



**IC&I Sector Consultation Session To Discuss
Options to Achieve 60% Diversion of Waste In Ontario**

Report to

Ministry of Environment

May, 2005

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Executive Summary

Kelleher Environmental was contracted in April 2005 to hold a consultation session with selected representatives of the IC&I sector, to explore their assessment of the options currently under consideration for diversion of 60% of waste in Ontario, and to collect additional feedback on potential elements of the 60% diversion strategy for IC&I and C&D waste.

A half-day meeting was held on 27th April, 2005 (10:00am to 2:00pm) at the Ministry offices at 40 St Clair Avenue West, Toronto and was attended by 18 IC&I sector representatives, and 7 representatives from the Ministries of Economic Development and Trade (2), Ministry of Energy (1) and Ministry of Environment (4). The meeting was facilitated by Betty Muise, a professional facilitator, and Maria Kelleher was the note-taker.

A presentation was made describing various IC&I waste diversion options under consideration by the Ministry at this time. Participants were asked for their input on the following questions:

- Which of the measures presented would enhance their current or future waste diversion efforts (how would the proposed measures affect them);
- What was their assessment of the key impacts of the proposed measures
- Provide suggestions on reporting and enforcement
- Identify the two most important impacts and issues they would like the MOE to consider in their future plans

Key messages from participants were:

- **Need for flexible, non-prescriptive 3Rs regulations:** The need for the MOE to write flexible regulations which are not prescriptive but allow companies to meet the Ministry objectives using their own innovation and creativity. Companies want to respond to regulations in a way which makes sense in their own operations. Their suggestion was not to mandate source separation of specific materials, but to set a target and allow companies flexibility in how they meet the target.
- **Resistance to mandatory source separation of specific materials:** Participants felt that the current regulations are too prescriptive; they require source separation of some materials which do not achieve much diversion, but are costly and inefficient to source separate. Much higher diversion can be achieved by giving companies freedom to choose what materials they source separate.
- **Enforcement of 3Rs regulations is essential:** Participants stated that enforcement is essential to create a level playing field so that all companies realize they have to comply with the 3Rs regulations. Enforcement will also contribute to Ontario achieving its 60% diversion target.

- **Baseline data needs to be developed:** Participants identified the lack of baseline data on waste quantities and waste composition currently generated by different types of businesses in Ontario as a key barrier to developing a practical strategy to divert 60% of our IC&I and C&D waste. Various suggestions were made on how baseline data could be collected. The baseline data would then form a good starting point from which a practical 60% diversion plan could be developed and 60% diversion could be measured.
- **Leaders are disadvantaged with current diversion reporting method:** Significant concern was expressed that companies who are leaders, and have already significantly reduced the waste they generate through source reduction and reuse will not be given credit for these efforts with the current method of measuring waste diversion. An alternative measurement approach was suggested which fully takes account of source reduction and reuse and recognizes the efforts of industry leaders. Companies could be given two options on how to report progress towards 60% diversion; either describe what they have done historically, and provide documentation on the diversion they have achieved, or report diversion on a current flow basis.
- **Historical waste reduction efforts must be recognized:** It was stressed that a method needs to be identified which will fully credit and account for previous efforts by companies to reduce waste. The GAP method which is used to report a diversion percentage measures diversion on a “current flow “basis, but does not compare current waste reduction performance with historical waste management practices. This method is a disadvantage for companies who have made improvements in the past.
- **Education, awareness and training are all essential, and associations can play a key role:** Education, awareness and training were considered essential to the success of whatever 60% strategy is chosen. Many companies are not aware of the current 3Rs regulations, therefore a new campaign is needed to raise awareness. Industry associations were considered the best partners to communicate to a large number of businesses throughout Ontario about the regulations and the 60% diversion objective. It was also suggested that industry associations would be the best partners to document and share best practices in waste diversion among different members of the same industry, who would all face similar challenges
- **A reduction in the waste disposed must be measured:** The most important statistic is that the waste landfilled should decrease over time. If a company reports the amount landfilled or disposed over time as tonnes/year, tonnes/employee or tonnes/capita, and this statistic is getting smaller over time, then the objective of waste reduction has been met.

1. Introduction and Background

The provincial government has set a goal of diverting 60% of Ontario's waste from disposal, up from the current diversion rate of 28%.

