Key Messages:

Ontario’s Draft Resource Recovery and Waste Reduction Strategy

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The Ontario Ministry of Environment & Climate Change (MOECC) is consulting on its proposed Draft *Resource Recovery and Waste Reduction Strategy*, in support of impending new Waste Reduction Legislation. This initiative is likely to impact many of Provision's member companies by restructuring the Blue Box and other waste diversion programs in Ontario. Timing for new Legislation is unknown, though it is expected sometime between now and Spring of 2016.

Provision staff attended a briefing by the MOECC on its **draft strategy** on September 23, 2015. Details on Ontario’s proposed strategy elements are found in the [***Ministry’s Power Point Presentation Slides***](http://www.provisioncoalition.com/Assets/Articles/September_2015_Strategy_Deck.pdf). Supporting future legislation, the proposed strategy covers additional goals, tools and resources for waste diversion programs, and addresses areas such as IC&I, new material designation and organics.

Topics addressed in the proposed strategy include:

* **Ontario’s aspirational goals:** These include achieving zero waste by 2050, zero Greenhouse Gas (GHG) emissions from the waste sector by 2030 and a circular economy with no resource extraction or disposal. In addition to aspirational goals, more specific measurable and achievable goals will be needed.
* **Promoting greater producer responsibility:** Ideas include harmonization of materials collected across Ontario, and new approaches using O. Regs. 101/94 and 102-104, which are the 3Rs (Reduction, Reuse & Recycling) regulations under Ontario’s Environmental Protection Act.
* **Targeting new areas such as organics for greater diversion**: In January 2015, the MOECC conducted informal conversations with stakeholders including with Provision on elements of an organic waste diversion strategy for Ontario. Provision’s key messages on organics remain relevant for the current consultations.
* **Considering producer responsibility for IC&I printed paper and packaging:** It is important that this take account of efforts by the IC&I waste generators as defined under the 3Rs.
* **Provincial Interests and Policy Statements from the Minister:** These would provide further direction to stakeholders. It is unclear how these would work relative to guidance or regulation. Direction could be provided on such things as “improved design and production of products and packaging”.
* **Smooth transitions from existing programs:** This includes from the current Blue Box and other Programs under the Waste Diversion Act. Existing Industry Funding Organizations would “wind up” in favour of new industry collectives. A new Delegated Administrative Authority is proposed in place of the current Waste Diversion Ontario.

Provision has been invited to attend a subsequent multi-stakeholder consultation (being hosted by the Assistant Deputy Minister Robert Fleming on October 14, 2015), to provide perspective from the food and beverage manufacturing industry.

In advance of the meeting, we are seeking members' input and alignment with Provision's key messages for discussion with MOECC.

**Draft Key Messages: Ontario’s Draft *Resource Recovery and Waste Reduction Strategy*, October 2015**

Provision has drafted the following key messages in response to the Ministry’s policy proposal for your input and feedback.

**Ontario’s Waste Reduction Strategy and Legislation**

* ***Ontario’s Waste Reduction Strategy needs to acknowledge Ontario’s role in the global economy.*** The concept of a circular economy does not make sense in Ontario alone. Sourcing, recovery and recycling of food and beverage products and packages are happening across multiple borders. Many companies have already minimized costs and resources as multi-national corporations. This includes reducing packaging while ensuring the integrity and safety of products with minimal breakage or spoilage.
* ***Ontario should lead in regulatory and operational harmonization with other provinces***. Ontario should be a leader in striving for waste management approaches and regulations that enable the efficiencies and cost effectiveness of harmonization across Canadian provinces.
* ***Ontario’s waste management objectives must be clear, measurable and achievable.*** Unattainable aspirational zero waste goals for 2030 or 2050 are not sufficient and will set up impacted stakeholders for failure and confusion. They also do not reflect business or consumer reality. There is a need for shorter term goals with milestones, coupled with clear agreed upon definitions and outcomes.
* ***Ontario’s Strategy and Legislation must be cost-effective, fact-based and subject to meaningful consultation*.** Any new waste reduction regulation or associated activities should be supported by cost benefit analysis.  Economies of scale for recycling waste are important, as is harmonizing solutions across provincial borders and enabling access to cost-effective infrastructure.  Barriers to any kind of recycling can occur in remote regions, or for SMEs where there is limited access to supply chain partners or to necessary technology. Ontario should not chase everything everywhere, but rather should focus on meaningful and cost-effective outcomes.
* ***Ontario’s waste reduction strategies must be evidence based*.**  For example, statements such as the percent of Ontario’s greenhouse gases attributable to organics in landfills must be documented. Similarly, current diversion numbers quoted for packaging and printed materials from residential or IC&I sectors must be well-documented and transparent. The current diversion rates from Blue Box are actually very strong, which should not be lost when compiling overall Ontario numbers. It is also important that new materials not be designated until careful assessment and specific criteria supporting an end market material value are available.
* ***Environmental and human health impacts of products and packages:*** are already well managed federally and do not belong in a provincial waste reduction strategy.
* ***Extended Producer Responsibility (EPR) programs should go hand in hand with a greater role and flexibility for industry in decision making***.  It is widely understood that a future Ontario framework will include Extended Producer Responsibility (EPR) with industry entirely funding the programs. The roles of consumers, municipal governments and service providers are also important for ensuring success.
* ***The need for or role of the proposed new Delegated Administrative Authority needs to be carefully considered.*** Such an Authority is not needed in other jurisdictions such as BC, the first Canadian jurisdiction with 100% EPR for individual producers.
* ***Proposed Provincial Interests and Policy Statements are confusing*.** Some realistic and tangible examples of how a fair and predictable marketplace will be enabled by these statements are needed. It is also important to understand how such directives would be developed, consulted and implemented.
* ***Program transitions must have a business/cost efficiency element.*** The strategies proposed in September 2015 are silent on this aspect for transition as well as for any other proposed strategy element.
* **For IC&I packaging and printed paper, business to business arrangements should be maintained.** IC&I waste should not be a producer responsibility; it should remain an IC&I business (generator) responsibility. The ICI sector already pays for its own recycling and waste programs. Mandating producer responsibility for IC&I would unfairly place the burden on producers regardless of who is generating the waste.

