

Clause embodied in Report No. 10 of the Works Committee, as adopted by the Council of the City of Toronto at its meeting held on June 26, 27 and 28, 2001.

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**Report of the City of Toronto
Waste Diversion Task Force 2010**

(City Council on June 26, 27 and 28, 2001, amended this Clause by adding thereto the following:

“It is further recommended that:

- (1) the confidential report dated June 27, 2001, from the Commissioner of Works and Emergency Services, be adopted, such report to remain confidential, in accordance with the provisions of the Municipal Act, having regard that it contains information related to the security of property interests of the municipality or local board, save and except the following recommendations embodied therein:*

‘It is recommended that:

- (a) the Commissioner of Works and Emergency Services be authorized to conduct a due diligence in respect of the proposal by Canada Composting Inc. for an assignment to it and its partners, BTA, Trow Consulting Engineers Ltd. and W. S. Nicholls Construction Inc. of the Design-Build Contract for the Dufferin Mixed Waste Recycling and Organics Processing Facility and, in addition, negotiate appropriate business terms for the operation of the facility; and*
- (b) the Commissioner of Works and Emergency Services report back to the July 2001 meeting of Council on the results of the due diligence and negotiations and, as well, on the details on the process for expansion of the facility.’;*
- (2) Councillor Jones, Ward 6, Etobicoke-Lakeshore, be appointed as Chair of the Sub-Committee of the Works Committee established to look at the creation of a ‘Take It Back’ Program and/or Product Stewardship Initiatives for Household Hazardous Waste, as set out in Recommendation No. (10) of the Waste Diversion Task Force 2010; and*
- (3) the Commissioner of Works and Emergency Services be requested to submit a report to the Policy and Finance Committee for its meeting scheduled to be held*

on July 12, 2001, on a schedule for the weekly collection of organics, recycling and residuals.”)

The Works Committee unanimously recommends:

(I) that the following recommendations of the City of Toronto Waste Diversion Task Force 2010, contained in the report “Beyond Landfill: A Diverting Future”, be adopted in principle and referred to the Policy and Finance Committee for consideration at its meeting on July 12, 2001, and for a report to Council on October 1, 2 and 3, 2001:

“A. Source Separated Organics:

- (1) that City staff design and structure a schedule for weekly organics collection and bi-weekly recycling/residuals collection, with a four-year phase-in beginning Spring 2002;**
- (2) that City staff design and structure a source separated organics management education and communication program beginning in Fall 2001, and consider the following activities:**
 - (a) public meetings across the City, hosted by Ward Councillors, to promote participation; meetings will mainly take place as the implementation date for each ward approaches;**
 - (b) Diversity Advocate role to assist in promotion to ethno-racial communities;**
 - (c) participation of local Residents’ Associations; and**
 - (d) engagement of Waste Watchers;**
- (3) that the City engage the marketplace to provide the required treatment capacity in 2002 to manage the City’s source separated organics prior to the commissioning of the City’s new Dufferin Transfer Station anaerobic digestion facility (now under construction);**
- (6) that the \$2.4 million put aside by Council this year for additional trucks be used to offset some of the costs of the necessary trucks for this program; and**
- (7) that funding for the required kitchen residuals collection containers be attained through a benefiting assessment;”**

(II) the adoption of the following recommendations of the Waste Diversion Task Force 2010, amended to read as follows:

“A. Source Separated Organics:

- (5) that the City terminate its consideration of proposed aerobic composting facilities other than for yard residuals;
- (8) that the Waste Diversion Organization be requested to actively consider the introduction of a supporting financial program for municipal-based collection, processing, and marketing of source separated organics;

B. Take It Back Program and/or Product Stewardship Initiatives:

- (9) that City Staff report back in Fall 2001 on a source separated system for multi-residential buildings to begin in 2003;
- (10) that a sub-committee of the Works Committee be established to look at the creation of a “Take It Back” Program and/or Product Stewardship Initiatives for Household Hazardous Waste; and that Councillors Layton and Pitfield be appointed to the sub-committee;
- (11) that the sub-committee’s mandate be to establish a “Take It Back” program similar to the system in Ottawa and/or Product Stewardship Initiatives similar to the Province of British Columbia;
- (12) that the sub-committee be chaired by a member of the Works Committee;
- (13) that the Toronto Environmental Alliance (TEA) and Target Zero be invited to participate;
- (14) that \$20,000.00 be put aside from the 2001 funding available for diversion programs (Account No. SW0005), to help with administration of the sub-committee;
- (15) that the sub-committee be requested to report back by the Fall of 2001 for commencement in January 2002;

