



THE REGIONAL MUNICIPALITY OF PEEL
WASTE MANAGEMENT STRATEGIC ADVISORY COMMITTEE
AGENDA

Meeting #: WMSAC-1/2021
Date: Thursday, January 21, 2021
Time: 2:00 PM - 3:30 PM
Location: Council Chamber, 5th Floor
Regional Administrative Headquarters
10 Peel Centre Drive, Suite A
Brampton, Ontario
Members: D. Damerla, G.S. Dhillon, P. Fortini, N. Iannicca, J. Innis , M. Mahoney, K. Ras,
I. Sinclair, R. Starr

The meeting will be live streamed on <http://www.peelregion.ca/>.

1. CALL TO ORDER
2. ELECTION OF CHAIR AND VICE CHAIR
3. DECLARATIONS OF CONFLICTS OF INTEREST
4. APPROVAL OF AGENDA
5. DELEGATIONS
 - 5.1. Nancy Milton, Citizen
Regarding the Townhouse Waste Collection and the Neighbourhood Recycling Blue Boxes
(Related to 5.2 and 6.1)
 - 5.2. Monique Mo, Citizen
Regarding the Townhouse Waste Collection and the Neighbourhood Recycling Blue Boxes
(Related to 5.1 and 6.1)
6. REPORTS
 - 6.1. Townhouse Waste Collection Options
(Related to 5.1 and 5.2)
 - 6.2. Peel's Comments on the Provincial Proposal to Amend the Food and Organic Waste Policy Statement

- 6.3. Peel's Comments on the Federal Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution

7. COMMUNICATIONS

8. OTHER BUSINESS

9. IN CAMERA

10. NEXT MEETING

Thursday, April 1, 2021

9:30 a.m. – 11:00 a.m.

Council Chamber, 5th floor

Regional Administrative Headquarters

10 Peel Centre Drive, Suite A

Brampton, ON

11. ADJOURNMENT

FOR OFFICE USE ONLY

MEETING DATE YYYY/MM/DD 2021/01/21	MEETING NAME WMSAC
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Attention: Regional Clerk
Regional Municipality of Peel
10 Peel Centre Drive, Suite A
Brampton, ON L6T 4B9
Phone: 905-791-7800 ext. 4582
E-mail: council@peelregion.ca

DATE SUBMITTED YYYY/MM/DD 2021/01/13

NAME OF INDIVIDUAL(S) Nancy Milton

POSITION(S)/TITLE(S)

NAME OF ORGANIZATION(S) A member of the community who cares for the environment

E-MAIL [REDACTED]	TELEPHONE NUMBER [REDACTED]	EXTENSION
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REASON(S) FOR DELEGATION REQUEST (SUBJECT MATTER TO BE DISCUSSED) Over two years ago our neighbourhood had their recycling blue boxes taken away. We were told bins with lids would soon follow. The amount of plastic being used BECAUSE the bins were taken away with no "temporary" plan isn't ok, and two years is an unacceptable time for delivering on this tactical need.

A formal presentation will accompany my delegation <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Presentation format: <input type="checkbox"/> PowerPoint File (.ppt) <input type="checkbox"/> Adobe File or Equivalent (.pdf)		
<input type="checkbox"/> Picture File (.jpg) <input type="checkbox"/> Video File (.avi,.mpg) <input type="checkbox"/> Other <input type="text"/>		
Additional printed information/materials will be distributed with my delegation : <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Attached		

<p>Note: Delegates are requested to provide an electronic copy of all background material / presentations to the Clerk's Division at least ten (10) business days prior to the meeting date so that it can be included with the agenda package. In accordance with Procedure By-law 56-2019, as amended, delegates appearing before Regional Council or Committee are requested to limit their remarks to 5 minutes and 10 minutes respectively (approximately 5/10 slides).</p> <p>Delegates should make every effort to ensure their presentation material is prepared in an accessible format.</p> <p>Once the above information is received in the Clerk's Division, you will be contacted by Legislative Services staff to confirm your placement on the appropriate agenda.</p>

<p align="center">Notice with Respect to the Collection of Personal Information (Municipal Freedom of Information and Protection of Privacy Act)</p> <p>Personal information contained on this form is authorized under Section 5.4 of the Region of Peel Procedure By-law 56-2019, as amended, for the purpose of contacting individuals and/or organizations requesting an opportunity to appear as a delegation before Regional Council or a Committee of Council. The Delegation Request Form will be published in its entirety with the public agenda. The Procedure By-law is a requirement of Section 238(2) of the <i>Municipal Act, 2001</i>, as amended. Please note that all meetings are open to the public except where permitted to be closed to the public under legislated authority. All Regional Council meetings are audio broadcast via the internet and will be posted and available for viewing subsequent to those meetings. Questions about collection may be directed to the Manager of Legislative Services, 10 Peel Centre Drive, Suite A, 5th floor, Brampton, ON L6T 4B9, (905) 791-7800 ext. 4462.</p>

Please save the form to your personal device, then complete and submit via email attachment to council@peelregion.ca

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Regional Municipality of Peel
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Brampton, ON L6T 4B9
Phone: 905-791-7800 ext. 4582
E-mail: council@peelregion.ca

DATE SUBMITTED YYYY/MM/DD 2021/01/14

NAME OF INDIVIDUAL(S) Monique Mo

POSITION(S)/TITLE(S) Citizen

NAME OF ORGANIZATION(S)

E-MAIL [REDACTED]	TELEPHONE NUMBER	EXTENSION
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REASON(S) FOR DELEGATION REQUEST (SUBJECT MATTER TO BE DISCUSSED) Townhouse Waste Collection

A formal presentation will accompany my delegation <input type="checkbox"/> Yes <input type="checkbox"/> No		
Presentation format: <input type="checkbox"/> PowerPoint File (.ppt) <input type="checkbox"/> Adobe File or Equivalent (.pdf)		
<input type="checkbox"/> Picture File (.jpg) <input type="checkbox"/> Video File (.avi,.mpg) <input type="checkbox"/> Other <input type="text"/>		
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REPORT TITLE: Townhouse Waste Collection Options

FROM: Andrea Warren, Interim Commissioner of Public Works

RECOMMENDATION

That the townhouse waste collection options outlined in the report of the Interim Commissioner of Public Works, titled “Townhouse Waste Collection Options”, be approved;

And further, that the consultation plan outlined in the subject report be approved;

And further, that staff align the implementation of the townhouse waste collection options selected by the individual townhouse complexes with the new curbside collection contracts anticipated to commence on October 1, 2024;

And further, that townhouse complexes requesting to be converted to cart-based collection prior to the new collection contract in 2024 be allowed to do so provided the proposed approach outlined in the subject report are met.

