

<b>TO:</b>	<b>CHAIR AND MEMBERS CIVIC WORKS COMMITTEE MEETING ON JANUARY 9, 2018</b>
<b>FROM:</b>	<b>KELLY SCHERR, P.ENG., MBA, FEC MANAGING DIRECTOR, ENVIRONMENTAL &amp; ENGINEERING SERVICES AND CITY ENGINEER</b>
<b>SUBJECT</b>	<b>COMMENTS ON ENVIRONMENTAL BILL OF RIGHTS REGISTRY - PROPOSED FOOD AND ORGANIC WASTE FRAMEWORK</b>

### RECOMMENDATION

That, on the recommendation of the Managing Director, Environmental & Engineering Services and City Engineer, with the support of the Director, Environment, Fleet and Solid Waste, the following discussion (Section 1) and comments (Section 2) **BE ENDORSED AND SUBMITTED** to the Ministry of Environment & Climate Change's Environmental Bill of Rights Registry posting (EBR 013-1814) Proposed Food and Organic Waste Framework.

### PREVIOUS REPORTS PERTINENT TO THIS MATTER

Some relevant reports that can be found at [www.london.ca](http://www.london.ca) under City Hall (Meetings) include:

- Comments on Environmental Bill of Rights Registry – Discussion Paper: Addressing Food and Organic Waste in Ontario (July 17, 2017 meeting of the Civic Works Committee – (CWC), Item #12)
- Comments on Environmental Bill of Rights Registry – Final Draft Strategy for a Waste Free Ontario - Building the Circular Economy (January 10, 2017 meeting of the CWC, Item #15)
- Comments on Environmental Bill of Rights Registry - Proposed Waste Free Ontario Act and Draft Strategy for a Waste Free Ontario - Building the Circular Economy (February 2, 2016 meeting of the CWC, Item #14)

### STRATEGIC PLAN 2015-2019

The following report supports the Strategic Plan in the areas of waste diversion, waste management planning, financing, climate change mitigation and adaptation, and job creation. Specifically, the potential changes to waste management locally and provincially address three of the four Areas of Focus from the Strategic Plan:

#### **Building a Sustainable City**

- Strong and healthy environment
- Robust infrastructure

#### **Growing our Economy**

- Local, regional, and global innovation
- Strategic, collaborative partnerships

#### **Leading in Public Service**

- Proactive financial management
- Innovative & supportive organizational practices
- Collaborative, engaged leadership
- Excellent service delivery

### BACKGROUND

#### **PURPOSE**

The purpose of this report is to provide Committee and Council with:

- A summary of the Ministry of Environment & Climate Change (MOECC) Proposed Food and Organic Waste Framework (Framework) including the potential impacts to London (including residents and businesses); and

- The City of London's comments on the Framework for approval and forwarding to the Environmental Bill of Rights (EBR) Registry no later than January 15, 2018.

## CONTEXT

The MOECC published the final Strategy for a Waste-Free Ontario: Building the Circular Economy in February 2017, a requirement of the *Waste Free Ontario Act, 2016*, (WFOA), which outlines a road map for resource recovery and waste reduction for Ontario. It also:

- sets a vision and goals including interim waste diversion goals for 2020 (30%), 2030 (50%) and 2050 (80%);
- articulates key government actions to support implementation of the vision and goals; and
- identifies performance measures to be used to assess progress towards achieving the vision and goals.

The Strategy focuses on moving Ontario towards a circular economy described as “a system where nothing is wasted and valuable materials destined for landfill are put back into the economy without negative effects on the environment.” This approach – a circular economy – has the potential to reduce greenhouse gas emissions, save and better utilize scarce resources, as well as create jobs and financial opportunities.

