

September 4, 2013

Via Email to: wendy.ren@ontario.ca

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Ministry of the Environment
Integrated Environmental Policy Division
Waste Management Policy Branch
135 St Clair Avenue West, Floor 7
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Re: EBR registry: 011-9260 and 011-9262 - Waste Reduction Act and Draft Waste Reduction Strategy

Dear Ms. Ren:

We thank you for the opportunity to comment on the the Waste Reduction Act (WRA) and draft Waste Reduction Strategy (WRS). ZeroWaste4ZeroBurning is a group of private citizens from Durham Region working toward a healthy, sustainable Zero Waste future for Durham Region. We are one of three organizations recognized by the Ontario Minister of the Environment in his decision on the Durham-York Waste environmental assessment to participate in the advisory committee for the Durham-York municipal solid waste incinerator. As a result of participation in the waste EA, we have acquired an expertise in waste reduction and incineration, both of which are relevant to the two EBR postings.

In our submission, we provide an outline of our recommended approach to waste reduction as well as comments on specific sections of the draft WRS.

General Comments

If the Province wants to leave a “new legacy” that would be an improvement over status quo, the Ministry of the Environment cannot continue with “business as usual”. Bill 91 and the draft WRS appear to be the outcome of the mandated five-year review of the Waste Diversion Act, 2002 (WDA). We point out that the WDA has been in force for over 10 years and it is likely that the new Waste Reduction Act, 2013 (WRA) will hopefully be in effect for a considerable amount of time. Thus, this government must “get it right” and set the tone for at least the next decade and perhaps beyond.

First, we must commend the MOE for the focus on the “3Rs” strategy in the present documents. We have frequently noted with some frustration that the MOE has made a number of statements in the past about “Zero Waste” and other initiatives but that there has been no clarity around the waste hierarchy nor has there been a policy framework recognizing and addressing the harmful consequences of poor waste reduction and management practices on public health and wellness, the economy and the environment. It is only now, when the 3Rs strategy is articulated in Bill 91, that there is some sort of clarity from the MOE.

Unfortunately, the vision of Zero Waste is only mentioned briefly as a text box (p.18) in the draft WRS. We respectfully urge the MOE to embed the vision and goal of Zero Waste throughout the WRS and the legislation, along with robust language for the protection of human health and the natural environment to reduce current impacts and prevent or avoid further future adverse impacts. The precautionary principle should be adopted as the basis for decisions and regulations to ensure that would be made in the public interest.

In this context, a peer-reviewed Zero Waste workable definition is offered by the Zero Waste International Alliance:

“Zero Waste is a goal that is ethical, economical, efficient and visionary, to guide people in changing their lifestyles and practices to emulate sustainable natural cycles, where all discarded materials are designed to become resources for others to use. Zero Waste means designing and managing products and processes to systematically avoid and eliminate the volume and toxicity of waste and materials, conserve and recover all resources, and not burn or bury them. Implementing Zero Waste will eliminate all discharges to land, water or air that are a threat to planetary, human, animal or plant health.” [Zero Waste International Alliance]

We point out that in practice, Zero Waste is a gradual approach that is implemented as small yet steadily introduced steps and that, over time, it alters societal attitudes and individual actions. Just as disposable items and planned obsolescence were gradually introduced throughout the last century, the reversal of this process cannot be mandated overnight. However, the implementation must proceed at a steady pace.

For the province to realize a vision of Zero Waste, a number of necessary measures must be given priority to shift the effort of waste management from so-called “end-of-pipe” measures with limited effectiveness to “front-end” strategies that eliminate waste. This approach is not new and we cite as a precedent Ontario’s post-Walkerton approach to drinking water. The province moved to an integrated strategy of rigorous water treatment and distribution with a “front end” strategy of source protection of aquifers, rivers and lakes. We hope that we will not need a tragedy of the same proportions to motivate prompt action on waste.

1 - The 3Rs: The Basics of Diversion

The order of the 3Rs - specifically, reduction, reuse and recycling - must be respected and a strong emphasis must be placed on waste reduction. Waste reduction, including targets for per capita waste generation reduction and by sector must be identified as priority.

