

Waste Management Community Liaison Committee Agenda



Meeting #2 Wednesday September 13, 2017

5:00 pm – Meet at City Hall if you want to carpool (City will have a van)

5:30 pm - Food, mingle/network time

6:00 pm – Tours 7:20 pm – Meeting 8:00 pm - Adjournment

Location: Manning Drive Regional Material Recovery Facility, 2nd Floor, 3438 Manning Drive

Previous Meeting June 5, 2017

Item #	Item	Approx. Amount of Time (min.)	Attach.
1	Facility Tours	80	
а	W12A Landfill	40	
b	Material Recovery Facility (including video)	40	
2	CALL TO ORDER	5	
а	Review of Agenda	2	
b	Items that Must be Added to this Agenda	2	
С	Approval of notes from June 5, 2017 meeting	1	
3	STANDING ITEMS	30	

Discussion on standing items related to "updates and next steps" has been delayed until the next meeting (proposed for Late October/early November) to allow additional time for the tours. Information on updates and next steps can be found in on-line reports listed below. The information in these reports will be discussed at the next meeting.

- www.london.ca/city-hall/meetings/Pages/default.aspx
 See July 17, 2017 meeting of the Civic Works Committee Report at this meeting:
 - Appointment of Consulting Engineer for Various Technical Studies as Part of the Environmental Assessment Process for the Proposed Expansion of the W12A Landfill Site

- www.london.ca/city-hall/meetings-advisory/Pages/default.aspx
 See June 27, 2017 meeting of the Waste Management Working Group Reports at this meeting:
 - Background Report #2: Reporting Categories and Titles
 - Update Report #2: Programs, Projects And Provincial Activities that will Inform and/or Influence Strategies
 - Update Report #3 Project Timelines
 - Progress Report #1: Community Engagement Program
 - Progress Report #2: Partial Municipal Responses to Regional Service Area for Waste Management Facilities (March 30 To June 2, 2017)

а	Updates Resource Recovery Strategy (Between June 5 and July 19, 2017)	0			
b	Next Steps – Resource Recovery Strategy	0			
С	Updates – Residual Waste Disposal Strategy – EA for a Proposed Landfill Expansion (Between June 5 and July 19, 2017)	0			
d	Next Steps – Residual Waste Disposal Strategy – EA for a Proposed Landfill Expansion	0			
е	CLC Discussion – Actions and Feedback. Topics for September 13, 2017 to include (but not limited to):	30			
	Key Project Parameters				
	 25 years (attachment A) 				
	 Limits on waste quantities (attachment B) 				
	 Use by neighbouring municipalities (attachment C) 				
	 60% diversion by 2022 (attachment D) 				
	Community Engagement on Resource Recovery				
4	ADDITIONAL BUSINESS	5			
а	Key items for next meeting	3			
b	Date of next meeting	2			

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Attachment A What Length of Time does the Disposal Strategy Cover?

Overview

The W12A Landfill has approximately eight years capacity remaining based on current waste disposal rates which will provide disposal capacity until 2025. The five most recent municipal Terms of References (ToRs) (which sets out the framework for undertaking the EA) approved by the MOECC (Table 1) for landfill expansion EA's have planning periods for new residuals disposal capacity of 20 to 36 years beyond the currently approved disposal capacity.

Considering the above, new residuals disposal capacity of 20 years, 25 years, 30 years and 35 years were assessed taking into consideration:

- consistency with other EAs;
- Final Draft Strategy for a Waste-Free Ontario;
- MOECC comments;
- understanding of community considerations; and
- financial considerations.

Consistency with other EAs

Precedents set by other residual management disposal capacity projects provide a good indication of expectations by government and community reviewers. As noted above the five most recent municipal ToRs for landfill expansions approved by the MOECC are identified on Table A-1.