**Organic Waste**

* ***Organic Waste is a complex issue***: Food waste is an important component of organics diversion, but this is an extremely complex issue affecting the entire supply chain:  from farm, to food processing and manufacturing, through distribution, at retail, in food service and by consumers.
* ***Food Manufacturing is not the major source:***We recognize that all sectors across the food value chain must play a role in organics/food waste reduction. However, studies have shown that the food manufacturing sector does not appear to be a major source of un-diverted food waste. Existing data indicate that:
	+ ***The residential sector remains a major source of all organics going to landfill (47%)****.* Ref: Gooch, M., and A. Felfel (2014). "[$27 Billion" Revisited, The Cost of Canada's Annual Food Waste](http://r20.rs6.net/tn.jsp?f=001FCxQzphZIqULs5o1fkvg4JzfgDp4BxmOBeQnDNLdtttPOsOSSyy3LQut_3NXvaLbCcAF5jy8Wwxe2tQrKwawymreOuue-BHB3ZjUjDwxgp0tHK6-uGG6HmgFMjnji4nBdpZ7EUNkQM62zJ3U0VWdK_MLvb1F5mp77ejkUGrhCd1HDavgUDuAlS86leM8q7Koxh_p1ZYWdgcI-cPVZOuRtsz-HUF8KEFp-znwFLWjheC91pgkgH1GD7khe556k_XGNod2rnValet22_-S5kKcxV83IQDMwn-rWdT4-MDxiFU=&c=BAsz1ax6-XyITPu6T5R2R6Z9-s2Nk8aRHRzhWTzzL3byoZwgx94ciw==&ch=TIYAB3jX8eiI98Isimq7TBLXltKbJcrdJuuVJ72mOY8LZutlzPa8Mg==" \t "_blank)".
* ***Existing industry self-management best practices should be maintained and not replaced by regulation.*** For example, the existing supply chain for animal food production is clearly a major consideration that is working to ensure significant organics diversion from landfill. It is not clear why 'industry' should be categorized with commercial and institutional categories. Industry has been proactive and focused on waste reduction for many years. In fact, many manufacturers are striving towards aggressive zero waste targets.
* ***Ontario's focus should prioritize food waste reduction at the source***: A distinct objective of the food and beverage industry and that is aligned with the food waste management hierarchy, is to prioritize food waste reduction at the source and to maximize the % of food produced that is ultimately consumed by humans. A focus on waste prevention first, optimizes the economic, environmental and social value for business.
* ***Industry led approaches can tackle food waste***: Provision has identified food waste as a priority issue and is collaborating with its member associations, food and beverage companies and impacted stakeholders to address the $31 billion (Ref: Gooch, M., and A. Felfel, 2014) in food wasted annually in Canada. Provision has commissioned two groups, a Food Waste Working Group and a Food Waste Stakeholders Collaborative, to identify opportunities, solutions and best practices to decrease the amount of food waste sent to landfills or composting from food/beverage facilities. The Ministry should leverage, support, and recognize existing industry led efforts in their new action plan for organics.

**Who we are**:

* The leading voice on sustainability in the food and beverage industry, Provision consists of 11 member associations[[1]](#footnote-1) that represent the sustainability interests of manufacturers and input supply sectors across Canada. We are committed to representing our members' interests on sustainability issues, being a trusted information source for all parties with a stake in food and beverage sustainability, and to helping our members enjoy the benefits and opportunities that come with operating in a sustainable manner.  Provision's positions are based on science, economics and on the expertise and knowledge provided by its members.

We look forward to your input and feedback on the draft key messages.

Provision will continue to monitor the file with its partners on behalf of our membership.

1. The eleven member associations include: Baking Association of Canada, Canadian Beverage Association, Canadian National Millers Association, Canadian Oilseed Processors Association, Food & Beverage Ontario, Ontario Agri Business Association, Ontario Craft Brewers, Ontario Dairy Council, Ontario Fruit and Vegetable Processors Association, Ontario Independent Meat Processors and the Wine Council of Ontario. [↑](#footnote-ref-1)