


Part 6: Will the Environment Win? Recommendations

Abstract

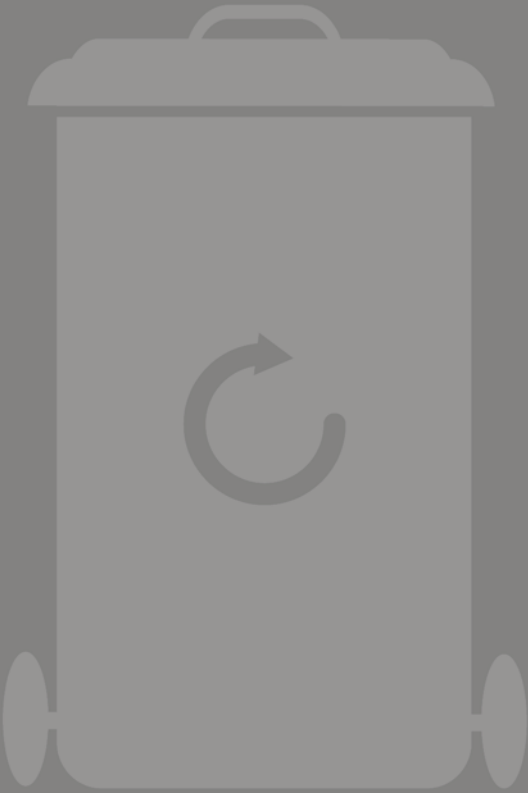
The *RRCEA* and Strategy establish ambitious goals and identify many important actions. If properly implemented, these will help move Ontario towards a zero-waste economy, and ultimately deliver a variety of environmental benefits.



Essential next steps.

**PART 6:
WILL THE ENVIRONMENT WIN? RECOMMENDATIONS**

- 6.0 Turning Promise into Action 64**
- 6.1 Priority Actions 64**
 - 6.1.1 Organic Diversion 64
 - 6.1.2 Getting Recycling Standards Right..... 65
 - 6.1.3 IC&I Sectors Must Pull Their Weight 65
 - 6.1.4 Learning From Our Mistakes..... 65
 - 6.1.5 Driving the Circular Economy Across Government 65
- 6.2 Summary of Recommendations 66**



6.0 Turning Promise into Action

The new *RRCEA* and Strategy set out the groundwork to divert much more waste and move Ontario towards a zero-waste economy. The magnitude of this initiative should not be understated. **The introduction of the *RRCEA* is a significant landmark.** The MOECC worked hard with stakeholders to try to resolve many of the long-standing issues with the *WDA*. The environmental impacts of rampant consumption and waste are widespread and long-lasting. Building a circular economy, including well developed diversion activities, could address many of these issues and, if properly implemented, will be a win for the environment.

The most admirable, and ambitious, aspect of the Ontario government's new approach is the opportunity it creates for the MOECC to move beyond "waste diversion" to the larger vision of a circular economy. Forty years of experience have shown that waste cannot be effectively managed as a stand-alone issue of problems with landfills. The growing climate footprint of resource extraction and waste only adds to the urgency of a broader approach. The ECO is happy to see that the MOECC has identified cross-linkages among the *RRCEA*, the Strategy, the *Climate Change Mitigation and Low-carbon Economy Act, 2016*, and the province's Climate Change Action Plan.

While the *RRCEA* and Strategy hold great promise, **what matters, as always, is implementation.** Simultaneous adoption of both the *RRCEA* and the new climate law could strain the MOECC's resources, capacity and attention. Although the Strategy does include a general timeline, **the ECO recommends that the MOECC set deadlines for the actions identified in the Strategy.** Without clear deadlines, it is easy for important tasks to fall off priority lists, and difficult for the public to hold the ministry accountable. Such a work plan would assist both the MOECC and stakeholder groups to identify what activities require immediate focus and resources.

6.1 Priority Actions

Among the many worthy activities identified in the Strategy, a few stand out to the ECO as being particularly important. The ECO believes these items – set out below – are deserving of special priority because they are critical to laying a strong foundation upon which the later success of diversion programs depend, or because they offer opportunities for substantial improvements in diversion in the short-term. The ECO will be paying particularly close attention to each of these items through to the end of 2018, by which point we expect to see measurable progress.

6.1.1 Organic Diversion

If Ontario is serious about eliminating greenhouse gas emissions from waste, it will require extensive diversion of food and yard wastes. Maximizing organic diversion from landfills is central to reducing greenhouse gas emissions from waste, as well as minimizing the creation of leachate. In fact, organics diversion can have multiple climate benefits. As documented in the ECO's *Every Drop Counts* report, organic waste could be used to generate renewable natural gas, to displace fossil fuels now used to make power, to heat buildings and to fuel vehicles. And, if composted, organic waste can put organic matter (carbon) back into agricultural soil.¹³⁶ Accordingly, the ECO strongly supports the MOECC's development of an Organics Action Plan.