The Ministry of Environment released a Discussion Paper on June 10, 2004 that explored options for the diversion of 60-percent of waste from the residential, industrial, commercial, institutional, construction and demolition sectors from disposal. The purpose of the Discussion Paper was to seek input from stakeholders and the public on ways to help Ontario reach its waste diversion goal.

In addition to posting the discussion paper on the Environmental Registry, the Ministry held a number of consultation sessions with the public and key stakeholders throughout the province in June, 2004. The consultation sessions were supplemented with three strategy development processes to focus on composting, financing and diversion of IC&I and C&D waste. Kelleher Environmental was contracted to assist the Ministry with the financing and IC&I strategies and prepared two reports for the Ministry in August, 2004 summarizing the results of further consultation and research in these two areas.

Since that time, Ministry staff have carried out additional research and analysis on options to increase diversion of IC&I waste. Kelleher Environmental was contracted in April 2005 to hold a consultation session with selected representatives of the IC&I sector, to explore their assessment of the options currently under consideration, and collect additional feedback on the IC&I strategy. This report summarizes the discussions which took place at the half-day meeting which was held on 27th April, 2005 (10:00am to 2:00pm) at the Ministry offices at 40 St Clair Avenue West, Toronto.

2. Workshop Planning and Agenda Design

2.1 Representation at Workshop

Two key groups will be impacted by any increased IC&I waste diversion in Ontario:

- **Waste generators: Individual businesses or buildings** who will have to comply with any future diversion requirements and
- **Waste collection service providers** (private sector waste management companies and municipalities who provide IC&I collection service).

A list of invitees was developed in consultation with Ministry staff to include representation from the following sectors:

- Large companies currently regulated;
- Companies who are leaders (e.g. Fairmont Hotels, Interface Flooring, etc.);
- Associations who represent currently regulated businesses, and
- Associations who represent small and medium sized companies¹ in currently regulated sectors, who could be impacted or regulated.

2.2 Meeting Agenda Design

A number of meetings were held with Ministry staff to decide on the topics to be discussed and different methods to engage the stakeholders. The topics on which the Ministry needed more input were:

- Modify existing 3Rs regulations
 - Modify source separation requirements
 - Target large volume materials
 - Delete materials which are not practical to recycle and result in minimum diversion
- Expand existing 3Rs regulations
 - add more sectors
 - expand the range of companies included among currently regulated sectors.
 - add more materials;
 - add materials to be consistent with Michigan requirements;
- Material specific strategies
 - Ban recyclables from transfer stations and landfills;
- Reporting For Existing 3Rs Regulations
- Enforcement of Existing 3Rs Regulations.

¹ It was considered appropriate to represent small and medium sized companies through associations rather than individual companies who can not represent the whole sector

It was decided that a one half-day consultation session was the most practical for private sector IC&I representatives. Because of the short time for the meeting, it was agreed that one large group discussion, rather than small break out groups was the most effective way to use the time available.

Various agenda designs were considered; the final agenda for the half day workshop is presented in Table 1.

Table 1
Agenda for 27th April, 2005 Workshop

10:00 to 10:40	Welcome, Introductions, Workshop Objective, Agenda and Format and IC&I Diversion Success Stories
10:40 to 11:20	MOE Presentation: IC&I Proposals and Potential Options to Help Ontario Achieve 60% Diversion
11:20 to 12:00	Question # 1: Which of these measures can/will enhance your current and future efforts?
11:50-12:20	LUNCH
12:20 to 12:50	Question #2: What are the key impacts of the proposed measures?
12:50 to 1:30	Question #3: Recommendations on Reporting and Enforcement
1:30 to 2:00	Question #4: What are the two most important issues and impacts that you would like the MOE to consider in their future plans?
2:00	Closing Remarks and Next Steps

2.3 Invitation Process

Invitations were sent by fax to potential participants on 15th April, 2005. The invitation package included:

- A short introductory invitation from P.K. Misra, Director of the Waste Management Policy Branch
- The preliminary agenda for the workshop.

Participants were asked to RSVP by phone or e-mail.

Those who had not responded by April 22nd were contacted by phone or e-mail to confirm whether they were attending or sending a substitute.

2.4 Workshop Attendees

The workshop attendees are listed in Table 2.