Table A-1 – Planning Periods of Recently Approved ToRs

Municipality	Existing Landfill Remaining Site Life (years)	New Residuals Management Disposal Planning Period (years)
City of Temiskaming Shores (2012)	7	23
Regional Municipality of Niagara (2013)	3	25
The Town of St. Marys (2014)	4	36
Municipality of Greenstone (2014)	0	20 to 30
County of Brant (2014)	10	30
Average	5	27 to 29
City of London	8	-

Final Draft Strategy for a Waste Free Ontario

The MOECC posted its Final Draft Strategy for a Waste-Free Ontario: Building the Circular Economy to the Environmental Registry on December 16, 2016 and will receive comments until January 30, 2017. Although not finalized, the proposed strategy for a Waste-Free Ontario does provide a general guideline for where the Province is likely to head with respect to future landfills. The strategy recognizes the need for more landfill space but does not want an oversupply of landfill capacity. The proposed strategy states:

"While Ontario strives for a waste-free future, there will still be a need for landfill space as we work towards this goal... Potential new landfills will need to be planned well to avoid over-supply of landfill capacity, and managed well to meet environmental standards and maximize the capture of greenhouse gases."

Seeking an additional 20 to 25 years of waste disposal capacity is reasonable when considering the above. It balances the need for long-term waste disposal security against looking too far into the future given the proposed strategy for a Waste-Free Ontario. The 20 to 25 years of additional waste disposal capacity is less than the average additional disposal capacity being sought by other municipalities who recently had ToRs approved (Table 1).

It must be noted that landfilling is different when compared with other waste disposal technologies such as energy-from-waste (EFW). A landfill is built in stages (i.e., cells for waste placement) that typically last 3 to 5 years. The cost to build the cell occurs when the previous cell is nearing completion (about one year before). If there is less garbage than anticipated the construction of the next stage can be delayed. This is different than an EFW facility that must be built in its entirety and requires a minimum tonnage commitment to operate the facility. Some EFW technologies can be modular in size to help lower capital costs if available tonnage is likely to be lower.

MOECC Comments

In discussions with the MOECC it was made clear that the decision on the length of the new disposal capacity period was up to the City but the MOECC would need a compelling rationale to support additional disposal capacity of greater than 25 years given the Draft Final Strategy for a Waste-Free-Ontario: Building the Circular Economy.

Understanding of Community Considerations

Generally, a shorter disposal capacity period of time (20 years) would be considered better by the local community living near a current or proposed disposal facility noting that some/many in the local community have no desire for any additional capacity at the W12A Landfill. The community as a whole would likely prefer a longer disposal capacity period (25 to 30 years) to provide a longer term solution.

Financial Considerations

The environmental assessment process for approval of long term residuals disposal facilities is long and expensive. The length of the overall approvals process for municipalities is typically between six and eight years and costs several millions of dollars. A longer, new disposal capacity period allows the work by everyone and costs of the EA process and other required subsequent approvals to be spread over a longer period of time and delays the expense of completing the next EA.

Recommendation

Table A-2 summarizes the considerations discussed above with respect to the length of the new residuals disposal planning period.

Table A-2 – New Disposal Planning Periods (Considerations and Length of Time)

Considerations	New Disposal Planning Periods (years)			
	20	25	30	35
Consistent with Other EAs	✓	✓	✓	✓
Consistent with Waste-Free Strategy	✓	✓	×	×
MOECC Comments	✓	✓	×	×
Understanding of Community Considerations	✓	×	×	×
Financial Considerations	×	✓	√	✓

A new disposal planning period of 30 or 35 years is not recommended as they are not consistent with the Province's recently released Draft Final Strategy for a Waste-Free Ontario or comments provided by the MOECC.

New disposal capacity planning periods of 20 or 25 years have similar benefits but a period of 25 years provides greater certainty for London and delays the expense of completing the next environmental assessment for a longer period. For these reasons, it is proposed that the new disposal capacity period of 25 years beyond the current capacity of the W12A Landfill be pursued, extending to 2050.

Attachment B What annual tonnage could be landfilled?

The current Environmental Compliance Approval (ECA) for the W12A Landfill site limits the maximum annual disposal (referred to as the "rate of fill") to approximately 650,000 tonnes. Historical annual quantities disposed of have been a function of waste diversion programs, use of an EFW facility operated by the London Health Sciences Centre, disposal bans (e.g., construction, renovation and demolition materials) and amount of business garbage delivered to the W12A Landfill. Listed in Table 3 is a summary of tonnage over the years.