The Strategy commits the MOECC to develop a Food and Organic Waste Action Plan. The Strategy also proposes that the first policy statement under the *Resource Recovery and Circular Economy Act, 2016* will focus on food and organic waste. In May 2017 the Discussion Paper: Addressing Food and Organic Waste was posted on the EBR registry. London submitted comments (presented at the July 17, 2017 CWC meeting). The discussion paper served as the basis for preliminary discussions with stakeholders to inform the development of the proposed Framework.

The proposed Framework, the subject of this report, was posted for review on November 16, 2017 for a 60 day period ending January 15, 2018.

## DISCUSSION

The discussion and comments are divided into three areas:

- Overview of the Proposed Food and Organic Waste Framework
- Section 1: Potential Impacts to London (City of London, residents and businesses) of the Proposed Food and Organic Waste Framework – to be Submitted to the EBR
- Section 2: Comments on the Proposed Food and Organic Waste Framework - to be Submitted to the EBR

### Overview of Proposed Food and Organic Waste Framework

The proposed Framework aims to:

- Reduce the amount of food that becomes waste
- Remove food and organic waste from the disposal stream
- Reduce greenhouse gas emissions that result from food and organic waste
- Support and stimulate end markets that recover the value from food and organic wastes
- Increase accountability of responsible parties
- Improve data on food and organic waste
- Enhance promotion and education regarding food and organic waste

The MOECC indicates that these actions will also support the waste reduction and resource recovery objectives of the Strategy for a Waste Free Ontario and greenhouse gas reduction objectives of Ontario's Climate Change Action Plan.

The Proposed Food and Organic Waste Framework has two parts:

### **Part A: Proposed Food and Organic Waste Action Plan (Action Plan)**

The Action Plan outlines strategic commitments to be taken by the Province to address food and organic waste. The four commitments and the specific actions identified under each are:

1. Reduce Food Waste
  1. Province to work with partners to develop promotion and education tools to support food waste prevention and reduction
  2. Province to enhance and incorporate waste reduction and resource recovery activities within schools
  3. Province to work with the Government of Canada on preventing food waste
  4. Province to work with partners to support innovative approaches and tools to rescue surplus food
  5. Province to develop food safety guidelines to support the safe donation of surplus food
  6. Province to support academic research aimed at reducing and recovering food and organic waste
  7. Province to develop data collection mechanisms for measuring progress in waste reduction and resource recovery of food and organic waste
2. Recover Resources from Food and Organic Waste
  8. Province to amend the 3Rs Regulations to include food and organic waste and increase resource recovery across the IC&I sector
  9. Province to ban food and organic waste from ending up in disposal sites
  10. Province to support resource recovery of food and organic waste in multi-unit residential buildings
  11. Province to develop best management practices to support effective use of public waste receptacles
3. Support Resource Recovery Infrastructure
  12. Province to use modern regulator approaches to review existing approval processes and requirements for resource recovery systems
  13. Province to require standardized training for owners and operators of resource recovery systems that undertake composting and anaerobic digestion
  14. Province to review its D-Series Land Use Compatibility Guidelines to support the development of *resource recovery systems*
4. Promote Beneficial Uses
  15. Province to support healthy soils with strong standards and clear requirements for the use of soil amendments, while protecting the environment and human health
  16. Province to support development of renewable natural gas including consideration for linkages to food and organic waste
  17. Province to support green procurement practices, including the use of products, such as compost and digestate

(Source: MOECC, Proposed Food and Organic Waste Framework, November 2017)

The Action Plan includes a timeline which identifies: actions underway now, short-term actions (2018 to 2020) and long-term actions (2021 and beyond).

## Part B: Proposed Food and Organic Waste Policy Statement (Policy Statement)

The Policy Statement provides direction to further the provincial interest related to waste reduction and resource recovery of food and organic waste. Eight policies are identified within the proposed Policy Statement. These policies may be complemented by other future provincial policy statements or municipal policies that support and contribute to waste reduction and resource recovery of food and organic waste. The eight policies are:

1. Ontario Food Recovery Hierarchy
2. Targets
3. Reduce Food Waste
4. Recover Resources from Food and Organic Waste
5. Compostable Products and Packaging
6. Support Resource Recovery Infrastructure
7. Promote Beneficial Uses
8. Implementation and Interpretation

(Source: MOECC, Proposed Food and Organic Waste Framework, November 2017)

Section 1, the Potential Impacts to London (City of London, residents and businesses) of the Proposed Food and Organic Waste Framework, is found on the next page.