We note however that the term “4Rs” has crept into waste management documentation and practices. The so-called fourth ‘R’ - recovery - has come to be a codeword for incineration in all its forms and thus is intrinsically incompatible with a Zero Waste goal. In this context, the term “diversion” cannot be a synonym for “diversion from landfill”. Instead, it must only refer to materials that do not go to disposal, in other words, neither land-filled nor incinerated. Consequently, we strongly recommend that all references to the “4Rs” or “recovery” be struck from the WRS, the legislation and supporting regulations.

2 - Container Deposit-Return: Ignoring an Ontario Success Story

A key waste reduction initiative not discussed in the draft WRS is “Container Deposit-Return” (CDR) with beverage containers the easiest place to start. Ontario has one of the biggest CDR success stories by way of The Beer Store and its high return and bottle reuse rate. The beverage industry has effectively killed or stalled deposit return in a number of jurisdictions including Ontario. If the Province is serious about Waste Reduction AND job creation, CDR must be included as a priority waste reduction and job creation strategy.

3 - Re-Use: An Opportunity for Job Creation and Community Building

There is little discussion of policies around “re-use” in the present documents. We note that there are efforts throughout Ontario to provide outlets for discarded clothes and household items. In charity stores, these items provide a material economy that supports low income Ontarians and provides opportunity for community-minded volunteering and fund-raising. In commercial second-hand outlets, these materials provide local employment and additional opportunities for fund-raising.

4 - Recycling: For the Right Reasons

Recycling programs are well known to the public but it is not evident that they are designed or implemented in the public interest.

Recycling programs should be designed and implemented with clearly stated objectives consistent with expected benefits in the public interest: health, social, economic and environmental. We are concerned about the growing acceptance of “single stream” recycling (sometimes called “co-mingling”), the practice of collecting recyclable materials together in the same bin. This is usually promoted under the pretext of convenience to the public however it is often for the convenience of - profitable to - industry and waste haulers. The practice is not in the public interest nor is it consistent with the objective of achieving the highest and best use of recycled material.

Another impediment to recycling is that the waste industry is dominated by a few large companies and the competitive imbalance means that large players can drive out smaller local recyclers who could potentially introduce innovative and effective techniques.

The WRA and WRS should clearly state that dual- or multi-stream recycling with materials separated at source is the required recycling program so that that highest and best use of the material is made, and that the potential for local employment is enhanced. Materials degraded by single stream recycling programs often end up being exported or going for disposal, often to incinerators. As waste management contracts (both in the public and private sectors) expire or are reviewed, existing single stream programs should be converted to dual- or multi-stream. Following this recommendation, producers and the ICI sector should be required to implement dual- or multi-stream recycling as they will develop new programs, in addition to various waste reduction and reuse programs consistent with clear targets, all with the public interest in mind.

The regulatory regime around recycling companies and organizations must be put in place to restore public trust in the system. Recyclers must meet certain standards, be inspected, be subject to enforcement. Although tracking manifests as is currently done for the transportation of hazardous materials is impractical,

recyclers should be required to document that materials sent to them by producers are properly recycled. Leaving it to producers and their stewardship organizations to track and report processing outcomes is not sufficient, in part because producers have financial – and therefore competing – objectives. Good recyclers will welcome the level playing field.

5 - Composting: Reducing Toxic Leachate and Methane Generation

“Green bin” programs or similar collection of organic wastes MUST be required, with organics banned from disposal. Currently some municipalities offer this service to residences but there are few if any programs that systematically provide those services to apartment buildings (low- and high-rise) and the ICI sector, e.g. food preparation. Aerobic composting offers the most opportunities to preserve carbon in solid form, thus avoiding the formation of greenhouse gases such as CO₂ and the more potent methane. Organic materials are also in large part responsible for the production of toxic leachate from landfills with the potential of polluting aquifers.

6 - No Disposal of Recyclable or Hazardous Materials

Incinerators and landfills should be required to undergo a secondary sort (where the primary sort is at the source) prior to burning or dumping. This would ensure that ALL recyclables, organics and hazardous or electronic wastes would be removed prior to disposal.

7 - Incinerator Ash: Treat as Toxic

Incinerator bottom ash should be banned from any non-hazardous waste landfill in Ontario. The incinerator industry has expressed a desire to re-classify its waste - incinerator bottom ash, char or slag - as products to be used in roadbeds, construction material, concrete etc. The wastes include toxic by-products of combustion and, by embedding them in apparently benign re-uses, contaminants are introduced into the human and natural environment outside of any possibility of control or management. The WRA must enable regulations to expressly forbid such reclassification.