C. New and Emerging Technologies:

- (16) that City staff report to the Works Committee in Fall 2001, in consultation with the Ward Councillor, on a lease of land, possibly on the Gulf Oil site or another site on the Port Lands, to Enwave/Toronto Hydro for a potential energy facility;
- (17) that staff be directed to enter into partnership with other GTA regions for the purpose of exploring new and emerging technologies. Councillor Balkissoon should be the lead for Council on this initiative;
- (18) that staff be requested to come forward to the Works Committee twice a year with a report on the status of each of the three processes identified or any other diversion solutions;

D. Blue and Grey Boxes:

- (19) that City staff design and structure a bag program to supplement the existing Blue and Grey Box programs, including a potential partnership with the private sector, and report to Council in Fall 2001;

E. The Depot Program:

- (20) that City staff design and structure two city-wide garage sales or giveaways at the Exhibition or Downsview sites, whereby all residents of the City of Toronto would be invited to participate;
- (21) that City staff design and structure a Mayor's proclamation for two "Amnesty Days" per year that would encourage residents to put their unwanted goods by the curb where they could be picked up by others;
- (22) that City staff design and structure a cost-neutral curbside collection method for scrap metal;
- (23) that City staff review the possibility of an increase of styrofoam recycling and the possibility of adding it to the Blue Box;
- (24) that City staff review the potential installation of woodbins at transfer stations to allow for the public to deposit used wood;
- (25) that City staff be instructed to establish a list of items that can be collected at each transfer station depot;
- (26) that City Staff report back on the above listed items in Fall 2001;.

F. Home and Garden Composting:

- (27) that the City re-start truckload sales for backyard composters, even without the \$10.00 subsidy;
- (28) that City staff report in September 2001 on:
- (a) a phone campaign by volunteer Waste Watchers to contact everyone who has a backyard composter and offer tips, as well as asking about their interest in vermi-composting (composting with worms);
 - (b) putting a compost display at Nathan Phillips Square to manage organic kitchen residuals generated at City Hall's Café on the Square;
 - (c) putting one compost display in each Ward or community garden;
 - (d) any other possible opportunities identified in the community meetings, as contained in Appendix L; and

- (e) the establishment of a worm composter at City Hall, such report to be submitted by the appropriate staff to the appropriate committee;

H. Bag Limits:

(30) that bag limits for residual garbage be lowered to five bags every two weeks in 2002 and four bags every two weeks in 2003;

(31) the issue of bag limits be reviewed by the Works Committee in January 2003 to see if there should be further reductions;

I. The Provincial Government:

(32) that the City encourage the provincial government to immediately establish a permanent Waste Diversion Organization to legislate on an urgent basis private sector financial contributions to fund the Blue Box program. Financing should be high enough to ensure that the program can operate at no cost to the City;

(33) that the City encourage the Province to follow the principles of the first two R's – reduce and reuse – and mandate a deposit-return system for beverage containers; and that City Council reaffirm its position that this system include the immediate implementation of a deposit-return for the Liquor Control Board of Ontario;

(34) that the City call on the Province to review packaging regulations and guidelines. The goal of the review should be to reduce the amount of packaging that must be managed, and to bring in incentives for industry to make or use packaging that is readily recyclable and maximize recyclable content (such as PET and HDPE plastics), instead of products designed for disposal after one use;

J. The Federal Government:

(36) that City Council call on the Federal Government to bring in an infrastructure program specifically designed to provide municipalities with funds to build recycling and composting plants;

K. The Private Sector:

(37) that the City actively pursue advertising revenues linked to Environment Days and corporate sponsorship of recycling programs;

L. The Community:

- (39) that City staff report back in Fall 2001 on an educational/promotional campaign to encourage the widespread adoption of its diversion strategies;
- (40) that the City perform resource audits on litter collected, and pursue main offenders, particularly the fast-food industry, to provide support for a clean city, including the adoption of litter bins throughout the City;
- (41) that the City analyze resource disposal practices on a community-by-community basis to identify the best communities, and develop an education program with the local Councillor's help to encourage the remaining communities to improve their performance;

M. Agencies, Boards, Commissions and Departments:

- (42) that every Agency, Board, Commission and Department submit to City Council by January 1, 2002, through the office of the Commissioner of Works and Emergency Services, a plan to achieve, as a minimum, Council's diversion targets;

P. Separate Bill:

- (43) that the City explore a number of options for billing residents for resource management, such as: creating an "environmental control bill" or "green bill" jointly with Toronto Hydro and Toronto Water; sending out in the same envelope as the property tax bill a separate tax bill dealing with garbage only; asking the Province to allow Council to make note of the garbage portion of the tax bill; or, continuing to make notes on the tax bill envelopes; and that the discussions with respect to such options be held at the Resource Diversion Implementation Working Group, recommended in Recommendation No. (47);

Q. User Fee:

- (44) that City Council not implement a user fee, at this time;
- (45) that City staff report in January 2003 on a user fee, in conjunction with the bag limits report;