Section 2, Comments on the Proposed Food and Organic Waste Framework, follows Section 1.

Both the above sections will be submitted to the EBR.

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## SECTION 1

### Potential Impacts to London (City of London, residents and businesses) of the Proposed Food and Organic Waste Framework

#### General Comment

In general, City staff support the proposed Framework as it aligns with London's goals of reducing and diverting more food and organic waste from the landfill. The Framework provides enough flexibility to allow London to continue to explore local options that are best suited for London. The proposed targets and timeline of the Framework align with the direction that London is already committed to as part of the following:

- Environmental Assessment (EA) for the expansion of the W12A Landfill
- 60% Waste Diversion Action Plan (as part of the EA process)
- Development of a Resource Recovery Strategy

In many areas the Framework is light on details as it provides only suggestions as to how implementation will occur with the details to be contained in the regulations that come later. Final impacts, positive and negative, will be a function of further details provided by MOECC. These specific details need to be provided to all stakeholders as soon as possible. The specific details will add certainty to the overall program which will stimulate investment from the private sector, allow municipalities and other stakeholders to plan and invest, etc.

It is important to recognize that the Framework will have impacts on programs operated by the City of London, on residents of London that must take action on food and organic waste, and on businesses in London (e.g., retail shopping establishments and complexes, office buildings, restaurants, hotels and motels, hospitals, educational institutions and manufacturing establishments). In many cases, the impacts should be viewed positively (e.g., reducing food waste and/or creating more resources from food waste is good for the economy). However, in other cases additional costs will occur that may or may not be easily absorbed and may limit the ability to invest in other programs, projects and products. A number of anticipated impacts, positive and/or negative, in the context of London are identified below.

#### Prioritizing Food Waste Reduction

Both the Action Plan and the Policy Statement prioritize food waste reduction. This is not a surprise as the financial and environmental impacts of food waste are becoming increasingly known and understood.

It is estimated that each London household discards an average of \$450 to \$600 per year of food that could have been avoided. This translates to an amount of \$80 to \$100 million per year across London's total residential sector. This amount grows even higher when the value of food waste generated from businesses, institutions, etc., is included.

MOECC support to reduce this waste at the source will help Londoners save money, reduce environmental impact (e.g., reduce greenhouse gas generation), reduce the cost of managing food waste as a resource, and avoid this waste going to landfill.

London Council has recently approved 11 Guiding Principles for the EA and the development of the Resource Recovery Strategy including "Make Waste Reduction the First Priority."

#### Food and Organic Waste Disposal Ban

The Action Plan includes a proposed disposal ban on food and organic waste. In London this would mean that food and organic waste would not be permitted to be landfilled. The Action Plan recognizes the need for phased-in implementation and

timelines that will accommodate transition from current disposal systems to resource recovery systems.

The Framework provides little information on how a ban would be enforced although it does suggest that the Province has enforcement tools available. Experience in London with bans, both curbside and at the landfill, highlights that bans can be time consuming to enforce, require ongoing education and awareness, and can leave a negative impression on service delivery.

From a messaging perspective, announcing a food and organic waste disposal ban with targets of 70% (single family homes) and 50% (multi-residential homes), as noted in the next section, does pose a challenge.

A disposal ban may drive investment in resource recovery systems in London, creating jobs and supporting innovation. Additionally a disposal ban may also reduce the potential for odour generation at the W12A landfill as less putrescible waste would be received for disposal.