Table 2
Attendees at 27th April, 2005 Ministry of Environment Workshop

Name	Affiliation	Sector
Shaun Aurora	Ministry of Energy	Ontario Government
Wayne Banting	Cadillac Fairview	Office and Retail C&D
Jason Chambers	IKEA Canada	Retail
Tom Charette	Canadian Federation of Independent Business	Small and medium sized businesses
Cathy Cirko	Environment and Plastics Industry Council	Manufacturing
Nancy Coulis	Canadian Manufacturers and Exporters	Manufacturing
Rob Cook	Ontario Waste Management Association	Waste management service to IC&I sector
Nicola Crawhall	Ministry of Environment	Ontario Government
Melanie Currie	Canadian Federation of Independent Business	Small and medium sized businesses
Mary Anne Ferry	Toyota Canada Inc	Manufacturing
Brian Forrestal	Waste Services Inc	Waste management service to IC&I sector
Karen Frizzell	Canadian Vehicle Manufacturers Association	Manufacturing
Christina Fung	Ford Motor Company of Canada	Manufacturing
Ashley Mc Clinton	Retail Council of Canada	Retail
Ian Mac Donald	Kimberley Clarke	Manufacturing
Kim Mc Kinnon	Canadian Council of Grocery Distributors	Retail
P.K Misra	Ministry of Environment	Ontario Government
Dave Reid	Ministry of Economic Development and Trade	Ontario Government
Bob Sawatsky	Renova Consultants	Construction and Demolition
Michelle Saunders	Ontario Restaurant, Hotel and Motel Association	Restaurants Hotel and Motel
Jocelyn Schaeffer	Ministry of Economic Development and Trade	Ontario Government
Vincent Sferrazza	Ministry of Environment	Ontario Government
Chuck Stradling	BOMA (Building Owners and Managers Association)	Office, Retail, Multi-Family Housing and C&D
John Taylor	Ministry of Environment	Ontario Government
Michelle White	Fairmont Hotels and Resorts	Hotel
Yannick Lemaire	Air Canada Centre	Entertainment
Betty Muise	Kelleher Environmental	Facilitator
Maria Kelleher	Kelleher Environmental	Note Taker

3. Workshop Feedback

3.1 MOE Presentation On Options

A number of questions of clarification were raised. Participants were interested in the timing of next steps, and requested sufficient time to respond.

3.2 Question #1: Which of these measures can or will enhance your current and future efforts

Participants felt that none of the measures currently proposed would enhance the current and future efforts of most of the workshop participants, as they are leaders who are already well beyond 60% diversion. Suggestions on implementing the regulations for **other generators** were discussed. For the leaders, there are smaller potential gains from any new measures. A concern was expressed about how the 60% diversion target will be measured; and what baseline it would be measured against.

To illustrate the concern of participants, an example is presented in the table below.

	Company A	Company B
Waste disposed in 1995	10,000 tonnes	10,000 tonnes
Reduction in waste generated through innovation, source reduction and reuse	9,000 tonnes	0 tonnes
Waste produced in 2005	1,000 tonnes	10,000 tonnes
Real reduction in waste generation	90%	0%
Waste recycled	200 tonnes	6,000 tonnes
Waste to disposal	800 tonnes	4,000 tonnes
GAP Diversion Measurement	20%	60%
Real diversion against 1995 baseline	92%	60%

In the example in the table, Company A looks worse than Company B, because by current diversion measurement, they are only diverting 20% of what they generate, whereas through significant effort and innovation, they reduced the waste they create by 9,000 tonnes, resulting in a significant environmental benefit. The leaders at the workshop wanted a reporting mechanism which recognizes their leadership. If a company has already made significant progress in diversion, they will be unfairly penalized if diversion is calculated using the “current flow” method in the Discussion Paper. A better way is to measure progress as kg/employee, which recognizes and accounts for source reduction and reuse efforts was suggested. Participants felt that what matters is that waste to landfill is reduced and is going down, and that a measurement system needs to be developed which captures this trend. Reporting waste disposed per employee for each year is the best way to address this concern.

ISO 14000 vs Other Systems As a Method To Increase Participation

There was discussion about an ISO 14000 approach, and how effective this would be at achieving higher diversion. Participants liked the fact that ISO 14000 is rigorous, in that participants must follow a prescribed methodology, but it allows a company to formulate their own response; it does not mandate a specific action. However, ISO 14000 certification is very expensive, and was not considered necessary to achieve higher diversion. ISO 14000 needs one full time person on staff dedicated to meeting the requirements of the certification program; most companies can not afford this, particularly small and medium sized companies.