REPORT HIGHLIGHTS

- To date, 18,138 townhouse units have been converted to a cart-based waste collection program, which represents approximately 50 per cent of all townhouse units in Peel.
- At its June 13, 2019 meeting, Regional Council directed staff to cease all further implementation of the cart system in townhouse complexes and report back to the Waste Management Strategic Advisory Committee on alternative townhouse waste diversion strategies, including a consultation plan for engaging the townhouse residents prior to changing their current collection system.
- Staff reviewed several service options and used a multi-pronged evaluation process to determine which options best align with Peel’s strategic policy objectives while meeting the needs of residents.
- Options developed utilize varying combinations of carts for garbage, carts or bags for recycling and the existing size organics cart or a smaller organics cart.
- Staff will consult with townhouse complexes in 2022 and implement their chosen option in 2024.
- Staff recommends that townhouse complexes that have already been converted to carts remain on cart-based collection.

DISCUSSION

1. Background

In January 2016, most curbside households, including all freehold townhouses, in the Region of Peel were converted from a weekly, bag-based waste collection program to a bi-

Townhouse Waste Collection Options

weekly cart-based waste collection program. At that time, most townhouse condominium complexes were converted to bi-weekly bag-based collection for garbage and recycling, and weekly organics collection, using the same larger organics cart rolled out to other curbside households. Since the fall of 2016, staff converted 18,138 townhouse units, representing approximately 50 per cent of all townhouse units in Peel, from bag-based to cart-based collection.

At its June 13, 2019 meeting, Regional Council directed staff to immediately cease all further implementation of the cart system in townhouse complexes and report back to the Waste Management Strategic Advisory Committee on alternative townhouse waste diversion strategies, including a consultation plan for engaging the townhouse residents prior to further conversions (Resolution 2019-609).

The recommended approach for townhouse waste collection options in this report incorporates the results of an environmental scan of a number of other large and medium sized Ontario municipalities; feedback received from townhouse residents, property management and Regional Council; and, considers how these options align with Regional strategic policy objectives such as increasing diversion; seamlessly transitioning the Blue Box Program to Extended Producer Responsibility (EPR); potentially implementing a user pay system; and preparing for the 2024 collection contracts.

2. Environmental Scan Results

The first step to determining options to replace the current three cart program for townhouse complexes was the completion of an environmental scan to gather information on how other Ontario municipalities collect from townhouses. This scan included the impact of the collection systems on diversion, resident satisfaction and concerns, contractor concerns and other challenges. The scan was completed through a questionnaire sent to municipalities with members on the Regional Public Works Commissioners of Ontario waste subcommittee and a total of seven responses were received.

The majority of municipalities offer the same service level in townhouse complexes that they do for regular curbside collection. Generally speaking, municipalities with bag-based collection for curbside customers offered bag-based collection for townhouse customers; and, municipalities with cart-based collection for curbside customers offered cart-based collection for townhouse customers. While all municipalities offered cart-based collection for organics, some used a smaller green bin than Peel. Municipalities that utilize automated collection vehicles tended to use 80 or 100 litre green bins and municipalities with manual collection tended to use 46 litre organics carts. Some of those municipalities offer alternatives, such as front-end collection when the collection vehicle cannot access each home individually. Appendix I includes a more detailed summary of the information received from municipalities that responded to the questionnaire.

Public Feedback

Prior to pausing the cart rollout in 2019, staff engaged residents through public consultation sessions, surveys, focus groups, collection day set out studies and site visits. Through these activities, residents strongly expressed their key concerns which included the size of the new organics cart, the desire for a smaller organics cart, finding storage space for three carts indoors (as outdoor storage of carts is not appealing), the option for containers that they could carry to the curb and a desire for an alternative solution to the current three cart program.

Townhouse Waste Collection Options

3. Townhouse Waste Collection Options

Based on the information received through the environmental scan and from resident feedback, staff developed the following collection service options to consider for townhouses:

1. Cart-based collection with individual households having a choice between 120, 240 and 360 litre garbage and recycling carts and a choice of the full sized 100 litre organics cart or a smaller 46-80 litre organics cart
2. Cart-based collection for garbage with individual households having a choice between 120, 240 and 360 litre garbage carts, bag-based collection for recycling and a choice of the full sized 100 litre organics cart or a smaller 46-80 litre organics cart
3. Bag-based collection for garbage and recycling and a choice of the full sized 100 litre organics cart or a smaller 46-80 litre organics cart
4. Front End Collection for recycling, garbage and organics

If approved by Council, the option of a 46-80 litre organics cart would be made available to townhouse complexes that have already been converted but not offered to curbside residents in detached, semi-detached or freehold townhouses.

4. Analysis and Evaluation of Townhouse Waste Collection Options

The following evaluation criteria for the townhouse waste collection options were developed considering feedback from Regional Council and residents:

- Supports the Region's Strategic Policy Objectives:
 - Increases Diversion – the option supports the diversion objectives of the Region's long-term waste management strategy and its 3Rs diversion target of 75 percent by 2034.
 - Allows for a Seamless Transition to Extended Producer Responsibility (EPR) - to prepare for the Blue Box Program transition, the draft regulation is considering the Region's preferred transition date which aligns with the commencement of the new collection contracts in 2024. Any changes implemented to Peel's current blue box program from now to transition, including changes to the collection system, may not be utilized or funded by the producers under the new blue box program.
 - Allows for Potential Future User Fees – a potential user fee system is being investigated in which residents would be charged a fee based on the size of their garbage cart.
- Addresses Resident Concerns – the service option supports residents' concerns regarding storage and the desire for a smaller green bin.
- Reduces Litter – the service option prevents blowing papers and other lightweight items, reducing neighbourhood litter.
- Prevents Vermin and Vector – the service option prevents vermin and vector from accessing food sources in waste.

The criteria were applied in an evaluation process to eliminate any options that did not align with the Region's objectives or reasonably address the concerns of residents. The results of the evaluation are shown in Table 5, below. A more detailed summary of the evaluation is included in Appendix II.