### Targets

The Policy Statement identifies sector specific resource recovery targets. Municipal targets for single family residential properties are based on population size and density and whether or not there is currently a source separation program for food and organic waste in place. The proposed target for a municipality such as London is:

- 70 per cent waste reduction and resource recovery of food and organic waste generated by single-family dwellings by 2025

The Policy Statement proposes a different target for multi-residential buildings in Southern Ontario. It also makes building owners responsible for targets, not municipalities. The proposed target for multi-residential buildings is:

- 50 per cent waste reduction and resource recovery of food and organic waste generated at the building by 2025

The proposed targets are required to be achieved through waste reduction and resource recovery efforts such as prevention, rescue of surplus food and resource recovery (e.g., composting or anaerobic digestion) of the following items:

- Food waste
- Organic waste (i.e. food preparation, soiled paper, leaf and yard waste)

Additional resource recovery and waste reduction efforts to achieve the prescribed targets are encouraged but not required for the following items:

- Personal hygiene wastes
- Sanitary products
- Additional paper and fibre products
- Compostable products and packaging
- Seasonal outdoor wastes
- Pet waste

Committee and Council have previously been provided with cost estimates to implement a source separated Green Bin Program for food and organic waste from single family homes as follows:

- Approximately \$4.5 million in annual operating costs which includes weekly organics and recycling collection (the organic portion is \$3.8 million), bi-weekly garbage collection, and estimated processing costs; and
- Approximately \$12 million in onetime capital costs which includes the net cost of additional collection vehicles, carts and kitchen catchers.

Implementing a program as outlined above is expected to be sufficient for London to achieve the proposed diversion targets. It is estimated that this expenditure will result in diversion between 12,000 and 14,000 tonnes (about 8 to 9% increased diversion) and a reduction in greenhouse gas of between 10,000 tonnes and 11,000 tonnes per year.

The Policy Statement specifies that targets are to be achieved through waste reduction and resource recovery efforts. Municipalities understand waste reduction to include home composting, grasscycling and food waste avoidance. Resource recovery includes leaf and yard waste composting and diversion of food waste through a program such as a green bin program.

The estimated current diversion of food and organic waste in London through existing programs is approximately 60% and it includes the quantity of leaf and yard waste that is composted and the estimated quantity of waste reduced through home composting and grasscycling. This 60% accounts for approximately 22% of London's existing overall waste diversion rate of 45%. The proposed target of 70% food and organic waste diverted/reduced is achievable and in line with London's overall 60% diversion goal from landfill by 2022.

Achieving the 50% target in the multi-residential sector, by building, will be much more difficult to achieve as the sector is typically starting at 0% food and organic waste diversion.

### Timeline

Overall the timeline of the proposed actions aligns reasonably well with both London's 60% Waste Diversion Action Plan and the development of the Resource Recovery Strategy timelines. Noted below are those Provincial actions of particular interest to London as they support local initiatives to be underway in the same timeframe.

Short term actions - 2018 to 2020:

- Support of actions associated with food waste reduction and rescue of surplus food
- Support development of renewable natural gas with consideration for linkages to food and organic waste

Long term actions - 2022 and beyond:

- Disposal ban on food and organic waste
- Support resource recovery in multi-residential buildings

### Curbside Collection

To increase recovery of resources from food and organic waste, the Policy Statement proposes that municipalities, (that do not currently provide collection of source separated food and organic waste) such as London, shall provide curbside collection of food and organic waste. This policy aligns with London's direction to provide this service as it will be a necessary component in London's 60% Waste Diversion Action Plan.

### Multi-Residential Buildings

The proposed Policy Statement requires that multi-residential buildings (not municipalities) provide collection of food and organic waste to their residents. This will impact how London implements a City-wide program. Options may include City provision of a collection service to building owners, or building owners may choose to contract directly to private collection companies. Multi-residential building owners (and not municipalities) are subject to the policy for resource recovery and waste reduction targets.