8 - Transparency and Trust: Public Representation

The public MUST have ample representation on the proposed Waste Reduction Authority (WRA) to ensure transparency, accountability and that the public interest concerns and objectives are articulated early to all stakeholders. Representation must include individual public members as well as NGOs with a history and interest in waste issues as part of their mandate related to public health and natural environment protection. How the 3Rs would be implemented cannot be left solely or even primarily to the “municipal-industrial complex” i.e. the waste industry, municipal and ministry staff, industry consultants etc. Clear accountability mechanisms and regular public reporting must be required, as well as enhanced accountability mechanisms such as being subject to FIPPA, the Environmental Bill of Rights and subject to oversight by the Ontario Ombudsman.

9 - Incineration Is Disposal

If the Province is serious about the 3Rs, new waste incinerators – public or private – must be banned, with no expansions granted to currently operating or approved incinerators. Incinerators require predictable contracted waste volumes over long periods and thus compete with 3Rs initiatives. As a current example,

Durham Region's diversion rate has stalled as their Works department focuses now mainly on their expensive incinerator, which siphoned funds away from diversion budgets in the past and reduced available funds for future improvements.

The continuing approvals of incinerators by MOE's Environmental Assessment Branch (EAB) has the effect of undermining and undercutting all provincial policy on the 3Rs of waste, Zero Waste, as well as impeding public health and environmental protection, pollution prevention and implantation of effective policies to address climate change. Those us involved in the Durham-York EA saw evidence that the EAB may not have fully understood, or been prepared to review thoroughly, the range of public health and environmental impacts from incineration and may not be aware of current research around public health and environmental impacts of waste incinerators – from emissions to process residues. The ministry also dithers and has not yet implemented regulations on key pollutants such as fine particulate matter (PM 2.5) – a non-threshold pollutant known to be emitted by incinerators and known to cause health impacts. Thus, the ministry approval of the Durham-York EA required only minimal monitoring, testing and public reporting of emissions (and even then, only of limited emissions) and did not require a secondary sort to ensure that no recyclables, organics or hazardous or e-waste would be burned.

The alacrity of the EAB to approve incinerators is an example of the inconsistency of the ministry's approach to waste issues, where one branch is working at cross-purposes. To external observers, the contradictions are glaringly apparent.

Specific Comments on the draft Waste Reduction Strategy

In this section we briefly comment on specific points within the draft Waste Reduction Strategy in page order. We use these points to support and reiterate the principles that we have outlined above.

Page 7 - Why is transformation needed?

The primary focus must be on the first two "Rs" - waste reduction and material reuse - not just recycling, as the strategy seems to indicate. This must also apply to ICI sector and residential waste.

Waste generation reduction targets must be set in addition to diversion and recycling targets. This should apply to all material, with disposal bans on things like single use items such as disposable cutlery and coffee cups if they are not fully recyclable. Over the last few years, it seems that "political" decisions have hijacked waste policy – often ad hoc and conflicting. There is a lack of a clear waste hierarchy with policies clearly focused on 3Rs.

The incinerator industry and its lobby (which includes some municipalities flogging incineration to their counterparts) have attempted to add a 4th R "recovery" which undercuts and undermines all work around the 3Rs while creating bloated and expensive waste bureaucracies at the municipal level.

Incineration must be clearly designated in all Ontario policy and regulations as disposal, with no diversion or other credits for materials recovered from process residues (metals from ash) nor subsidies for energy created from burning waste. Policy inconsistencies not only confuse the public, but they allow industry – often aided and abetted by municipal staff and politicians - to have undue influence. Ultimately, this has impacts on public health and the natural environment, as well as adverse social and economic effects.

With little leadership and few champions at the federal or provincial level, diversion rates are stagnating across Canada, with waste generation reduction achieved only in some jurisdictions¹. We reiterate the economic and job creation potential, backed by numerous studies by NGOs and others confirming that more jobs are created by various 3Rs initiatives (e.g. deposit return, recycling) than disposal and recommend again that the 3Rs be mandated in the ICI sector.

Municipal staff and politicians, whose interests are increasingly less aligned with the public interest and more than ever with corporate agendas, make many of these recommendations and decisions in the absence of clear Ontario waste policy frameworks. What's needed is legislation that would enshrine Zero Waste as a primary objective, focused on the 3 Rs in descending order, **together with** protecting public health and the natural environment.