Townhouse Waste Collection Options

Table 1 - Townhouse Option Evaluation Summary

Service Option	Alternative Strategy	Increases Diversion	EPR	User Fees	Addresses Resident Concerns	Reduces Litter	Prevents Vermin & Vector	Recommended
1	Cart-based garbage and recycling collection with choice of 120, 240 and 360 litre carts. Cart-based organics collection with choice of 46-80 litre or 100 litre cart.	Yes	Yes	Yes	Yes*	Yes	Yes	Yes
2	Cart-based garbage collection with choice of 120, 240 and 360 litre carts. Bag-based recycling collection. Cart-based organics collection with choice of 46-80 litre or 100 litre cart.	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Bag-based garbage and recycling collection. Cart-based organics collection with choice of 46-80 litre or 100 litre cart.	No	Yes	Yes	Yes	Yes	No	No
4	Front End Collection for recycling, garbage and organics.	No	Yes	Yes	No	Yes	No	No

*if small carts are selected

As Options 3 and 4 did not adequately meet all the evaluation criteria, staff recommends that these not be given further consideration. Options 1 and 2 have been brought forward as viable collection options for townhouse residents. The current three-cart program will continue to be available to townhouse complexes as part of option 1.

5. Implementation Timing

The current collection contracts allow the Region to convert townhouse complexes to the three-cart program, including the 100 litre organics cart or have the locations remain on current bi-weekly bag-based collection program.

The collection options that include a mixed service level and the provision for a 46-80 litre organics cart are not identified in the contract as collection methods. An amendment to the

Townhouse Waste Collection Options

contract to allow these could be negotiated but would result in a significant increase in cost due to new vehicles and operators required to collect using these methods. The alternative collection options could be written into the next collection contract, which is expected to commence on October 1, 2024.

The existing cart supply contract does not allow for additional cart sizes to be manufactured outside of the designated carts (120L, 240L, 360L for garbage and recycling and 100L for organics). Staff would have to work with the cart vendor to amend the contract to implement a smaller organics cart.

Due to the anticipated high costs of renegotiating collection contracts and cart supply contracts, and due to the risk of producers not supporting changes to the blue box collection system under the new producer responsibility program, staff recommends implementing the townhouse conversion options listed above at the commencement of the next collection contract, which is anticipated to begin on October 1, 2024. Consultation and selection of options by townhouse complexes would, of course, occur sooner but collection would not change until 2024.

The future collection contract would specify the service level requirements at townhouse complexes, for the bidders' consideration in the submission of their bid prices, which staff believe would be more financially responsible than amending current contract pricing to address changes to the contract at this time.

As part of the Waste Collection Design Standards manual, any new townhouse complexes that are approved for development are now required to include storage for carts; up to 360 litres for garbage and recycling and 100 litres for organics. The Region will continue to work with the local municipalities as well as the developers to ensure that there is a designated area for waste collection carts.

Staff also recommend that any townhouse complexes requesting to be converted to cart-based collection with the three-cart program prior to the new collection contract in 2024 be allowed to do so, provided the proposed approach outlined in the Next Steps section of this report are met.

6. Next Steps

Consultation Plan

Following Council approval of the townhouse waste collection options, staff will implement a consultation plan to inform townhouse Boards of Directors and/or Property Managers of the waste collection service options and to confirm their preferred option.

The proposed process is as follows:

1. Board of Directors and/or Property Managers will be advised of Council's approval to move forward with one of the two options below:
 - Cart-based garbage and recycling collection with choice of 120, 240 and 360 litre carts with cart-based organics collection with choice of full sized 100 litre organics cart or 46-80 litre organics cart

Townhouse Waste Collection Options

- Cart-based garbage collection with choice of 120, 240 and 360 litre cart, bag-based recycling collection with cart-based organics collection with choice of the full sized 100 litre organics cart or 46-80 litre organics cart
- 2. Staff will clearly describe the benefits and impacts of each option, including the ability to transition sooner if the complex chooses cart-based garbage and recycling and the 100 litre organics cart.
- 3. Board of Directors and/or Property Managers can arrange an online review or in-person site visit to support selection of the option that best suits their needs and, subject to COVID-19 restrictions, may request staff to meet with residents should it be necessary.
- 4. Board of Directors and/or Property Managers will be required to confirm their selection in writing before September 2022. For complexes that do not make a selection before the deadline, staff will assess the complex and assign and implement a recommended option. Residents will be required to select cart sizes by December 31, 2022 to allow staff to adequately describe the scope of work in the upcoming cart supply contract and waste collection contracts.

Proposed Approach for Consultation for Townhouse Complexes Requesting Conversion before 2024

Staff has received requests from some townhouse complexes to implement the current three cart collection program. Staff recommend that townhouse complexes requesting to have all three carts – choice of 120 litres, 240 litres, or 360 litres for garbage and recycling carts and 100 litres organics cart – be approved for conversion prior to 2024 provided they meet the following requirements:

1. The Property Management Group for the complex must submit a written request on a prescribed form provided by staff.
2. The above written request must include written approval from the Board of Directors of the complex.

Once the written request is received, staff will advise the Ward Councillor that the conversion request has been submitted prior to converting the complex to the cart program.

7. Staffing

In order to ensure adequate staffing for the consultation and implementation process, it is recommended that one contract staff be added through the 2022 budget process to assist with the consultation process in 2022.

RISK CONSIDERATIONS

There is the risk that townhouse complexes that have already been converted could request to go back to bag-based collection, or one of the other approved options, which could reopen the debate amongst complex residents over whether to use carts or an alternative, and could increase costs. This risk will be managed by allowing these complexes to choose a smaller (46-80 litre) organics cart beginning in 2024.

Townhouse Waste Collection Options

FINANCIAL IMPACTS

Sufficient funding is available within existing approved budgets to fund the consultations and purchase of carts for the townhouse complexes that are requesting to be converted ahead of the new collection contracts in 2024.

One contract staff will be required to assist with the continuing consultation process in 2022. The request for this contract position will be submitted as part of the 2022 budget submission.

CONCLUSION

In response to Regional Council direction, staff has identified a number of waste collection options for townhouses that have not yet been converted to cart-based collection. These options address residents' concerns (primarily around storage space) and support the Region of Peel's strategic objectives. If approved by Council, these options will be implemented in 2024 under the Region's new collection contracts. Consultations with townhouse complex Boards of Directors and property managers will take place in 2022 to inform them of the available options and for them to select one of the options. Townhouse complexes that request conversion to the existing cart-based collection system prior to 2024 and meet the requirements set out in this report will be converted.

APPENDICES

Appendix I – Municipal Townhouse Collection Program Summary

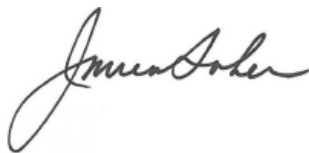
Appendix II – Evaluation of Collection Options for Garbage, Recycling and Organics

For further information regarding this report, please contact Norman Lee, Director Waste Management, Ext. 4703, norman.lee@peelregion.ca.

Reviewed and/or approved in workflow by:

Department Commissioner, Division Director and Financial Support Unit.

Final approval is by the Chief Administrative Officer.