### Mixed Waste Processing

London's 60% Waste Diversion Action Plan will identify and assess the potential roles for mixed waste processing (versus source separation) to reach the waste diversion target of 60% by 2022. The potential role of mixed waste processing will also be identified in the Resource Recovery Strategy which will have a longer timeframe. Mixed waste processing is an alternative to a source separation program (i.e., green bin

program) and is currently being examined in other Ontario municipalities as both an alternative and supplement to green bin programs. The City of London is part of a municipal working group sharing knowledge and conducting research into mixed waste processing.

In the case of municipalities such as London, that do not currently provide collection of source separated food and organic waste, the Framework permits consideration of the implementation of alternative programs, such as mixed waste processing.

### Residents of London

Impacts to Londoners can be summarized as following:

- In general, the implementation of the Action Plan will have two significant impacts on Londoners: 1) there will be a cost of new diversion and reduction programs to taxpayers, and 2) households will be asked to develop new daily habits for how they manage food waste. There is potential for households to offset the tax dollar increase by adopting routines to save money by reducing food waste. The impact to tax payers may be further offset as a result of changes to Blue Box program funding which will reduce municipal costs for this program.
- Province wide actions and messages that work to reduce food waste will be welcomed by Londoners and have the potential to save money for households. Families and individuals in need of food assistance may benefit from food rescue programs.
- Regarding the potential impact of a city-wide organic diversion program, the extent of the impact on daily routines will depend on the type of program that London adopts. A green bin program requires more effort as households will need to take the time to sort their kitchen organic waste. A mixed waste processing program will have little to no impact on the day-to-day routine of households as they will continue to place food organic waste in the garbage and to take to the curb as they already do.
- A program to divert household organics will be welcomed by many Londoners. Since 2011 when London conducted a green bin pilot project, many citizens have been vocal in their desire to see a City wide program.
- The introduction of new compostable packaging and guidelines for best-before-dates will require an adjustment. On the other hand, consistent Province-wide promotion and education campaigns will reduce confusion and especially as people move from one area of Ontario to another.

### Institutional, Commercial & Industrial (IC&I) Sectors

Impacts to the IC&I sectors can be summarized as following:

- They will be required to achieve either 50 per cent or 70 per cent (the nature, size and amount of food and organic waste produced at each establishment determines which target is applicable) waste reduction and resource recovery of food and organic waste by 2025;
- They will be required to develop and implement education programs for both the consumers of their products and industry sector based groups. The education programs are to be aimed at preventing and reducing consumer food waste and promoting industry best practices to prevent and reduce food waste;
- They will be encouraged to identify where food waste occurs in operational practices, undertake food waste audits and implement measures to prevent and reduce food waste (e.g., food rescue); and
- The above noted impacts will require development of new programs, systems and possibly infrastructure which will have financial impacts, however may also create jobs and foster innovation.



## SECTION 2

### Comments on Proposed Food and Organic Waste Framework

Comments on both parts of the Framework have been developed from three perspectives and captured on Tables 1 and 2 as follows:

1. Whether or not the proposed provincial policy is consistent with Council Direction. Council Direction refers to recent direction with respect to the ongoing development of the Residual Waste Disposal Strategy, Resource Recovery Strategy and 60% Waste Diversion Action Plan along with other directions for solid waste management;
2. Whether or not the proposed provincial policy is consistent with Council's Strategic Plan (2015-2019) with a focus on Building a Sustainable City, specifically Robust Infrastructure and a Strong and Healthy Environment; and
3. Either brief or longer comments based on City staff experience from operating programs and projects in London coupled with knowledge transfer from provincial waste management organizations.