Table 3 - Waste Quantities Received at the W12A Landfill

Tonnes	Description of Activity	
260,000	Waste received in 2016	
225,000	Average annual waste received for disposal for 5 year period 2012 - 2016	
260,000	Average annual waste received for disposal for 5 year period 2007 - 20011	
275,000	Highest 5 year average annual waste received for disposal 1984 - 1988	
310,000	10,000 1987 - the largest annual amount of waste (garbage) received	
380,000	1989 - the largest annual amount of waste (garbage and clean fill) received	

The average annual amount of waste received for disposal at the W12A Landfill over the last 10 years has been approximately 240,000 tonnes. The largest annual amount of waste received for disposal occurred in 1987 and was approximately 310,000 tonnes.

Preliminary waste quantity projections indicate that the maximum annual rate of fill of 650,000 tonnes will not have to be increased to meet the disposal needs envisioned considering the 25 year time period recommended above, the proposed service area (Section 3) and the future waste diversion goals (Section 4). It may be possible (or necessary from an approvals perspective to "avoid over-supply of landfill capacity) to reduce the annual rate of fill once final waste quantity projections have been calculated.

Considering the above, it is proposed not to change the maximum annual rate of fill of 650,000 tonnes per year at this time but is expected that the annual rate of fill will be reduced once the final waste quantity projections have been finalized.

Attachment C What Service Area does the Disposal Strategy Include?

Overview

The approved W12A Landfill service area currently includes London, Thames Centre, Try Recycling's facilities located in Middlesex Centre (County of Middlesex), the Lake Huron Water Treatment Plant located in the Municipality of South Huron (County of Huron) and the Elgin Area Water Treatment Plant located in the Municipality of Central Elgin (County of Elgin) for disposal; and London, County of Middlesex and County of Elgin for Municipal Hazardous and Special Waste Services (MHSW) (See Map 1, next page).

The City could limit this aspect of the EA to the existing service area of the W12A Landfill (as noted above, a combination of locations and point sources) or consider a larger service area (regional to provincial). Factors to take into consideration when deciding on the extent of the service area include:

- consistency with current approach for providing waste management services;
- geographic location (wasteshed);
- province's recently released Final Draft Strategy for a Waste Free Ontario;
- provincial shortfall in disposal capacity;
- provision of a publically-owned disposal option for nearby municipalities, institutions & businesses;
- community support;
- local nuisance impacts;
- financial benefit;
- backup/contingency disposal capacity; and,
- ease of approvals.

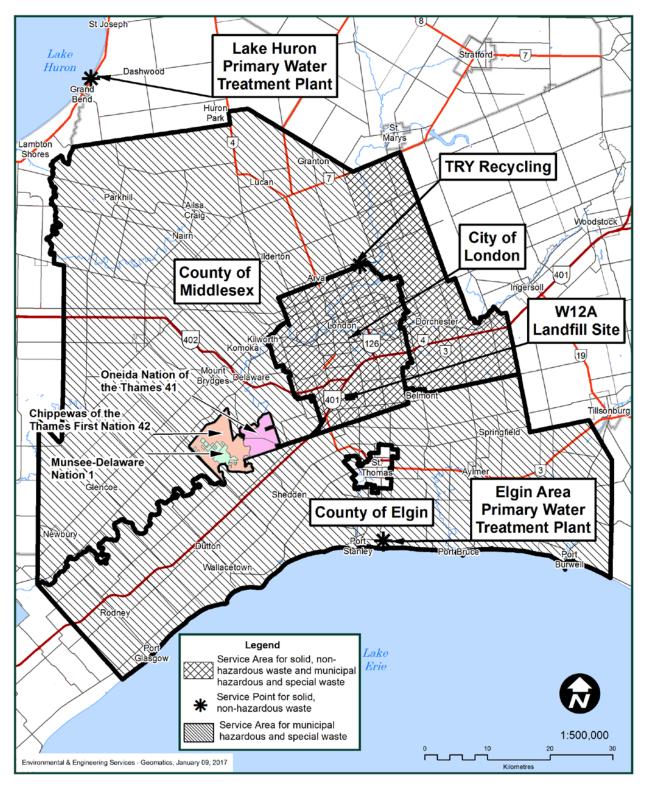
Consistent with Current Approach for Waste Management Services

Not changing the existing service area or having a regional service area is consistent with the current approach of providing waste management services to nearby municipalities when in the interest of the City. Municipalities, other government organizations, or individual businesses in Eglin, Middlesex, Huron and Oxford Counties already use one or more of the waste management services available in the City's Waste Management Resource Recovery area as shown in Table C-1. The City also provides waste management services to the Oneida First Nations community.