J. Baker, Chief Administrative Officer

Appendix I: Municipal Townhouse Collection Program Summary

Table 1 - Municipal Townhouse Collection Program Summary

Municipality	Curbside Collection Method	Townhouse Collection Method
City of Toronto	Bi-weekly, cart-based collection for garbage and recycling and weekly organics in 100 litre carts (same size as Peel's new organics carts)	Bi-weekly cart-based collection for garbage and recycling and weekly organics in 100 litre carts Front End collection for garbage, recycling and organics for stacked townhouses
City of Guelph	Bi-weekly, cart-based collection for garbage and recycling and weekly organics in 80 litre carts.	Bi-weekly, cart-based collection for garbage and recycling and weekly organics in 80 litre carts for majority of townhouses Front End collection or bag-based collection where the collection vehicle cannot access each home
York Region	Bi-weekly bag-based collection for garbage, and weekly recycling in blue boxes and organics in 46 litre carts	Bi-weekly bag-based collection for garbage, and weekly recycling in blue boxes and organics in 46 litre carts for majority of townhouses Front-end collection where collection vehicles cannot access each home
Halton Region	Bi-weekly bag-based collection for garbage, and weekly recycling in blue boxes and organics in 46 litre carts	Bi-weekly cart-based collection for garbage and weekly blue boxes and organics in 46 litre carts for majority of townhouses Front-end collection where collection vehicles cannot access each home
City of Kingston	Weekly bag-based garbage, recycling in blue boxes and organics in 46 litre carts	Weekly bag-based garbage, recycling in blue and grey boxes and organics in 46 litre carts
Region of Waterloo	Bi-weekly bag-based collection for garbage, and weekly recycling in blue boxes and organics in 46 litre carts	Bi-weekly bag-based collection for garbage, and weekly recycling in blue boxes and organics in 46 litre carts Cart-based recycling collection where the collection vehicle cannot access each home
City of London	Weekly bag-based garbage and recycling in blue boxes	Varying frequency of bag-based garbage and recycling depending on size and availability of set out space

Appendix II: Evaluation of Garbage, Recycling and Organic Collection Options

Table 1 - Evaluation of Garbage Collection Options

	Increases Diversion	Addresses Resident Concerns	Reduces Litter	Prevents Vermin and Vector	Aligns with Potential User Fee
Carts	Based on data, cart-based collection results in higher waste diversion and lower contamination.	Option to select a small cart, which minimizes the footprint when combined with a small recycling cart and 46 to 80 litre organics cart.	Lidded carts reduce litter as bags may come untied or be ripped open by animals.	Lidded carts prevent vermin from accessing garbage in comparison to bags.	If user fees are based on the size of the garbage cart this option would align best with user fees.
Bags	Experience has demonstrated that residents are less likely to participate in organics collection.	Residents will not be required to store carts. Residents can carry bagged waste to the curb.	Bag-based programs can generate litter as bags may come untied or be ripped open by animals.	Residents on bag-based collection are likely to place food waste in garbage bags. This is known to attract rodents.	User fees could be based on bags (e.g. through the use of certified bags or bag tags).
Front End Containers	Does not increase diversion as it provides a convenient option for residents to place everything into one bag.	Poses spacing concerns in complexes where collection pads need to be built and may require containers to be placed next to an end unit and take away valuable parking spaces.	Front-end garbage containers are lidded and reduce litter.	This will further exaggerate the existing vector and vermin issue as residents leave garbage outside of the container.	User fees could be based on number of front-end containers.

Table 2 – Evaluation of Recycling Collection Options

	Increases Diversion	Addresses Resident Concerns	Reduces Litter	Prevents Vermin and Vector	Ability to transition to EPR	Aligns with Potential User Fee
Carts	Based on data, cart-based collection results in higher waste diversion and lower contamination.	Option to select a small cart, which minimizes the footprint when combined with a small recycling cart and 46 to 80 litre organics cart.	Lidded carts reduce litter as bags may come untied or be ripped open by animals.	Lidded carts prevent vermin from accessing unrinsed recyclables in comparison to bags.	Changes implemented from now to transition, may not be funded. Recycling carts are consistent with the current system and will be accepted.	Carts will allow residents to store more recyclable material and reduce the amount of garbage generated, affecting the user fee.
Bags	Based on data, bag-based collection results in lower waste diversion and greater contamination.	Residents will not be required to store carts. Residents can carry bagged waste to the curb.	Bag-based programs do not reduce litter as bags may come untied or be ripped open by animals.	Experience has shown that unrinsed containers in bags attract vermin and vectors.	Changes implemented from now to transition, may not be funded. Bagged recycling is consistent with the current system and will be accepted.	In order to participate in the recycling program, residents will be required to purchase recycling bags in addition to paying user fees.
Front End Containers	Does not increase diversion as it provides a convenient option for residents to place everything into one bag.	Front-end collection may pose spacing concerns in complexes where collection pads need to be built and may require containers to be placed next to an end unit and take away valuable parking spaces.	Front-end recycling containers are lidded and reduce litter.	This will further exaggerate the existing vector and vermin issue as residents leave garbage outside of the container.	Changes implemented from now to transition, may not be funded. Front end recycling is consistent with the current system and will be accepted.	A user fee on front end garbage containers will encourage property managers to work more closely with residents to increase participation in the recycling program.

Table 3 – Evaluation of Organics Collection Options

	Increases Diversion	Addresses Resident Concerns	Reduces Litter	Prevents Vermin and Vector	Aligns with Potential User Fee
100L cart	100 litre organics cart provides more capacity for resident to divert organics waste from the garbage.	Does not address resident's concerns regarding storage.	Lidded carts reduce litter.	Lidded organic carts also lock to further prevent vermin and other animals from accessing the material.	A user fee on garbage should encourage residents to effectively participate in the organics program. 100 litre carts will allow residents to store more material.
60-80L cart	60-80 litre organics cart provides some capacity for resident to divert organics waste from the garbage. Additional capacity will be needed once diapers and pet waste are added to the organics program.	This option address residents' concerns as it has a smaller footprint than the 100 litre cart.	Lidded carts reduce litter.	Lidded organic carts also lock to further prevent vermin and other animals from accessing the material.	A user fee on garbage should encourage residents to effectively participate in the organics program. 60 – 80 litre carts will allow residents to store some material.
46L cart	46 litre organics cart provides less capacity for resident to divert organics waste from the garbage. Additional capacity will be needed once diapers and pet waste are added to the organics program.	This option address residents' concerns as it has a smaller footprint than the 100 litre cart. Residents can carry the 46 litre cart to the curb.	Lidded carts reduce litter.	Lidded organic carts also lock to further prevent vermin and other animals from accessing the material.	A user fee on garbage should encourage residents to effectively participate in the organics program. A 46 litre cart may not provide enough capacity for residents.
Front End Containers	Based on past pilot programs, front- end organics collection in a multi-residential setting results in low diversion rate and high contamination rates.	Front-end collection may pose spacing concerns in complexes where collection pads need to be built and may require containers to be placed next to an end unit and take away valuable parking spaces.	Front-end organic containers are lidded and reduce litter.	Although lidded, there are many access points for vermin. This will further exaggerate the existing vector and vermin issue as residents leave garbage outside of the container.	A user fee on front end garbage containers will encourage property managers to work more closely with residents to increase participation in the organics program.