**Table 1: Summary of Comments on Part A Proposed Food and Organic Waste Action Plan: Commitments and Specific Actions**

Action Plan Commitment:		Consistent With		Comments
		Council Direction	Strategic Plan	
<b>Reduce Food Waste</b>				
1	Province to work with partners to develop promotion and education tools to support food waste prevention and reduction	Yes	Yes	• City staff support
2	Province to enhance and incorporate waste reduction and resource recovery activities within schools	Yes	Yes	• City staff support
3	Province to work with the Government of Canada on preventing food waste	N/A	Yes	• City staff support
4	Province to work with partners to support innovative approaches and tools to rescue surplus food	Yes	Yes	• City staff support
5	Province to develop food safety guidelines to support the safe donation of surplus food	N/A	Yes	• City staff support • Middlesex-London Health Unit involved
6	Province to support academic research aimed at reducing and recovering food and organic waste	Yes	Yes	• City staff support • Additional comments below
7	Province to develop data collection mechanisms for measuring progress in waste reduction and resource recovery of food and organic waste	Yes	Yes	• City staff support • Additional comments below
<b>Recover Resources from Food and Organic Waste</b>				
8	Province to amend the 3Rs Regulations to include food and organic waste and increase resource recovery across the IC&I sector	Yes	Yes	• City staff support

**Table 1: Summary of Comments on Part A Proposed Food and Organic Waste Action Plan: Commitments and Specific Actions**

Action Plan Commitment:		Consistent With		Comments
		Council Direction	Strategic Plan	
9	Province to ban food and organic waste from ending up in disposal sites	N/A	N/A	<ul style="list-style-type: none"> <li>• City staff require more details on the advantages, disadvantages and costs</li> <li>• Additional comments below</li> </ul>
10	Province to support resource recovery of food and organic waste in multi-unit residential buildings	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>
11	Province to develop best management practices to support effective use of public waste receptacles	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>
<b>Support Resource Recovery Infrastructure</b>				
12	Province to use modern regulator approaches to review existing approval processes and requirements for resource recovery systems	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>
13	Province to require standardized training for owners and operators of resource recovery systems that undertake composting and anaerobic digestion	N/A	N/A	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>
14	Province to review its D-Series Land Use Compatibility Guidelines to support the development of resource recovery systems	N/A	N/A	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>
<b>Promote Beneficial Uses</b>				
15	Province to support healthy soils with strong standards and clear requirements for the use of soil amendments, while protecting the environment and human health	N/A	N/A	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>
16	Province to support development of renewable natural gas including consideration for linkages to food and organic waste	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>
17	Province to support green procurement practices, including the use of products, such as compost and digestate	N/A	N/A	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>

**Additional Comments from Table 1:**

Action Item:	
6	<ul style="list-style-type: none"> <li>• There is extensive research currently underway in London. Some of these details were shared with MOECC staff on October 26, 2017.</li> <li>• London is developing as a centre of knowledge in this area with many partners including Western University, 2cg Consulting, etc.. Food waste avoidance is a component of the London Waste to Resources Innovation Centre.</li> </ul>