Participants agreed that any type of EMS (environmental management system) should achieve similar waste diversion impacts but at much lower cost and significantly less administrative burden for the business. Participants wanted a process which was flexible and less costly than ISO 14000. One industry association representative described a "Sustainability Management Program" which they are currently developing for their members; this model could possibly be adapted to small businesses and do more than ISO 14000. The plastics industry (through EPIC or CPIA) have a program which is tailored to the plastics industry (and could be adapted for other industries).

How to Motivate and Engage Non-Participants

Participants felt that the key question is how to get best practices adopted by those who do not currently divert waste. Sharing of best practices was considered the best way to increase participation in waste diversion efforts. Associations have an important role in leveraging current initiatives; success stories should be shared through associations, because they can effectively communicate and share success stories and provide training to their member companies. Ministry support of training programs delivered through associations was suggested. The Ministry developed a training program (through AMRC) when the 3Rs regulations were initially promulgated in 1994. Municipalities such as Toronto and Peel among others held extensive training sessions targeted at local businesses to make them aware of waste recycling and other diversion options.

A suggestion was made that having an environmental policy supported by senior management should be as essential as having a health and safety policy. Waste is generally tracked as part of an environmental policy. If companies posted waste statistics on their website as part of their environmental policy, the MOE could start to collect company specific data and waste statistics through website research.

Awards given to member companies by trade associations, and a nomination process where sister companies nominate peers for environmental excellence were considered good method to raise awareness of environmental issues, and waste management and waste diversion in particular.

Construction and Demolition Waste

One participant (Bob Sawatsky of Renova Consultants) felt that the renovation sector alone probably produces 15% of all of the waste disposed in the Province of Ontario.

It was considered essential for the Ontario government to lead by example, firstly by complying with the requirements of the 3Rs regulations for all of the construction, renovation and demolition projects which are associated with Ontario government ministries and activities. Some participants felt that construction and demolition projects carried out by Ontario government agencies who own and manage buildings do not currently meet the existing 3Rs regulations (which require source separation of materials and development of a waste audit and reduction plan for construction and demolition projects with a floor area of > 2,000 sq.m).

Ontario government contracts and specifications provide an ideal opportunity to specify what waste diversion must take place on Ontario government related or Ontario government funded construction and demolition projects. All government contract specifications should be reviewed to ensure that waste audits and waste reduction plans are developed for each C&D project, and are then enforced. The federal government has excellent purchasing specifications for construction and demolition projects which require contractors to submit a waste diversion plan as part of the bid package. Contractors comply with this requirement to win the work. Public Works and Government Services Canada (PWGSC) have excellent specifications which the Ontario government could use as a starting point.

Education, Training and Awareness

Many regulated companies are not aware of the existence of the 3Rs regulations after 10 years. A concerted education campaign is needed to raise awareness. Some companies will initiate diversion when they realize it is required by law. If companies become aware of the 3Rs regulations, they will initiate diversion efforts simply to be in compliance with existing legislation and regulations.

There is a need for improved awareness and education for those currently not involved with waste diversion. One participant felt that education makes enforcement easier. If an inspector arrives at a business location, at least all of the businesses who are aware of the 3Rs regulations will understand why the inspection is taking place.

Training could be mandated in the new or modified 3Rs regulations. Staff training was considered essential for effective waste diversion practices. One participant had achieved excellent diversion when cleaning staff at the buildings which they operate received training on source separation requirements.

Industry associations were considered an ideal partner for the delivery of training programs on the requirements of the regulations. A mechanism for industry associations to deliver training programs could be developed. The Ministry could support associations with the preparation of Guidance Manuals and training materials.

3.3 Question #2: What Are The Key Impacts of the Proposed Measures

It was considered important to identify the current participation and compliance rate (for both companies and also materials) with the existing regulations before expanding the current regulations.

It is essential to target generators who produce the most waste – data is needed to identify who these are

Workshop participants pointed out the importance of focusing on those who produce the most waste now. Before modifying the existing 3Rs regulations or adding new 3Rs regulations, it was suggested that the Ministry need to know which sectors generate which materials and how much they generate. This information could be collected through survey and other data collection systems. One participant suggested that companies could fill in a short one-page survey when they renew their business licenses.