REPORT TITLE: **Peel's Comments on the Provincial Proposal to Amend the Food and Organic Waste Policy Statement**

FROM: Andrea Warren, Interim Commissioner of Public Works

RECOMMENDATION

That the comments outlined in the report of the Interim Commissioner of Public Works titled "Peel's Comments on the Provincial Proposal to Amend the Food and Organic Waste Policy Statement" be endorsed.

REPORT HIGHLIGHTS

- On April 30, 2018, the Ministry of the Environment, Conservation and Parks (the Ministry) issued the Food and Organic Waste Policy Statement under section 11 of the *Resource Recovery and Circular Economy Act, 2016*.
- On September 30, 2020 the Ministry posted a proposal to amend the Food and Organic Waste Policy Statement for review, with comments due by November 14, 2020.
- Staff supports many of the provisions of the proposal; however, does not support the proposal that source separated organics collection programs (including municipal green bin programs) should accept certified compostable pods and other items.
- Staff recommends an evidence-based, multi-pronged approach for the management of compostable products including provincial (or national) certification standards, designation under the new Blue Box producer responsibility regulations, and pilot programs between producers, municipalities and manufacturers.
- The comments included in Appendix I of this report were submitted to the Ministry to meet the deadline, with the provision that the comments were subject to Council approval.
- Staff will continue to participate in consultations related to the Food and Organic Waste Policy Statement and provide updates to Regional Council.

DISCUSSION

1. Background

In April 2018, the Ministry of the Environment, Conservation and Parks issued the Food and Organic Waste Policy Statement under section 11 of the *Resource Recovery and Circular Economy Act, 2016*. Staff provided the Waste Management Strategic Advisory Committee with an overview of the Policy Statement including targets in early 2019 (Resolution 2019-197). In September 2020, the Ministry posted a proposal to amend the Policy Statement with comments due by November 14, 2020. The amendments aim to clarify and expand the categories of food and organic waste as well as update the direction on the management of compostable products and packaging.

Peel's Comments on the Provincial Proposal to Amend the Food and Organic Waste Policy Statement

2. Comments on the Proposal to Amend the Food and Organic Waste Policy Statement

Staff worked closely with the Association of Municipalities of Ontario, City of Toronto, Regional Public Works Commissioners of Ontario, and the Municipal Waste Association on their joint submission and showed support in Peel's comments.

Overall, staff is generally supportive of most of the proposed amendments, including efforts to meet targets beyond the stated 2023 and 2025 targets; innovation in new processing technologies; and pilot studies on proper management of compostable products.

Staff, however, is not supportive of the proposal that municipal source separated organics collection programs should accept certified compostable products and packaging such as pods. This is an area of concern, as many items labelled as compostable would not meet rigorous testing and strictly applied standards. Therefore, these materials do not fully break down in composting systems (Peel's existing system), or anaerobic digestion systems (Peel's future system).

Accepting compostable products and packaging in the green bin would require significant new capital and operating expenses to ensure the products and packaging are fully composted or, alternatively, removed as residue. Preliminary cost estimates are in the millions, however, staff is investigating in more detail to determine budget impacts. In Peel's case, it is necessary to estimate the impact of compostable products and packaging in the Region's current composting system and in its future anaerobic digestion system. Further, if communication campaigns are confusing or ineffective, compostable products and packaging could contaminate both the green bin and blue box streams due to consumer confusion.

Staff instead recommended that the province adopt an evidence-based, multi-pronged approach for the management of compostable products and packaging including:

- Development of an acceptable provincial certification standard and potentially a national standard.
- Designation of compostable products and packaging under the new Blue Box regulation under the *Resource Recovery and Circular Economy Act (2016)* complete with collection and management targets to ensure producers are responsible for the end of life management of any compostable products and packaging they introduce into the marketplace.
- Encourage pilot programs between producers, municipalities and the manufacturers of compostable products and packaging.

Staff also provided comments recommending that the province:

- Support and encourage producer funded innovation in new processing capacity.
- Develop detailed provincial guidance materials.

Comments on specific parts of the proposal to amend the Food and Organic Waste Policy Statement are included in Appendix I of this report.

Peel's Comments on the Provincial Proposal to Amend the Food and Organic Waste Policy Statement

Staff submitted the appended comments to the Ministry by the deadline of November 14, 2020 with the provision that these were subject to Council approval.

RISK CONSIDERATIONS

The proposed changes to the Food and Organic Waste Policy Statement present the following risks to Peel:

- It could significantly increase processing costs for the entire organics stream.
- It could result in greater levels of contamination of both the green bin and blue box streams due to consumer confusion and lack of standardization amongst compostable products and packaging and non-compostable like items.
- It could decrease in the value and quality of Peel's compost from the presence of uncomposted products or packaging in the finished compost.
- It could lead to resident frustration if compostable items cannot be processed and are sent for disposal as residue.
- It could require additional support from by-law enforcement and public outreach to eliminate contaminants in the green bin resulting from resident confusion over acceptable materials.

To mitigate these risks, staff will continue to engage with the Ministry of the Environment, Conservation and Parks to push for:

- Inclusion of compostable products as a designated material in the new Blue Box Regulation under the *Resource Recovery and Circular Economy Act (2016)*, making Producers of compostable products to be fully responsible.
- Labelling that clearly identifies how to properly dispose of compostable products and packaging.
- Development of provincial or national certification standard.

FINANCIAL IMPLICATIONS

There are no immediate financial implications resulting from this report.

CONCLUSION

Staff reviewed the proposal to amend the Food and Organic Waste Policy Statement and submitted comments to the Ministry of the Environment, Conservation and Parks by the November 14, 2020 deadline, with the provision that the comments were subject to Council approval.

Staff will continue to participate in consultations related to the Food and Organic Waste Policy Statement to advocate for outcomes that support Peel residents and businesses.

