

The Ontario Society of Professional Engineers (OSPE) is the voice of the engineering profession in Ontario. OSPE represents the entire engineering community, including professional engineers, engineering graduates and students who work or will work in strategic sectors of Ontario's economy.

The Ontario Ministry of the Environment, Conservation and Parks released its [Reducing Litter and Waste in Our Communities: Discussion Paper](#), detailing how the government will deliver on the Made in Ontario Environment Plan.

According to provincial authorities, Ontario generates nearly a tonne of waste per person each year, and 70% of our waste ends up in landfills, a statistic that has remained consistent in the last 15 years. OSPE agrees with the government's intent to change this and address the amount of waste produced in Ontario.

Prevent and Reduce Litter in Neighbourhoods and Parks

OSPE agrees with the government's approach to support actions that engage the citizenry and keep our Ontarian communities clean and free of litter and waste. Citizen engagement is key in order to combat the increased waste in our province. OSPE believes the government should take concrete action in educating the public about the impact of increased waste into our environment. A full producer responsibility approach, mentioned in this discussion paper, is also a necessary method in order to concretely decrease illegal dumping. In order to address this, the province must work with municipal and industry partners.

Increase Opportunities for Ontarian's to Reduce Waste

Ontario's diversion rate in the IC&I sectors has been stagnant for years. OSPE agrees with the government's recognition that more must be done to reduce and divert more of our waste in Ontario's businesses, institutions and places of commerce.

The inconsistency of materials collected through Blue Box programs is confusing, and requires harmonization across the province. Clear, transparent and harmonized rules and parameters are necessary in order to increase recycling across the province. These rules should consider the cost and impact of different packaging materials, and their respective impact to the environment. Resources should be allocated effectively to focus on those packaging substances that have the highest greenhouse gas (GHG) avoidance.

OSPE believes that Ontario Regulations 102/94 (Waste Audits and Waste Reduction Work Plans), 103/94 (IC&I Source Separation Program) and 104/94 (Packaging Audits and Packaging Reduction Work Plans) require review. The report claims that these regulations "do not adequately drive increased waste diversion". Further information is required in order to properly assess the merits and impacts of these regulations. It is important to understand what the cause

is behind the lack of positive results surrounding waste diversion. OSPE is concerned with the assumption that these regulations are ineffective without releasing a proper assessment and review of these to the public. It is imperative that the government engage in an evidence-based approach to their policies and be transparent to the collection and dissemination of this data. The Government's Environment Plan recognizes the need to increase waste reduction and resource recovery in multi-unit residential units. However, this plan fails to recognize the importance of requiring multi-unit residential buildings to fully divert their compostable materials. Legislation should be brought forward to require such practice.

OSPE also believes that the government must consult with appropriate stakeholders before moving forward with any changes to these regulations.

When it comes to real progress, OSPE agrees with the government's vision, that information, along with clear rules and strong enforcement, is critical to ensuring that the province is getting real results from the programs and initiatives to reduce, divert and manage our waste. OSPE believes that the Ontario government should continue to lever the existing partnerships and programs that are in place and have proven to be successful. One of these successful agreements is the Canada-Ontario Agreement on Great Lakes Water Quality and Ecosystem Health. This agreement has helped protect the quality of water in the Great Lakes Basin from harmful pollutants and invasive species.

The collection of information is vital to the development of environmental policies. The government should examine the data that has been collected in the past, and determine whether this data is being used appropriately or if further data must be collected. It is imperative that the government focuses on evidence-based solutions to the litter and waste problem in our province.

Make Producers Responsible for their Waste

OSPE believes that producers must be responsible for the waste they create. The province must adopt strategies that attract investment in new technologies that are environmentally friendly, as well as innovative when dealing with waste.

OSPE also believes that ongoing consultations with industry must take place to better assess which additional materials should be managed through producer responsibility, in order to properly maximize diversion.

Reduce and Divert Food and Organic Waste

When it comes to organic waste, OSPE is glad that the government of Ontario recognizes that food and organic waste, when broken down, is a potent source of greenhouse gases, which contributes to climate change.

Educating the public on the importance of preventing food waste is paramount. However, industry plays a vital role in these efforts as well.

Policy should focus on allowing the best use of organic materials, noting that there are high energy and environmental benefits when it comes to recovering these products. These interactions should be market driven, and consumers should be aware of such practices.

Reduce Plastic Waste Going into Landfills or Waterways

OSPE agrees that litter and plastic pollution on land and in water-bodies is becoming a worldwide pressing issue. It is also concerning that only 28% of all plastic packaging generated in 2017 was able to be recovered. Ontario can and should definitely do better.

OSPE believes the government should ban single use plastics. An initial ban should include: single use plastic cutlery, single use plastic plates, plastic straws, oxo-degradable plastics and food containers and expanded polystyrene cups. This ban is an important step to combat the increasing waste of plastics.

Provide Clear Rules for Compostables

OSPE agrees that producers should be responsible for end of life management of their compostable products. Producers must work together to ensure that the public has the necessary information to understand what is compostable and what isn't.

Recover the Value of Resources

OSPE supports the approach and primordial goal of reducing the waste we create.

When it comes to chemical recycling and thermal treatment, OSPE believes that recovery technologies such as these have the opportunity of playing a vital role within the product lifecycle. However, thermal treatment should be reserved as a waste disposal option and not necessarily as a desired diversion option.

Support Competitive and Sustainable End-Markets

Ontario definitely needs to stop its current reliance on landfills, and develop better ways to reduce and divert waste. It is important that municipalities are given a greater say in landfill approvals, while still monitoring the impact of landfills on our environment. New landfill approvals should still be subject to rigorous standards and procedures under the *Environmental Assessment Act*.

Summary

OSPE believes that the Government's Environment Plan sets some goals and discussion points that need to be addressed to move forward with concrete action on the environment. However, OSPE is very concerned with the lack of bold action and specific mention of any measurable targets and outcomes, aggrieve yet reasonable timelines, operational details, and/or clear costing mechanisms and analysis. All these aspects should always be considered when dealing with public policy options and government planning.

OSPE's submission recommends the government:

- 1. Is more transparent about its data when evaluating the efficiency of Regulations 102/94, 103/94 and 104/94;*
- 2. Ban single use plastics, starting with plastic cutlery, single use plastic plates, plastic straws, oxo-degradable plastics and food containers and expanded polystyrene cups;*
- 3. Make it mandatory for multi-waste residential buildings to fully divert their compostable materials;*
- 4. Regard thermal options not as a viable diversion technique, but as a waste disposal option;*

5. *Launch an educational campaign to inform Ontarians about the impact of increased waste into our environment;*
6. *Harmonize the types of materials collected through the Blue Box programs across the province and focus on providing clear and transparent parameters necessary in order to increase recycling;*
7. *Adopt strategies that attract investment in new technologies that are environmentally friendly, as well as innovative when dealing with waste;*
8. *Grant municipalities a greater say in landfill approvals, while still monitoring the impact of landfills on our environment. New landfill approvals should still be subject to rigorous standards and procedures under the Environmental Assessment Act;*
9. *Always ensures policy decisions are evidence based;*
10. *Set stricter targets and outcomes with specific timelines.*

OSPE looks forward to working with the Ontario Government to develop policy recommendations that address our current environmental challenges.

Sincerely,



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