Page 9 Need Action on ICI Sector

3Rs must be mandated for ICI sector. Everything from mandating waste reduction and generation targets through to re-use and recycling, revising tax code to remove barriers etc. must occur within a context that ensures the public interest is properly identified and protected through appropriate legislation, regulation and enforcement.

Page 11 uses the term “the proposal provides a balanced approach” – that is meaningless or code for attempting to please everyone, which can't and should not happen. Having gotten a free ride for an awfully long time, producers and businesses will resist and attempt to use their various levers to influence and to water down efforts by the Province to bring in clear and effective legislation that would have a chance of meeting bona fide Zero Waste objectives and the protection of public health and natural environment. To put this in the simplest terms, if producers make a product that contains toxic or hazardous material or that is not able to be disassembled or safely recycled, composted or re-used, then they should not be permitted to produce it or sell it in Ontario – they should not be simply asked to pay for disposal as the easy out. In Provinces where producers have been given carte blanche, it seems that they have hijacked Extended Producer Responsibility (EPR) programs, with possible outcomes that do not bode well for the public, such as with the MMBC in British Columbia.

In this section when describing disposal options, you should not refer to landfill only. Incineration has been approved as a disposal option in Durham and York Regions, as one example.

¹ “Data shows Canada's first waste diversion drop in a decade”. *Solid Waste & Recycling*. 2013-08-21 Accessed 2013-09-04 http://www.solidwastemag.com/news/data-shows-canadas-first-waste-diversion-drop-in-a-decade/1002544309/60rr4sy8w30W6x08yM2vx/?ref=enews_SW&utm_source=SW&utm_medium=email&utm_campaign=SW-EN08272013

Page 13 -Ontario's waste reduction history

Ontario's blue box history is a sad chapter whereby the Province allowed members of the beverage industry to avoid a legislated requirement to sell a certain portion of their products in refillable bottles and paid only a small amount to set up curbside recycling for bottles and cans. Taxpayers have borne the most of the blue costs until recently.

What's accepted in the blue box must be standardized across the Province with the view to increasing materials accepted, NOT lowering standards to the lower standard of service. Municipal waste departments often appear to have competing objectives: the left hand wants to reduce and recycle while the right hand wants to incinerate. This undercuts the 3Rs, and is confusing to and expensive for residents and taxpayers. Many externalized costs such as incinerator pollution are not fully addressed with costs of those borne by others. Waste reduction and the 3Rs reduce the need for any form of disposal, landfill or incineration.

Page 17 Where are we headed?

- All consultation on the WRA and WRS must occur with the public formally recognized as a key stakeholder group.
- Materials to be designated at the earliest opportunity should include textiles and construction and demolition waste.
- Equally important, eliminating certain materials from products/packaging should be a priority as well (e.g. page 10-eliminate PVC from rigid plastics)
- "Recognizing municipalities for their role in providing diversion services" –what does "recognizing" mean in this context?
- A smooth and orderly transition is important would be a clear time frame to ensure action on legislation and related takes place in timely manner.

Pages 18-19 How we will get there?

The text box at bottom of page 18 –"Our vision is a province which moves toward zero waste...: ZW should be a clearly stated objective, as stated several times earlier in the document, as the overarching objective together with protection of human health and the natural environment.

Making producers responsible for "end of life" management on its own is not sufficient – cradle to cradle actions must be mandated within legislation that protects public interest.

The ICI sector must bring in dual/multi stream recycling programs that result in highest and best use of products – we cannot simply let industry choose which programming cheapest or most convenient.

Disposal bans must include all organics and recyclables as well as certain toxic materials.

The tools proposed on page 19 i.e. letting producers decide must occur within context of the above stated objectives. We don't need another industry-led hijacking of waste policy as occurred with the blue box in the 1980s, when industry did an end run around deposit return.

Page 20 -Proposed Waste Reduction Act 2013

Result 1 – second paragraph. *"Energy from waste for designated materials will not be allowed to meet waste reduction standards"*

The above stated principle cannot be in any way diluted or removed and any references to the “4Rs” must be struck from all waste related policy and legislation in Ontario.

Furthermore “recovered” metals from incinerator ash/char/slag cannot be permitted to count towards municipal or producers’ diversion targets.