Peel's Comments on the Provincial Proposal to Amend the Food and Organic Waste Policy Statement

APPENDICES

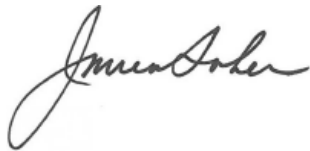
Appendix I – Food and Organic Waste Policy Statement Comments Submitted on November 13, 2020

For further information regarding this report, please contact Norman Lee, Director Waste Management, Ext. 4703, norman.lee@peelregion.ca.

Reviewed and/or approved in workflow by:

Department Commissioner, Division Director and Financial Support Unit.

Final approval is by the Chief Administrative Officer.

A handwritten signature in black ink, appearing to read "J. Baker", is positioned above a horizontal line.

J. Baker, Chief Administrative Officer



November 13, 2020

Atif Durrani
Manager, Policy Development
Ministry of the Environment, Conservation and Parks
Atif.durrani@ontario.ca

RE: ERO Number 019-2498: Proposal to amend the Food and Organic Waste Policy Statement

Dear Mr. Durrani:

The Region of Peel (Region) appreciates the opportunity to provide comments on the proposal to amend the Food and Organic Waste Policy Statement. The Region's comments are in line with and in support of the comments jointly submitted by the Association of Municipalities of Ontario, City of Toronto, Regional Public Works Commissioners of Ontario and the Municipal Waste Association.

1. The Region of Peel does not support the revised direction that source separated organics collection programs "should" accept "certified" compostable pods and bags

The Region shares the government's goals in the Food and Organic Waste Policy Statement to improve the management of food and organic waste. However, we do not support the proposal's revised direction from 'encouraged' to 'should' for municipal source separated organic collection programs to accept certified compostable coffee pods and bags.

The number of products and packaging for consumer goods labelled as compostable has increased with many inadvertently placed into our green bin program. Unfortunately, many of these items do not breakdown in composting or anaerobic digestion systems as actual organic processing capabilities do not currently match the process to certify these products for composting.

In addition, it is important to recognize that compostable products and packaging make up a small fraction of the organic waste stream; less than 0.2% of the total waste stream in Peel. Accepting this small amount of material in the green bin would, however, require significant operating and capital expenses. To be clear, the inclusion of compostable products and packaging has the potential to:

- Significantly increase processing costs for the entire organics stream with minimal benefit
- Lead to contamination in both the green bin and blue box streams due to consumer confusion and lack of standardization amongst compostable products and packaging and non-compostable like items
- Lead to additional contamination issues which could impact the value of the end product
 - The Region's current end markets are primarily (75%) to the agricultural sector where compost is applied to agricultural land.

Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Peel's main third party processor, AllTreat Farms, markets the remaining 25% of the compost in bags through retail channels for residential use.

- The addition of non-nutrient material (e.g. bio-plastics) to the feedstock could accumulate on a long-term basis on farmland and eventually in the food system
- End markets may eventually move away from procuring our compost
- Send the wrong message to the public if the items cannot be processed and end up being sent to disposal as residue
 - This would require additional support from bylaw enforcement and public outreach to eliminate contaminants in the green bin resulting from resident confusion over acceptable materials.

2. The Region recommends an evidence-based, multi-pronged approach for the management of compostable products and packaging such as pods and bags

The Region and other municipalities have a shared goal, and proven track record, of increasing opportunities for Ontario residents to divert waste. The approach undertaken should, however, consider and ensure improved environmental outcomes including enhanced recovery of already accepted organics to yield greater diversion. Ultimately, the Region seeks to avoid the potential of increased contamination or a situation where compostable products and packaging cannot be properly processed and are instead sent to disposal.

Moving forward, the Region recommends the three-fold approach developed by the Ministry of the Environment, Conservation and Parks led Compostable Products Technical Working:

- Develop and agree on an acceptable provincial certification standard for compostable products and packaging, including the potential to support the development of a national standard
- Designate and obligate collection and management of compostable products and packaging exclusively in the new Blue Box Regulation under the Resource Recovery and Circular Economy Act (2016) to ensure producers are responsible for their proper management
 - Addressing compostable products and packaging through two policy measures (Policy Statement and Blue Box Regulation) could cause responsibility confusion and potentially lead to unintended consequences such as increased contamination in two diversion streams: green bin and blue box
- Encourage pilot programs between producers, municipalities and the manufacturers of compostable products and packaging
 - The Province has a critical role to play in the development of standards, ensuring results are based on real world processing capabilities, have broad agreement from all stakeholders and are aligned with developments at the national level
 - It should be highlighted that these types of pilots can be resource intensive as they impact regular operation of busy facilities.



Accordingly, it is the Region's expectation that on-site research pilots would be funded by the producers and manufacturers of compostable products and packaging.

As noted above, the Region strongly supports this three-fold approach and does not support measures that would ultimately force the public sector to make costly changes to their systems based on product and packaging design and marketing decisions of multinational companies. The Region, along with other municipalities, holds as an important value the transparency to the public on the actual way these materials are managed. In that regard, the Region supports the inclusion of language and/or requirements in the Policy Statement that ensures clear information on the proper disposal of compostable products and packaging is available for consumers at the point of purchase.

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10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

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3. The Province should support and encourage Producer funded innovation in new processing capacity and to process compostable packaging and products

The Region respects the inclusion of a direction to encourage existing source separated organics operators and new source separated organics processing capacity to consider the ability to process compostable packaging and products as a reasonable addition to the Policy Statement. This type of consideration is something municipal governments undertake on a regular basis.

4. Development of detailed provincial guidance materials are required

Although not included in these amendments, the Region recommends that the Province produce additional guidance materials with details and examples for stakeholders regarding the Food and Organic Waste Policy Statement such as:

- How targets will be calculated and measured
- Further clarification on which businesses and entities are obligated to meet targets
- Data and record-keeping expectations

Thank you for the opportunity to comment on the proposed amendments to Ontario's Food and Organic Waste Policy Statement. The Region looks forward to further dialogue with the Province and other stakeholders on improving the management of food and organic waste.

Sincerely,

Norman Lee
Director, Waste Management
905-791-7800 extn. 4703
norman.lee@peelregion.ca

CC: Isaac Apter, Director of Policy, Ministry of the Environment, Conservation and Parks, isaac.apter@ontario.ca

REPORT TITLE: **Peel's Comments on the Federal Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution**

FROM: Andrea Warren, Interim Commissioner of Public Works

RECOMMENDATION

That the comments outlined in the report of the Interim Commissioner of Public Works titled "Peel's Comments on the Federal Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution", be endorsed.

