green Bin program could add one year to the life of W12A.

The City take advantage of a portion of waste revenue received from the new customers towards developing an additional waste diversion system such as the Green Bin program for London residents.