Table C-1 - Waste Management Services Provided to Other Jurisdictions

Waste Management Service	First Nations	Elgin	Huron	Middle- sex	Oxford
Disposal of Municipally Controlled Waste	-	-	-	Yes	-
Disposal of Point Source IC&I Waste	-	Yes	Yes	Yes	-
Processing of Municipally Controlled Recyclables	-	Yes	-	Yes	-
Processing of IC&I Recyclables	-	Yes	-	Yes	Yes
MHSW	Yes	-	-	Yes	-

Map 1 – Current Services Areas (Solid, Non-Hazardous Waste and Municipal Hazardous and Special Waste)



It is also noted that the City's Manning Drive Material Recovery Facility (MRF) can accept recyclables from anywhere in Ontario but currently only processes recyclables from the local region (recyclables from nearby municipalities or organizations in Elgin, Middlesex and Oxford Counties).

The City also is the Administrator in the Lake Huron and Eglin Area Water Supply Systems which is a regional water supplier to municipalities in Elgin, Huron, Lambton and Middlesex Counties.

Geographic Location

A regional service area consisting of Elgin County, Middlesex County, Huron County Lambton County, Oxford County and Perth County makes a logical "wasteshed" consisting of all Counties that border Middlesex County. London represents the main regional center for all or parts of each these Counties. This proposed "wasteshed" or service area is shown on Map 2 (next page).

The existing service area has served a very useful purpose but it has created several restrictions that impede service efficiencies by creating unnecessary boundaries and removing control from London Municipal Council to assist neighbouring municipalities and/or derive additional tipping fee revenues from their waste management assets. A province-wide service area is a more common request from private landfill operators. It is also significantly more complex when analyzing impacts and other considerations (e.g., environmental, social, financial).

Recently Released Final Draft Strategy for a Waste-Free Ontario

As previously noted, the MOECC posted its Final Draft Strategy for a Waste-Free Ontario: Building the Circular Economy to the Environmental Registry. The strategy recognizes the need for fewer and larger landfills to reduce environmental impacts, particularly those associated with greenhouse gas impacts. This will require a more regional approach to waste disposal. The proposed strategy states:

"The size of landfills will also be considered to reduce the need for multiple new landfills and use landfill gas reduction facilities effectively."

Having London provide residual waste services to a larger area (regional to provincial) is consistent with having fewer and larger facilities to reduce greenhouse gas impacts.

Addresses a Portion of Provincial Shortfall in Disposal Capacity

The Ontario Waste Management Association estimates that Ontario's existing landfill capacity is estimated to be between 11 years (if all waste generated in Ontario was disposed in Ontario) to 17 years (if 30% of Ontario's waste continues to be sent to the United States for disposal). Consequently, there is the potential for a significant shortfall in disposal capacity should new disposal capacity not become available in a timely fashion.

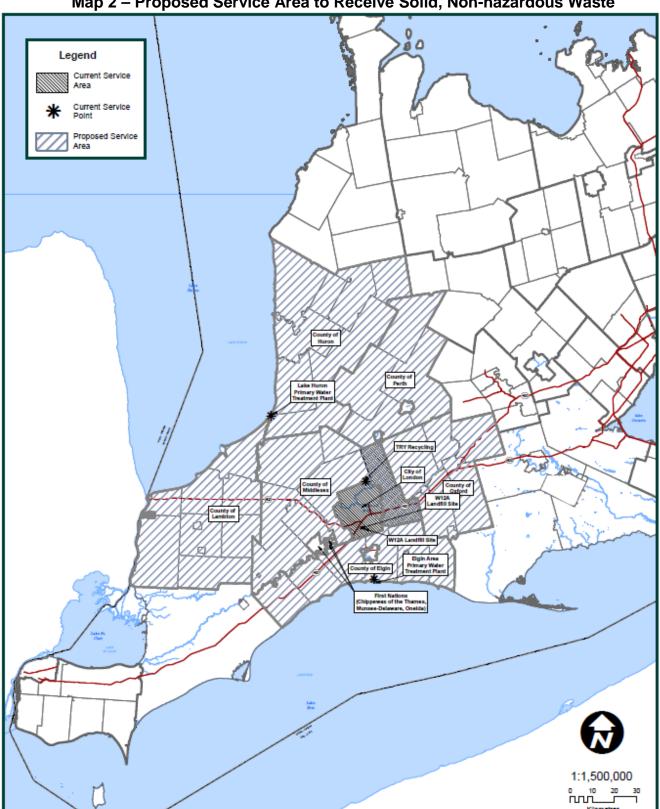
There are currently two large landfill proposals in Southwestern Ontario; a new landfill is proposed near Ingersoll (Southwestern Landfill Proposal by Walker Environmental) and expansion of the Ridge Landfill in Chatham-Kent (proposed by Progressive Waste Solutions). It is estimated there will still be a waste disposal capacity shortfall over the proposed study period even if both these landfill proposals are approved.