REPORT HIGHLIGHTS

- On October 7, 2020, Environment and Climate Change Canada released the "Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution" for review with comments due by December 9, 2020.
- On October 22, 2020 Regional Council adopted a motion in support of the federal proposal to ban harmful single-use plastic items in 2021.
- Staff is generally supportive of the proposed approach as it is a necessary step towards zero plastic waste and a circular economy and aligns with the objectives of Peel's long-term waste management strategy.
- The comments included in Appendix I of this report were submitted to Environment and Climate Change Canada to meet the deadline, with the provision that the comments were subject to Council endorsement.
- Staff will continue to participate in federal consultations related to the reduction of plastic waste and provide updates to Regional Council as appropriate.

DISCUSSION

1. Background

In 2018, the federal government signaled its intent to move towards a more sustainable approach to producing, using, and managing plastics in Canada. It signed the Ocean Plastics Charter in June 2018 and approved the Canada-wide Strategy on Zero Plastic Waste in November 2018.

On June 28, 2018 Regional Council adopted a motion requesting the federal government to develop a national strategy that addresses plastic pollution (Resolution 2018-630).

On October 7, 2020 Environment and Climate Change Canada released the "Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution" for review with comments due by December 9, 2020.

Peel's Comments on the Federal Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution

The discussion paper identifies the following next steps towards achieving Zero Plastic Waste:

- Proposed addition of “plastic manufactured items” to Schedule 1 of the *Canadian Environmental Protection Act, 1999*;
- Manage single-use plastics by banning or restricting harmful items as early as 2021;
- Establishing minimum recycled content requirements; and
- Ensuring end of life responsibility by improving and expanding extended producer responsibility in Canada.

On October 22, 2020 Regional Council adopted a motion in support of the federal proposal to ban harmful single-use plastic items in 2021 and directed staff to submit comments by the deadline to Environment and Climate Change Canada (Resolution 2020-869).

2. Comments on the Proposed Integrated Management Approach to Plastic Products

Staff reviewed the “Proposed Integrated Management Approach to Plastic Products to prevent Waste and Pollution” and participated in consultations related to the proposed approach prior to submitting comments to Environment and Climate Change Canada.

Staff is supportive of the proposed approach as it is a necessary step towards zero plastic waste and a circular economy and aligns with the objectives of Peel's long-term waste management strategy. Staff provided recommendations to support the following aspects of the proposed approach:

- Use of an evidence-based management framework to identify harmful plastic products.
- Bans of harmful single-use products including plastic checkout bags, stir sticks, six-pack rings, cutlery, straws, food service ware made from problematic plastics.
- Development of minimum recycled content targets.
- Consideration of a national extended producer responsibility framework.

Staff, however, does not support the consideration of compostable or biodegradable plastics as alternatives to single-use plastic products until proven composting technologies are available for such items and producer responsibility programs are in place for such items. Staff recommended the development of national standards for compostable and biodegradable products and the promotion of reusable or recyclable products as alternatives.

Comments on specific parts of the proposed integrated approach to the management of plastic products are included in Appendix I of this report.

Staff submitted the appended comments to Environment and Climate Change Canada by the deadline of December 9, 2020 with the provision that these were subject to Council approval.

Peel's Comments on the Federal Discussion Paper: Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution

RISK CONSIDERATIONS

The proposed approach on the management of plastics presents the following risk to Peel:

- Some compostable and biodegradable plastic products may not be compatible with Peel's organics processing systems and would end up as residue negating the benefits of the ban on single-use plastic items. Further, expanding the number of compostable and biodegradable products and packages in the marketplace could increase Peel's processing costs, contamination levels in both the green bin and blue box and decrease the value of Peel's compost. To mitigate these risks, staff will continue to engage with the federal government to advocate for national certification standards for compostable and biodegradable plastic products, and their end of life management.

FINANCIAL IMPLICATIONS

There are no immediate financial implications resulting from this report.

CONCLUSION

Staff reviewed the "Discussion Paper: Proposed Integrated Approach to Management of Plastic Products to Prevent Waste and Pollution" and submitted comments to Environment and Climate Change Canada by the December 9, 2020 deadline, with the provision that the comments were subject to Council endorsement.

Staff will continue to participate in federal consultations related to the reduction of plastic waste and provide updates to Regional Council.

APPENDICES

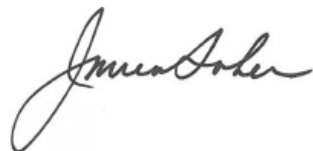
Appendix I – Peel's Comments - Proposed Integrated Management Approach Submitted on December 8, 2020

For further information regarding this report, please contact Norman Lee, Director Waste Management, Ext. 4703, norman.lee@peelregion.ca.

Reviewed and/or approved in workflow by:

Department Commissioner, Division Director and Financial Support Unit.

Final approval is by the Chief Administrative Officer.



J. Baker, Chief Administrative Officer



Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

December 8, 2020

Dany Drouin
Director General
Plastics and Waste Management Directorate
Environment and Climate Change Canada
351, boul. Saint-Joseph, 9th Floor
Gatineau, Quebec K1A 0H3

Re: Discussion Paper on a Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution

Dear Mr. Drouin:

The Region of Peel welcomes the federal government's commitment to prioritize the reduction of plastic pollution and appreciates the opportunity to provide comments on the Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution. The comments attached to this letter are provided by the Region as input into the development of the proposed approach.

The Region is interested in continuing to engage with the federal government as it finalizes the integrated management approach to plastic products and welcomes opportunities for ongoing dialogue.

Sincerely,

Norm Lee
Director, Waste Management
Region of Peel
T: 905-791-7800 ext. 4703
E: norman.lee@peelregion.ca



Proposed Integrated Management Approach to Plastic Products

**Submission to Environment and Climate Change Canada
on a Proposed Integrated Management Approach to Plastic Products to
Prevent Waste and Pollution**

Regional Municipality of Peel

December 8, 2020

The Region of Peel appreciates the opportunity to provide feedback on the Discussion Paper: a proposed integrated management approach to plastic products to prevent waste and pollution, and is pleased to continue to be an engaged stakeholder in the implementation of the *Strategy on Zero Plastic Waste (2018)* and transition to a circular economy where reduction, reuse, and repair are prioritized and materials stay in the economy and out of landfills and the environment.

In general, the Region of Peel welcomes the overall intent of the proposed integrated management approach to plastic products, as collective action is a necessary and important step towards zero plastic waste and a circular economy. The following comments and constructive suggestions are submitted for your consideration as you develop the integrated management approach to plastic products. These comments will be presented to Peel's Regional Council for endorsement and if there any amendments to these comments made by Council, they will be forwarded to you as soon as possible.