Page 21 – “Producers may also be required to undertake promotion and education to ensure that consumers have adequate knowledge of recycling options”

Great care must be taken to ensure the public/consumers are educated in a clear, fact based manner and that producers/industry don’t put out self-serving propaganda or marketing material in attempts to sway and/or mislead the public. “Education” material, especially that directed at the public and schools, must be consistent with 3Rs policy and be accessible.

For an example of inappropriate “communication” put out by a municipality, we cite what Durham Region incinerator project team staff developed last fall – crafted with the input of incinerator operator Covanta Energy. The draft “Community Communications Plan” which, if approved by MOE, would form the basis of their communications to “educate” Durham residents – including school children – about waste issues². This document is a combination of marketing and propaganda with the clear intention to greenwash incineration and to indoctrinate the public and school kids into accepting the incinerator and the industry preference for 4Rs.

Page 21 -Tool – Make producers responsible for recycling

To this must be added AND be required to “implement and pay for waste reduction/ re-use initiatives”. This is where there should be a discussion about deposit-return for beverage containers, as just one example. This would reduce waste and increase employment opportunities for small businesses, charities and individuals. Producers should pay for recycling programs, organics collection etc. but develop programs in accordance with public interest objectives.

Page 22 – Let producers decide how to meet recycling requirements.

This is inappropriate for several reasons including because most producers are for-profit private corporations whose objective is to maximize profits while reducing costs. To repeat earlier comments, you cannot simply let producers decide what is in their interest – their 3Rs programs must be consistent with public policy objectives. ICI recycling cannot be allowed to devolve into single stream, generating tons of contaminated or low value recyclables to be processed by large waste industry players who will push out local recyclers who won’t be able to compete with them, and with much of the material exported (along with the jobs to reprocess). Furthermore, single stream could result in large quantities residues that require disposal. Dual or multi stream preserves the value of the material allowing it to be recycled/reprocessed into highest and best use, preferably locally.

Result 2 – Transform WDO into a strong oversight and compliance body

² Durham York Energy Centre. *Draft Community Communications Plan*. September 2012.

[http://www.durhamyorkwaste.ca/pdfs/project/community_communication_plan/2012.10.05_DYEC%20Draft%20Community%20Communications%20Plan%20\(September%202012\).pdf](http://www.durhamyorkwaste.ca/pdfs/project/community_communication_plan/2012.10.05_DYEC%20Draft%20Community%20Communications%20Plan%20(September%202012).pdf)

Tool – Transform WDO into a new Waste Reduction Authority (WRA)

We are not privy to details about all that went wrong at WDO but the fact there were no public members, little transparency and accountability undermined public confidence in WDO. The chances of WRA to provide an “independent, robust oversight and compliance framework for producer responsibilities” would be greatly enhanced by public membership, public accountability top notch transparency and reporting mechanisms - otherwise it’s could be just another taxpayer funded club for producers, waste industry players and bureaucrats.

WRA SHOULD be the body consult with the public and develop and disseminate fact based information to the public about the Act, waste reduction strategies, the key objectives and policy context for 3Rs programming, as opposed to this being left primarily to the the producers (or municipalities) as stated earlier in the document (page 21)

Page 24 - Suite of tools for WRA

The public must be consulted on what might be contemplated here – very vague. The public must have confidence in the WRA and know that mandate is appropriate in scope, that there effective tools and processes to ensure that waste policy would be implemented by producers and municipalities in a manner consistent with public interest objectives.

Page 25 – Tool – Ensure proper oversight of the WRA

Bill 91 must provide strong accountability structures to ensure that WRA accountable to legislature and public. Public oversight is essential to the public having confidence in WRA. Other accountability structures would include FIPPA, Environmental Bill of Rights, and the Ombudsman Act.

Annual reporting may not be sufficient especially since much of what is proposed in WRS is so vague. E.g. as various producer programs would be developed, there should be consideration to put some of these out for public comment.

Page 25-26 – Tool – require diversion costs to be part of the product price.

“All in pricing” on in and of itself may not provide an incentive to producers to redesign their products to be either reusable, recyclable etc. As long as disposal is cheaper than waste reduction or diversion, there will be a strong incentive to find ways to burn or dump. Single stream recycling programs could pose such a danger.

Page 26– Tool –Ensure clear and accurate product pricing.

Consumers/public need to know not just the costs of recycling but also who the recyclers are, what happens to the material, do they operate consistent with public interest objectives and consumers/public must have the opportunity to verify recycling/processing outcomes for producers and their recyclers including their inspection/enforcement histories.