Having a regional to provincial service area could address a portion of the provincial disposal capacity shortfall.

<u>Publically-owned Disposal Option for Nearby Municipalities, Institutions and Businesses</u>

Municipalities that do not have their own landfill typically must rely on using a private landfill for disposal, of which there are a limited number in Southern Ontario. Enabling the W12A Landfill to

accept waste from surrounding municipalities would provide these municipalities with a competitive public option that could potentially reduce their costs. It also has the potential to reduce greenhouse gas emissions by reducing transportation distances.



Map 2 - Proposed Service Area to Receive Solid, Non-hazardous Waste

It is common for institutions and businesses to award waste collection and disposal contracts for all of their facilities irrespective of the municipalities in which they are located in. This can provide cost savings through economies of scale and/or simplify their administrative costs associated with waste management. For example, the Thames Valley District School Board which has schools in the cities of London, Woodstock and St. Thomas as well as the counties of Elgin, Middlesex and Oxford. Having a landfill site that can serve all these areas would be beneficial.

Community Support

No community engagement on choosing between the existing, a regional or a provincial service area has been undertaken. Based on previous events, it is believed:

- there would be no to some opposition to the existing service area;
- there would be significant opposition to a provincial service area regardless of the benefits based on the opposition to the purchase of the Green Lane landfill by the City of Toronto; and,
- there may or may not be opposition to a regional service area given the limited concerns with the changes made to the W12A Landfill's service area over the last few years.

Local Nuisance Impacts

One of the proposed guiding principles (separate Waste Management Working Group Report) to be used to direct the development of the long-term Resource Recovery Strategy and the Residual Waste Disposal Strategy for the City of London is:

Waste disposal facilities must meet, and if possible, exceed all applicable regulatory standards. London will make all reasonable efforts to reduce and address negative effects of any future residual waste disposal facility through proper design and operation of the facility, as well as providing appropriate mitigation measures to the surrounding community.

In other words, regardless of the size of the service area (existing, regional or provincial), any waste disposal facility will need to meet all applicable regulatory standards and will be designed and operated to prevent adverse impacts to the area's water quality, air quality, noise levels, etc.

The size of the service area does have the potential to affect nuisance impacts (e.g., odours, increase traffic on the roads, etc.) in the local area.

Provide Financial Benefit to the City by Lowering Waste Disposal Costs

Waste disposal facilities typically have significant "economies of scale" due to the large portion of fixed costs (e.g., landfills have fixed costs such as scale house attendant, operations staff, groundwater monitoring, etc.) compared to the variable costs (e.g., leachate collection system, cover material, etc.). Consequently having more waste come to a waste disposal facility over a year from a regional to provincial service area will lower the cost per tonne of waste received. This results in more economical and cost effective waste disposal for the City and the customer base.

The additional revenue and financial savings can then be reinvested into new environmental initiatives at the landfill, used to lower waste management costs for the residents and/or offset the cost of additional resource recovery (i.e., tipping fee charge of approximately \$45/tonne

versus an incremental operating and capital replacement cost of \$25/tonne for 150,000 tonnes per year will generate \$3,000,000 annually to lower costs or to reinvest).