May not achieve 60% unless small companies included

There was a feeling that all small generators added together could contribute a significant amount of the waste stream, therefore not regulating small generators (which was mentioned by Ministry staff) may mean that 60% diversion can not be achieved. A data collection and analysis process was suggested to get the answer to the question before regulating.

Bans will increase waste collection costs

There was limited support for a disposal ban on specific materials. A disposal ban must apply to everyone if it is implemented, although exceptions could be made for some areas such as Northern Ontario. The waste services industry makes multiple pick-ups with one truck; they will not know which generator put the banned material in the garbage. The impact of bans would be significant for the waste services industry as collection routes would need to be redesigned, increasing service costs to all businesses. A concern was expressed that transfer station operators would be taking responsibility for enforcing the bans but would not have control. Participants felt that bans which are too prescriptive may be a hardship for companies who are already doing a lot.

Source separating foods may contravene health and safety regulations

There are storage and sanitation rules with respect to food safety; there was a concern that source separation and storage of food waste may contravene some existing regulations or health and safety requirements for participating businesses such as grocery stores, warehouses and food service locations. The storage of food, and also safety were considered barriers

Do not be prescriptive - prescriptive requirements will be inefficient and expensive

Workshop participants also did not like the prescriptive provisions of the existing 3Rs regulations, which mandate the source separation of specific materials, regardless of the diversion achieved or the level of practical difficulty associated with source separation in some locations. Where source separation of a specific material is targeted or specified, it may only account for a small percentage of the waste in some locations, but requires a costly infrastructure to recycle and recover. The same effort could be directed to actions which would result in much higher waste diversion. The impact of the current source separation requirement would therefore be high cost for very small diversion. The solution is to allow flexibility for companies to choose how to achieve high diversion.

It was suggested that the 3Rs regulations should be less specific and prescriptive and let companies determine what materials to divert based on waste composition and facility specifications.

Harmonizing with Michigan not cost effective

A concern was expressed about changing the 3Rs regulations to harmonize with Michigan requirements. The waste services industry is able to meet Michigan requirements already through their own efforts. Michigan may also add other material requirements over time, or we may start sending our waste somewhere else, and Michigan requirements will no longer have a significant impact on Ontario operations.

Illegal dumping might increase

One participant felt that there might be an increase in illegal dumping if additional regulations are imposed in Ontario, based on previous experience with high tipping fees or restrictions such as material disposal bans.

Lack of space will increase costs of new regulations for some generators

Storage space is desperately short in some commercial locations such as office buildings or shopping malls. This makes source separation of materials difficult or impossible, as there is not simply sufficient space in loading docks and basements of buildings for a number of separate bins needed to source separate a number of different materials. This was identified as a concern and a barrier to increased waste diversion. The lack of space has resulted in a new business providing “one-stream separation” where companies put all of their recyclables in one bin. This bin of co-mingled recyclables is taken by the contractor for processing at a MRF to separate the recyclable materials into separate streams. The “one stream” approach is a solution for generators who want to recycle but have space restrictions. The trade-off with one-stream source separation is that the service provided by the waste company costs more than traditional service, resulting in higher costs. There is more contamination in the “one-stream” bin, and less diversion, with more waste residue being sent to disposal from the processing facility.

Education and information

Best management practices (BMP) information should be made available through sector specific Guidance Documents to companies who are interested in diverting waste. This information allows each sector to implement waste diversion as they see fit. The MOE supported a number of guides through the Green Office a number of years (separate guides were developed on energy, water and waste issues for the office building and restaurant sectors, for example).

Suggestions on 3Rs regulations

Do not make the regulatory environment more complex. Keep it simple. Non-prescriptive regulations were suggested a number of times during the workshop. A suggestion was made that the Ministry should be flexible and not micro-manage by specifying the materials to divert in regulations

3.4 Question #3: Provide Your Suggestions on Reporting and Enforcement

Companies With Multiple Locations

It was felt that reporting and enforcement should be at the corporate level, and not at the individual site level. An overall corporate waste diversion goal provides much more flexibility to concentrate waste diversion efforts in some but not all locations. Where there is a large company with multiple outlets, the head office should be the regulatory point, but each individual site can contribute to the diversion goal in a way which makes the most sense for the company, given their local circumstances. In the food service sector, large companies consist of individually owned and operated stand alone stores. The head office does not have day to day control at the franchise level, therefore consolidating all of the waste information from separate stores would be a huge task.