The ECO recommends that the MOECC adopt some form of disposal ban on food waste. Many leading waste reduction jurisdictions around the world already use disposal bans. For example, Nova Scotia, which has a per capita disposal rate 40% lower than any other province or territory in Canada, has banned organics (as well as most Blue Box recyclables, household electronics and other divertible materials) from landfills.¹³⁷

However, before implementing such a ban, Ontario must substantially increase its organic processing capacity.¹³⁸ One key obstacle to such expansion is the MOECC's slow, expensive and unpredictable approvals process. At present, proposed facilities

can wait years for a decision on an approval application. Instead, proposed operators should be reasonably confident that well-planned, appropriately-sited facilities will be approved within months, not years. Given the importance of organics diversion, **the ECO recommends that the MOECC make the process for approving anaerobic digestion and composting facilities fast and predictable, while still protecting public health and environmental interests.**

6.1.2 Getting Recycling Standards Right

Recycling standards determine what processes or outcomes qualify as “diversion” under the *RRCEA*. If they are too permissive, the quality of the recycled material may suffer (which is bad for the marketplace), and environmental benefits may be compromised. **Lax recycling standards make it difficult for companies using better, but more expensive, recycling processes to compete** (see the example of the proposed battery recycling discussed in Part 4.3.2).

The ECO recommends that the MOECC develop recycling standards that are clear, enforceable and provide a high level of environmental protection.

Such standards should incorporate objective, measurable criteria so they are easy to follow and easy to enforce. The standards must then be enforced.

6.1.3 IC&I Sectors Must Pull Their Weight

The IC&I sectors, including construction, retail and manufacturing, have played too small of a role in diversion for too long. Since these sectors generate far more waste and divert much less than residences, **Ontario cannot make substantial progress on its diversion goals without the IC&I sectors pulling their weight.** Moreover, the IC&I sectors are critical to the development of a circular economy, since they encompass businesses.

The Strategy identifies several initiatives to increase IC&I diversion, one of which is reviewing the 3Rs regulations that set out rules for source separation programs in some IC&I settings. Some other jurisdictions, such as Nova Scotia, have stronger source separation obligations for IC&I than Ontario, and such obligations are compatible with longer-term IC&I initiatives. **The ECO recommends that the MOECC expand and enforce source separation and diversion obligations for the IC&I sectors** (currently under Ontario Regulations 102/94, 103/94 and 104/94).

6.1.4 Learning From Our Mistakes

As this Special Report shows, many of the ambitions in the *Waste-Free Ontario Act* are not new. For decades, Ontario has tried to get Ontarians to reduce, reuse and recycle, and to create self-supporting funding models to keep waste out of landfill and litter. These decades of effort have produced both successes and failures, but it has remained stubbornly difficult to make profitable the reduction, reuse or recycling of most wastes, and the reuse of some collected materials. As a result, much waste policy has been bogged down in wrenching questions about why waste diversion costs so much, and who should pay for it. As time passes and staff change, some of this history may have been forgotten.

As the old saying goes, “those who do not learn from history are doomed to repeat it”. The ECO suspects that **many of the same economic issues could continue to challenge Ontario waste policy under the new Act.** To avoid repeating the same mistakes, **the ECO recommends that the MOECC document how new waste policies compare to those tried before, and what lessons have been learned from previous efforts.**

6.1.5 Driving the Circular Economy Across Government

Finally, the MOECC must not lose sight of its vision for transformative change through the circular economy. The ECO will be paying close attention to how the provincial government pursues this vision. While the Strategy identifies some useful initiatives,



the MOECC should also look for opportunities to support the promising circular economy-focused work of non-government organizations, collaboratives and private companies. For example, **the province must support self-sustaining markets for used materials.** Where such markets exist, they should be fostered; where such markets do not exist, regulatory interventions may be appropriate. **The ECO recommends that the MOECC make the ultimate goal of Ontario's circular economy policies the creation of profitable markets for all end-of-life materials.**

Market mechanisms that support circularity will be critical to Ontario's ultimate success, and will require cross-ministry coordination (i.e., through labour, education, fiscal, government and consumer services, and business policies). Accordingly, **the ECO recommends that the MOECC work with other ministries to integrate circular economy objectives into policy and practice across government.**

6.2 Summary of Recommendations

The ECO recommends that the Ministry of the Environment and Climate Change:

1. set deadlines for the actions identified in its *Strategy for a Waste Free Ontario*;
2. adopt some form of disposal ban on food waste;
3. make the process for approving anaerobic digestion and composting facilities fast and predictable, while protecting public health and environmental interests;
4. develop recycling standards that are clear, enforceable and provide a high level of environmental protection;
5. expand and enforce source separation and diversion obligations for the IC&I sectors;
6. document how new waste policies compare to those tried before, and what lessons have been earned from previous efforts;
7. make the ultimate goal of Ontario's circular economy policies the creation of profitable markets for all end-of-life materials; and
8. work with other ministries to integrate circular economy objectives into policy and practice across government.