Provide Backup/Contingency Disposal Capacity

Waste management is a critical service and any prolonged disturbance or disruption of service can be detrimental to both the environment and residents and other users. There may be circumstances where the City will not be able to accommodate some or all the waste coming to the landfill for a short period of time. This could be the result of a work stoppage, fire, accidents or malfunctions at the landfill, etc. In such cases, having disposal options at other landfills as a short-term contingency measure is vital to providing effective waste management.

Ideally the City would have a contingency plan in place whereby one or more landfills would be able to take London's garbage in these circumstances and in return the City would reciprocate the contingency (backup) capacity for these landfills. Having a service area that is broader than the current service area would allow the City to create a contingency agreement with any other landfills in the selected service area.

Ease of Approvals

It is expected that proposing a provincial-wide service area for a municipally-owned waste facility will make the environmental assessment approval more difficult as it would complicate the assessment of impacts. For example, it would be difficult to determine greenhouse gas (GHG) impacts from the transportation of waste given the wide range from where waste could originate. A service area using the existing service area of the W12A Landfill or a regional Study Area would be much less complicated.

Recommendation

Table C-2 summaries the considerations discussed above with respect to the proposed service area.

Table C-2 – Service Areas and Considerations

Considerations	Service Areas			
	Existing	Regional	Provincial	
Consistency with Current Approach	✓	✓	×	
Geographic Location (waste shed)	×	✓	×	
Final Draft Strategy for a Waste-Free Ontario	×	✓	✓	
Provincial Shortfall in Disposal Capacity	×	✓	✓	
Provision of a Publically-owned Disposal Option	×	✓	✓	
Community Support	√?	√?	×	
Local Nuisance Impacts	\checkmark	×	×	
Financial Benefit	×	✓	✓	
Backup/Contingency Disposal Capacity	×	√	√	
Ease of Approvals	√	√	×	

Based on the above considerations:

- A province-wide service area is not recommended given the expected additional difficulties in the approval process and strong likelihood of public opposition.
- A regional service area is preferred over a service area using the existing service area of the W12A Landfill because it has most of the benefits of the existing service area plus the added benefits of being consistent with the Final Draft Strategy for Waste-Free Ontario, addresses a portion of the provincial shortfall in disposal capacity, provides a public disposal option for nearby organizations and municipalities and provides a greater financial benefit to the City.

It is proposed the Disposal Strategy include the City of London plus Elgin County, Middlesex County, Huron County, Lambton County, Oxford County, Perth County and local First Nation Communities in its proposed service area. The population of Elgin, Middlesex, Huron, Lambton, Perth and Oxford Counties (including separated cities) as well as local First Nations communities is approximately 525,000.

It must be noted that having available residual waste disposal capacity for municipalities outside of London does not mean that London is obligated to accept waste from these municipalities in the future. City Council will the authority to determine which, if any, municipalities or businesses outside of London are allowed to use any City residual waste disposal facilities. For example, the City's Manning Drive Material Recovery Facility (MRF) can accept recyclables from anywhere in Ontario. It is currently processes recyclables from municipalities or organizations in Elgin, Middlesex and Oxford Counties.

In February, City staff were directed to to canvass municipalities responsible for waste management within the proposed service area to determine interest in using any future waste disposal or future resource recovery facility.

Attachment D

What Residential Waste Diversion Rate should we use in sizing the landfill?

Provincial Diversion Goals

The Province recently established two "visionary goals" for solid waste which were to achieve zero waste and zero greenhouse gas emissions. The Province also established interim goals for total solid waste diversion (consisting of residential; institutional, commercial and industrial (IC&I); and construction, renovation and demolition (CR&D) waste streams) of 30% by 2020, 50% by 2030 and 80% by 2050. The Provincial waste diversion goals are aggressive (aspirational) targets and to achieve them will require major changes to how business is done in Ontario including moving to a Circular Economy.

The existing goals as well as the previous waste diversion goals set by the Province are presented in Table 1.