Page 26-27 – Increase support for municipal recycling

Tool – Define municipal role in collecting designated wastes and ensure their reasonable costs are reimbursed.

Not all municipalities act in manner consistent with public policy objectives. WRA must not allow municipalities who engage in waste practices inconsistent with the 3Rs e.g. who own/operate incinerators to

in any way water down any legislation or policy to obtain preferential treatment or terms e.g. counting metals from ash/char/slag as “diversion”.

Should a municipality choose to collect designated wastes for diversion.... Standards should ensure that if a material is designated and recyclable, a municipality should collect it.

Municipalities, especially those who send residuals for incineration, must be required to use clear plastic bags for residuals sent for incineration so as to ensure that no recyclables, organics or hazardous/e-waste are burned. Markham, part of York Region who is a minor partner in the Durham-York incinerator, has adopted a clear bag policy for residuals in their effort to both increase diversion and get out recyclables and hazardous waste in advance of residuals being sent to the incinerator. See:

<http://www.solidwastemag.com/news/zero-waste-journey/1002451839/>

However, your WRS provides an undesirable example by highlighting Peel Region’s single stream recycling program in the “did you know” text box. . What portion of the 130,000 tonnes processed require final disposal? Peel council just voted recently to build a second incinerator.

Further, curbside collection and recycling programs should not be used as opportunities for waste companies to “advertise and market” – as Durham Region did with their curbside battery collection program. One of the “sponsors” is the incinerator operator whose name appeared on the collection bag–i.e. operator of a disposal facility that has NOTHING to do with recycling.

Page 28 – the public/taxpayers must be part of the discussion of blue box cost reimbursement – after all taxpayers pick up the portion producers will not.

Page 29 – Result 5 –Increase the diversion of a wider range of wastes

Paper and packaging recycling - to repeat, with new recycling programs to be developed for ICI sector, single stream should be prohibited.

Mandate collection of ICI organic wastes at the earliest opportunity – yes it may be complicated but this cannot be “voluntary” and will go a long way to address adverse impacts of organics sent to landfill, as just one example.

Report to and consult with the public about program options under consideration for ICI recycling and organics collection.

After recycling programs in place, require clear plastic bags for “residuals” to ensure that no recyclables or organics sent for disposal.

The town of Markham is not only a leader in residential diversion and also has an extensive Zero Waste program for municipal buildings and municipal events and should be a valuable resource.

Page 30 – creation of “synergies

Great care must be taken to prevent large waste industry players from squeezing out innovative local recycling and re-use operators.

Designate additional wastes over time - the public needs more information as to the range and composition of waste that could be considered here.

Page 32 – use disposal bans to increase diversion.

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To repeat, ban organics and recyclables, hazardous /e-waste from disposal. Require clear bags for residuals for both residential and ICI sectors to incent compliance.

Page 32 – Result 6 – *Transition existing programs in a timely and smooth manner.*

Consult both public and producers around increases to producer Blue Box funding. If your message is to be that waste reduction and diversion will be the cost of producers doing business, take action that is consistent with that message – don't water it down with delayed cost increase phase ins etc. As concerns "mitigating costs to producers of increased producer funding (page 33)" – everybody needs to be reminded that taxpayers have paid far more over the life of the blue box program than producers have.

Page 34 – Action

WRA will undertake and oversee program transition.... Extensive consultation with IFOs, producers, municipalities, waste management service providers and the public would occur..... The public needs to be include at the earliest stages of all consultations – not be invited to a useless open house after all kinds of closed-to-the public sessions have occurred.

Page 37 – *Your thoughts?*

What has been presented in the WRA and the WRS is in many cases general and vague, which understandable to some degree at this time. However the devil will be in the details and, given inaction on the waste file, MOE must make the WRA and WRS a priority. This is not just a waste issue, it is also a public health, environmental, social and economic issue as well. The public must be recognized by MOE as a stakeholder on par with any producer, municipality, waste management professional, and be consulted in the same manner at the same time – i.e. early and often. There are members of the public who have expertise in various aspects of what the WRA and WRS consider, who understand complex and complicated issues and public policy development, whose input must be considered at all stages.

We request that we be advised of all future related reports and consultation opportunities, as well as when a decision would be posted to the EBR.

Yours truly,

ZeroWaste4ZeroBurning