Reporting

Participants felt that the Ministry needs more data on existing waste generation by sector, and what materials and amounts of waste different generators generate, and how this material is currently handled. A suggestion was made that companies should be required to report on waste generation, composition, diversion and disposal through a short, simple form when they renew their business license.

Participants suggested that the Ministry could use existing mechanisms in the Ontario regulations to get people to report the waste they recycle and dispose.

One participant suggested that if MOE add a requirement for reporting, they should reduce reporting requirements for something else to ease the reporting burden.

Participants felt that improved reporting would make people aware of their waste streams and lead to waste reduction.

There are existing examples of reporting (TSSA) which the Ministry could consider as models. A system could be adopted which allows less frequent inspection if you have a good record of compliance (inspect good companies every 4 years; poor companies every 6 months). Examples for chemical reporting (e.g. NPRI) were suggested as good models which the Ministry could follow for reporting systems.

There was a suggestion that the Ministry should first identify the resources they have to apply to reporting. IF they do not have sufficient staff to review and verify reports submitted, then they should not publish results.

Corporate sustainability reporting already addresses waste. Many companies have these reports. One participant felt that the MOE could use this source of information to compile Ontario IC&I waste statistics at the generator and sector level.

Establishing A Baseline

The current Statistics Canada reporting system only includes companies in specific NAICS codes, and misses a number of large diversion activities (scrap metal, manufacturing wastes going directly to another company and not through the waste management industry, etc). Therefore, real diversion is under-reported. The Ministry should work with Statistics Canada to establish a baseline from which diversion can more accurately be assessed and future diversion planning and measurement can be carried out.

Enforcement

Lack of enforcement affects business competition. Some companies will risk non-compliance if there is no enforcement. This disadvantages those who have complied with the 3Rs regulations. The Ministry has to maintain a level playing field.

A building permit must be issued for all construction and demolition projects; one participant felt that this is an ideal place to enforce the 3Rs regulations for C&D projects.

Regulations must be enforced if you are depending on the regulations to drive diversion. Without enforcement, economics will drive diversion, and at the moment, it is not economically advantageous to divert some materials. Those who are driven by economics will ignore the regulations.

Some industries (e.g. construction) are enforcement-adverse; it is better to provide incentives to get them to divert. For the construction industry, a tax break on development charges if waste diversion is achieved would provide a strong incentive.

One participant was not a fan of enforcement and felt that it was a waste of time. This participant favoured a self-regulated, self reporting, self-certification system with random checks.

Self-certification was preferred to third party audits (which were strongly resisted by some participants).

3.5 Question #4: What are the two most important impacts and issues you would like the MOE to consider in their future plans

Enforcement is Critical

There are two drivers for diversion: economic and regulatory. If you choose regulatory measures, you must enforce. 70% of generators are involved in waste diversion because it makes sense economically, or because they have a corporate culture which supports environmental leadership. The remaining 30% will only participate if the regulations are enforced.

Clear Definitions

Make sure definitions are aligned with true diversion (reduction, reuse and recycling)

Need Good Data.

The most important statistic is what amount of material is still landfilled. Good baseline information is needed on waste generation, diversion and disposal by each sector.

Recognize Efforts To Date

Previous efforts must be recognized. Ensure that the way diversion is calculated accounts for and recognizes reduction from past practices

Do Not Penalize Good Performers

Good performers have source reduction under control, and have very little waste left to divert. The way diversion is currently counted, they do not get credit for all the work they have already done to reduce waste. Do not designate specific requirements which will penalize companies already leading the diversion effort.

Be Flexible and Non-Prescriptive

Set a target and let each company decide how to achieve the target in a way which allows them to be creative and innovative. Write regulations to be flexible and non-prescriptive.

Associations

Associations are considered essential partners, and are the ideal conduit through which education, awareness and training on waste diversion and the 3Rs regulations should be delivered to Ontario businesses. The Ministry should reach out to associations and leverage existing communication and education systems to reach a large audience.

Training and Education

Training should be mandated in the new or modified 3Rs regulations.

Ministry Resources for Enforcement and Reporting

Design a system which can be properly managed with the resources the Ministry has available to assign to the program.