Year	Diversion Goal/Rate	Comment	
1989 ¹	25% by 199250% by 2000	goal applied to all waste	
2004 ²	• 60% by 2009	goal applied to residential, IC&I and CR&D sectors individually	
2015 ³	• 25% (actual)	Overall rate	
20174	30% by 202250% by 203080% by 2050	goal applied to all sectors combined Energy from waste and alternative fuels are permitted but these methods do not count towards diversion	

Table 1 - Provincial Waste Diversion Goals and Actual Rate

Notes

- 1. A Brief History of Waste Diversion in Ontario (Canadian Institute for Environmental Law and Policy, 2008)
- 2. Ontario's 60% Waste Diversion Goal A Discussion Paper (MOE, 2004)
- Draft Strategy for a Waste Free Ontario: Building: The Circular Economy (MOECC, 2015)
- 4. Strategy for a Waste Free Ontario Building a Circular Economy (MOECC, 2017)

Data from the Province indicates that the current diversion rate is approximately 45% to 50% for residential waste and about 25% for all waste (residential, IC&I and CR&D combined). According to *Draft Strategy for a Waste Free Ontario: Building: The Circular Economy* (MOECC, 2015) "Ontario's waste diversion rate has stalled at 25 percent over the last decade". This means the province has not come close to meeting any of the previous targets except for the 25% waste diversion (by 1989) but it took over two decades longer that proposed.

Residential Waste Diversion

The City has progressively carried out assessments of waste diversion and developed implementation programs and schedules for specific activities to continue to increase its rate of diversion. The current residential diversion rate is 45% with the latest assessment of diversion

programs provided in *The Road to Increased Resource Recovery and Zero Waste (Road Map 2.0, 2013).*

Programs identified in Road Map 2.0 have the potential to divert 60% of residential waste. The only remaining major diversion component that remains undecided from Road Map 2.0 is how residential organics will be managed. It is estimated that it would take between two and five years to fully implement an organics management program depending on the method and technology chosen to manage organics.

A review of the larger municipalities/recycling boards in Ontario (excluding London) indicates that 60% residential diversion is a practical upper limit for large municipalities with a Green Bin program (see Appendix B). Nine of the ten largest municipalities (i.e., Essex-Windsor does not have a Green Bin program) had Green Bin programs and their diversion rates for 2014 and 2015

are presented in Table 2. Data for 2016 will not be available until spring 2018.

The City of Guelph is also included in the table as a comparator city as they have a University (like London) and a Green Bin program.

Diversion rates varied from 43% to 63% with an average diversion rate of 53%. Only three jurisdictions (Guelph, Halton and York) achieved a diversion rate greater than 55%. Without a Green Bin program, the practical upper limit for residential diversion for a large municipality is approximately 50%.

As shown in Table 2 there was no increase in waste diversion from 2014 to 2015. In general, increases in composting were offset by decreases in recycling (e.g. fewer newspapers, steel cans, etc.).

Some municipalities have set aggressive (aspirational) waste diversion targets higher than 60% but do not have a clear strategy or specific plan on how they will reach these targets. It is likely residential diversion rates will increase beyond 60% in the future but will require the use of technologies that are currently not practical or economically justified.

Table 2 - Waste Diversion in Municipalities with Green Bin Programs

Municipality	Waste Diversion ¹		
	2014	2015	
Ottawa	45%	43%	
Peel	45%	44%	
Hamilton	48%	46%	
Toronto	52%	52%	
Durham	55%	54%	
Niagara	52%	54%	
Waterloo	52%	54%	
Halton	56%	57%	
Guelph	-	61%	
York	62%	63%	
Avorago	52%	52% ²	
Average		53%	

Notes

- 1. From www.RPRA,ca/Library/WDO-Historical/Municipal-Information
- 2. Average excluding Guelph.

It should be noted that multi-residential units have much lower diversion rates compared to single family homes. In London the average diversion rate for single family homes is 50% compared to 20% for multi-residential units. London has a higher percentage of multi-residential units (i.e., apartments buildings) compared to many other large municipalities. Approximately one in three housing units in London is multi-residential. The percentage of multi-residential units is expected to increase in the future due to intensification (as per The London Plan) which will make it more difficult to increase diversion.

The City is considering establishing a goal to increase the current London household waste diversion rate to 60% by 2022 from the current rate of 45% and take into account recently announced interim provincial waste diversion targets of 30% by 2022, 50% by 2030 and 80% by 2050.

It is proposed Residual Waste quantities that the City will need to manage will be estimated by assuming that the current London household waste diversion rate of 45% will increase to 60% by 2022. It is possible that further increases in residential waste diversion may occur after 2022 but for planning purposes higher diversion rates cannot be relied on at this time.