Proposed Management Framework for Plastics

The Region of Peel (Region) has established and implemented programs to reduce waste generation and increase resource recovery. However, one of the most significant challenges that we face today is the recycling of plastic and plastic composite products and packaging. Plastic products and packaging are becoming more difficult to manage at the end-of-life. To make matters worse, messages from manufacturers and producers often confuse consumers about the recyclability of their products and packaging resulting in municipalities carrying the costs of managing these materials in their waste streams.

The Region is pleased that the federal government is taking an evidence-based structured approach to reduce plastic waste and keep it out of the environment. In finalizing the proposed management framework, the Region recommends including consideration of:

- Availability and sustainability of end-markets.
- Environmental footprint of existing or innovative alternatives.
- Quantity of products and packaging being generated and prioritizing products and packaging that have the highest quantities.
- Whether the costs of monitoring, enforcement and market development are proportional to the benefits of a ban or restriction of a plastic product or packaging.

- Refining the definitions of recyclable, compostable, and biodegradable based on municipal processing capabilities that are in practice and at scale.

Compostable and Biodegradable Alternatives for Single-Use Products

The Region does not support the consideration of compostable or biodegradable plastics as alternatives to single-use plastic products until proven technologies are in place to compost them and producer responsibility programs are in place to fund their end of life management. These items are not compatible with existing composting infrastructure; they add unnecessary and significant costs to municipal composting programs; and can degrade the value and quality of produced or recovered materials.

Encouraging the use of compostable or biodegradable products as an alternative or as an exemption for single-use plastic products does not address the root causes of plastic pollution; rather it merely replaces one form of disposable product for another. The federal government should promote the use of reusable or recyclable products as alternatives to single-use plastic products.

If compostable or biodegradable alternatives are in fact the best evidence based option for a particular single-use plastic product, it is imperative that the conditions under which the item is compostable or biodegradable (industrial or home composting) are clearly and legibly written on the packaging or in a document accompanying the item. The Region urges the development of national standards or a certification program for compostable and biodegradable products and packaging that is in line with municipal processing capabilities in practice and at scale. Further, the federal government should invest in waste management infrastructure to ensure consistency and capacity for municipal governments to accept more of these types of materials.

Single-Use Plastic Bans

The Region supports the proposal to ban harmful single-use plastic items, and not through a phased in approach, including plastic checkout bags, stir sticks, six-pack rings, cutlery, straws, food service ware made from problematic plastics. The Region recommends consultation on any future bans.

The Region understands the need to accommodate accessibility through exemptions and recommends that exemptions within the framework be subject to time limitations enabling the review of any new available alternatives or innovations.

Recycled Content

The Region supports the development of minimum recycled content targets as it signals a commitment to promoting recycling, improving quality and efficiency, and increasing capacity by stimulating increased investment in recycling infrastructure while reducing the use of primary raw materials.

As one of the largest municipal recyclers in Ontario, the Region appreciates the importance of a viable end-market for recyclable materials and is encouraged by the proposal of minimum recycled content targets for plastic products. The driver needs to be the optimization of the value of recycled materials through clean high value material streams in order to ensure market demand for collected materials. The federal government should:

- Set high and enforceable minimum recycled content targets by resin type (PET, HDPE, PVC, LDPE, PP, PS) that are ever increasing until the product is made of 100% recycled content.
- Set minimum recycled content targets at each stage of the plastics life cycle encouraging circular design, improved collection and recycling systems, and expanded markets for recycled materials.
- Consult with industry stakeholders to establish the best minimum recycled content target to make a meaningful impact on secondary markets.
- Develop a monitoring and enforcement system to verify compliance and ensure manufacturers are integrating recycled content into their new plastic products and packaging.

Procurement is a strong stimulus to the growth of domestic end-markets. Government procurement of recycled content will play a key role in the ability to reach targets. The Region recommends establishing a circular procurement community of practice to enable all levels of government to include recycled content considerations as part of their procurement practices.

Further, it is important to note that recycled content targets are one piece of the puzzle. The federal government should consider how consumer behaviour, collection and recycling infrastructure, and business model redesign (i.e. service, sharing, reuse) play a role in the solution.

Extended Producer Responsibility

The Region is a strong proponent of extended producer responsibility (EPR) and has advocated for the implementation of EPR provincially and nationally. Central to the proposed integrated management approach should be the implementation of a national harmonized EPR framework with a focus on individual producer responsibility. This is essential to deliver the investment that is needed in the current recycling infrastructure to grow the quality and value of recycled materials and incentivize the use of recycled content in plastics products and packaging.

The Region's experience in the transition and implementation of EPR in Ontario has revealed the need for a more comprehensive approach. To ensure EPR systems are comprehensive, consistent and transparent, the federal government should provide guidelines or principles on the following:

- Designation of a broad range of materials including compostable and biodegradable products and packaging. Consideration should also be given to designating durable bulky plastics such as toys, kiddie pools and baskets which are extensively found in municipal systems and difficult to manage.
- Inclusion of Industrial, Commercial and Institutional (IC&I) and other sources, such as long-term care facilities, childcare facilities, public spaces, schools, parks, and municipal buildings (community centres, libraries) that generate similar materials to residences.
- Establishment of aggressive collection and management targets that increase progressively over time.
- Continued improvement of services through accessibility standards and provisions to expand accessibility and ensure increase in service levels.
- Implementation of a robust monitoring and enforcement system to ensure compliance including the creation of an oversight body and development of administrative penalties.
- Flexibility to adapt to local conditions.

Canada's Leadership Role to Reduce Plastic Waste

To make a circular economy a reality in Canada, the federal government should take bold action, invest in infrastructure and innovation, and meaningfully engage with all stakeholders through collaborative forums.

The federal government can show leadership in this regard by:

- Establishing and enforcing high targets for the reduction of virgin plastics, reuse, recycling, and recycled content both for the manufacturing of domestic and exported plastic products to support Canada's transition to a circular economy.
- Setting deadlines for the implementation of EPR in provinces and territories that have not yet introduced an EPR a system.
- Considering final direction taken with the integrated management approach as the minimum bar and reviewing the approach regularly, in consultation with stakeholders, to progressively increase targets.

The Region of Peel would like to see the Government of Canada lead the way, commit to a circular economy, and set an example for other countries to follow. We are prepared to work collaboratively with Environment and Climate Change Canada, the Plastics and Waste Management Directorate, and other stakeholders as we continue to support the federal government's efforts to keep plastic within the economy and out of disposal and the environment.

For any questions regarding the Region's submission or for more information, please contact:

Norman Lee
Director, Waste Management
Public Works
Region of Peel
Norman.lee@peelregion.ca