<b>Additional Comments from Table 1:</b>	
7	<ul style="list-style-type: none"> <li>• There is no current credible data source for tracking this information. This is a key step.</li> <li>• Timing of the development of robust measurement tools is critical in relation to timing of diversion targets. Meeting targets without reliable measurements is not reasonable.</li> <li>• Ease in data collection including financial considerations is paramount to reliable, annual data.</li> </ul>
8	<ul style="list-style-type: none"> <li>• The action has little to no details on enforcement actions for non-compliance. It is recognized by many that the low recycling rate in the IC&amp;I sector is a function of the limited enforcement undertaken on the regulations by MOECC. How is this going to improve as the regulation is expanded to include more materials not fewer materials?</li> </ul>
9	<ul style="list-style-type: none"> <li>• Consultation must occur with operators of disposal sites (both public and private) on how best to implement, and whether a ban at disposal sites is the most efficient way to achieve the intended commitment</li> <li>• Consideration must be given to banning food and organic waste from entering the waste stream, rather than a ban from having it enter disposal sites. It would be much easier to identify and manage these materials prior to being mixed with items destined for disposal.</li> <li>• A question must be answered; how do you ban something but only have targets of 50, 70%, etc. for food and organic waste?</li> <li>• Consideration should be given to disposal restrictions versus bans; the role of incentives/disincentives, etc.</li> <li>• Who is going to pay for implementing and enforcing the ban?</li> </ul>
12	<ul style="list-style-type: none"> <li>• Any modernized regulator approach should focus on striking the right balance between the need of existing and proposed resource recovery systems and neighbouring land uses.</li> <li>• The Province must implement a robust, fast track approval system that reduces the amount of work on matters that can be moved on quickly and focus the efforts on the matters that are significant to municipalities and operators (e.g., compatible land uses, mandatory mitigative measures for the community, easy to enforce solutions for non-compliance that build confidence in the community, etc.).</li> <li>• The Province must demonstrate how challenges of today's processing facilities can be addressed with both today's processing facilities that will take in more materials and with the new processing facilities.</li> </ul>
13	<ul style="list-style-type: none"> <li>• This will provide additional accountability for owners and operators of facilities that undertake these activities.</li> <li>• Training must include understanding community expectations, municipality expectations, etc. and be clear on consequences.</li> </ul>
14	<ul style="list-style-type: none"> <li>• The review should focus on striking the right balance between the need for addition resource recovery facility processing capacity and avoiding past facility siting land use conflicts.</li> </ul>
16	<ul style="list-style-type: none"> <li>• Aligns with previous direction on utilization of options for landfill gas.</li> </ul>

**Table: 2 Summary of Comments on Part B Proposed Food and Organic Waste Policy Statement: Individual Policies**

Policies		Consistent With		Comments
		Council Direction	Strategic Plan	
1	Ontario Food Recovery Hierarchy	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>
2	Targets	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>

**Table: 2 Summary of Comments on Part B Proposed Food and Organic Waste Policy Statement: Individual Policies**

Policies		Consistent With		Comments
		Council Direction	Strategic Plan	
3	Reduce Food Waste	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>
4	Recover Resources from Food and Organic Waste	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>
5	Compostable Products and Packaging	Maybe	N/A	<ul style="list-style-type: none"> <li>• The issues created for products and packages that can be either recycled or composted/ digested has not been addressed</li> <li>• Additional comments below</li> </ul>
6	Support Resource Recovery Infrastructure	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>
7	Promote Beneficial Uses	Yes	Yes	<ul style="list-style-type: none"> <li>• City staff support</li> </ul>
8	Implementation and Interpretation	N/A	N/A	<ul style="list-style-type: none"> <li>• City staff support</li> <li>• Additional comments below</li> </ul>

**Additional Comments from Table 2:**

Additional Comments from Table 2:	
Policy #:	<ul style="list-style-type: none"> <li>• In general City staff support the incorporation of targets into the policy.</li> <li>• It is not clear what is specifically included in the targets. Is home composting, grasscycling, food waste avoidance, etc. included? Provide a sample calculation for a community of 100,000, for example, so it is very clear.</li> <li>• It is not clear as to what mechanism the MOECC plans to use to enforce the proposed targets, or even if they are intending to enforce them.</li> <li>• The current regulations dealing with IC&amp;I recycling have not been well enforced in the Province. Limited enforcement of the targets specifically on the IC&amp;I sector will have significant impacts on achieving some of the proposed actions such as implementing a disposal ban.</li> <li>• The quantity of organics diverted by the targets will be used as a calculation for sizing processing facilities; therefore the role of targets must be a priority.</li> </ul>
2	<ul style="list-style-type: none"> <li>• Consideration should be given to how municipalities could assist the Province and owners of multi-residential buildings to undertake this action.</li> <li>• Has the MOECC analyzed the advantages and disadvantages of including items like personal hygiene waste (e.g., diapers) which are composite materials with only some organic materials? These have the potential to impact facility operations, may lead to additional odour issues, do not add value to compost quality, come out as contamination, etc. Yes, they provide one answer to biweekly garbage collection challenges as service is weekly. Pet waste in plastic bags has similar challenges. Undertake and share research so municipalities are not required to individually assess.</li> <li>• Define “the direct discharge of food waste or organic waste to a sewer”. The current definition says “including . . . garburators or other grinding devices.” What else is included? If nothing else is included, then be precise.</li> </ul>
4	<ul style="list-style-type: none"> <li>• Is there any rationale for 300kg/week to trigger a source separation program for a specific location within the IC&amp;I sector? What happens to locations that are above this number for a portion of the year, but below for most weeks?</li> <li>• Why is the IC&amp;I sector required to source separate (“shall”) when other diversion methods may be better in different regions of Ontario?</li> </ul>

<b>Additional Comments from Table 2:</b>	
5	<ul style="list-style-type: none"> <li>• Significant work is required in this area as there is an increasing number of packaging products that claim to be compostable that are ending up in Blue Box Programs, and creating sorting and processing challenges.</li> <li>• These products may appear similar to consumers and result in confusion as to which diversion stream (i.e., organics or Blue Box) they are intended to be managed.</li> <li>• The MOECC should determine and undertake the appropriate action to limit any potential confusion for consumers on how to manage compostable products and packaging. Without action, processing cost increases and/or product quality issues will occur. Municipalities and organic processors will have very little control over this.</li> </ul>
6	<ul style="list-style-type: none"> <li>• Similar comments that were provided on Table 1 action items 12 and 14, i.e. an appropriate balance is required to be struck between the needs of new and existing Resource Recovery Infrastructure to avoid in the future incompatible neighbouring land use conflicts.</li> <li>• “Fostering Timely Approvals”, Clause 6.2 says “should”. Change to “shall”. The future system must not cause more impacts to a community. The same can be said for 6.3 and 6.4, these need to be “shall” not “should”.</li> <li>• 6.11, regarding working with the community, needs to change from “should” to “shall”.</li> <li>• Support for Resource Recovery Infrastructure should be undertaken in a holistic approach to ensure the infrastructure is capable of achieving the goals of the Framework.</li> <li>• Specifically, consideration should be given to the characteristics and nature of the food and organic waste materials to be managed; including how the nature of the source separation program, inclusive of the collection and transportation processes and the resultant time frame for the materials to be received by a processing facility, may impact the characteristics and nature of the food and organic waste.</li> <li>• The Province needs to specifically state and continue to examine new technologies that may divert more materials, reduce more GHG emissions and/or potentially lower costs. It needs a clause to keep the door wide open for other opportunities that provide equal to or more benefits for Ontario. Regional opportunities may be reduced with Province-wide focus.</li> </ul>
8	<ul style="list-style-type: none"> <li>• 8.4, regarding working with municipalities, needs to change from “should” to “shall”. The Province needs to understand that the municipal role in achieving the desired outcomes in the Framework is highly contingent on municipal involvement and support. This has already been demonstrated in Ontario’s Blue Box and other waste diversion systems.</li> </ul>

The final section is called Measuring Success and identified 4 specific areas to monitor and measure progress:

<b>Measurement</b>	<b>Comment</b>
Move towards zero food and organic waste	<ul style="list-style-type: none"> <li>• Need to consider the cost savings or cost expenditures in the measure, along with environment and social benefits</li> </ul>
Reduce greenhouse gas emissions from food and organic waste	<ul style="list-style-type: none"> <li>• Need to consider the cost savings or cost expenditures in the measure, along with environment and social benefits</li> </ul>
Increase resource recovery	<ul style="list-style-type: none"> <li>• Need to consider the cost savings or cost expenditures in the measure, along with environment and social benefits</li> </ul>
Support evidence-based decision-making	<ul style="list-style-type: none"> <li>• This is essential for new, emerging and next generation technologies to divert food and organic waste</li> </ul>