R. Benefiting Assessment:

- (46) that City staff report to Council in Fall 2001 on an appropriate container for an organics collection system for single family homes and a means of funding the containers, in addition to the benefiting assessment as proposed in Recommendation No. (7);

- (47) that the City create a Resource Diversion Implementation Working Group as a sub-committee of the Works Committee, comprised of Councillors Disero, Balkissoon, Layton, Li Preti and Pitfield. The Working Group, which will be chaired by the Chair of the Works Committee, will be mandated to:
- (a) work with City on implementing resource diversion policies and recommendations that are adopted by Council;
 - (b) continue to meet on an ongoing basis with the public, the environmental non-governmental organizations and other stakeholders – at least until 2004 – to build support and momentum;
 - (c) follow up on the implementation of diversion solutions in apartments and condominiums;
 - (d) shape a more detailed strategy for ensuring that Council’s target of 100 percent diversion by 2010 is met; and
 - (e) review the issue of commingling materials from the Blue and Grey Boxes; and
- (48) that staff give priority to exploring the “No Cost” proposal by Green Tech to collect all used computer printer cartridges within the City boundaries, and report back to the Works Committee by September 2001;”
- (III) the adoption of the following recommendations contained in Appendix M of the Report of the Waste Diversion Task Force 2010, “Staff Recommendations to Waste Diversion Task Force 2010”, amended to read as follows, and that all other reports in Appendix M be received for information:

Item No. (4)(i) - Single-Family Residences and Multi-Unit Residential Buildings:

- “(1) that the Commissioner of Works and Emergency Services be requested to undertake a consultation process regarding the establishment of a service fee for solid waste management with stakeholders such as apartment and condominium management associations, ratepayers’ associations, condominium boards, members of the public, and other self-identified stakeholders; and
- (2) that the Commissioner of Works and Emergency Services, the Chief Financial Officer, and the City Solicitor be requested to submit a report to the January 2002 meeting of the Works Committee, and subsequently to the Policy and Finance Committee, containing recommendations for the establishment of a residential service fee for solid waste management services;”

Item No. (4)(ii) – School Boards:

- “(1) that as of January 1, 2002, all solid waste collected or received for disposal by the City of Toronto from the Toronto District School Board and the Toronto Catholic District School Board and private schools operating in the City of Toronto be subject to service charges based on full cost recovery;**
- (2) that the City of Toronto provide the Toronto District School Board, the Toronto Catholic District School Board, and private schools located in the City of Toronto with continued access to the City’s current Blue and Grey Box recycling service and leaf and yard waste composting program at no charge, other than the provision of approved collection containers and associated in-house management costs, and be subject to review after a period of five years commencing January 1, 2002; and**
- (3) that the current charge to the School Boards of \$12,500.00 for recycling from September 1, 2001 to December 31, 2001 be withdrawn;”**

Items Nos. (4)(iii) and (iv) – City Departments, Agencies, Boards and Commissions:

- “(1) that City Council establish a policy whereby all solid waste generated for disposal by the City’s Agencies, Boards, Commissions and Departments and City-controlled corporations be managed by the City’s Solid Waste Management Services Division, in order to avoid additional disposal capacity planning and tendering costs, potentially higher disposal costs and additional risk, and direct or request, as applicable, the Agencies, Boards and Commissions to adhere to the policy;**
- (2) that each Agency, Board, Commission and Department and of the City of Toronto and each City-controlled corporation be requested to submit to City Council for review and approval a comprehensive three-year solid waste diversion program by January 1, 2002, through a consolidated report to be submitted by the Commissioner of Works and Emergency Services;**
- (3)(i) that as of January 1, 2002, all solid waste collected and/or received for disposal by the City of Toronto’s Solid Waste Management Division from the Agencies, Boards, Commissions and Departments of the City of Toronto and City-controlled corporations, be subject to an intra-departmental charge-back (or other appropriate means of billing) based on a full cost recovery, with the exception of tonnage collected and disposed from residential units of Community and Neighbourhood Services; and**
- (3)(ii) that the City of Toronto’s Solid Waste Management Services Division provide Agencies, Boards, Commissions, Departments and City-controlled corporations with continued access to its existing Blue and Grey Box recycling service and leaf and yard waste composting program at no charge, other than the provision of approved collection containers and associated**

in-house management costs, and be subject to review after a period of five years commencing January 1, 2002;” and

Item No. (4)(v) – Charitable Organizations:

- “(1) that the City of Toronto maintain its no-charge solid waste disposal policy for Community Service Organizations currently receiving this service, subject to the provisions contained in Recommendation No. (2); and**
- (2) that by January 1, 2002, Community Service Organizations currently approved for no- charge disposal of residual solid waste be required to re-apply to the City of Toronto for this service, based on the provision of service conditions cited in this report, through the Commissioner of Works and Emergency Services”; and**
- (IV) that Council commend the Chair of the Committee, Councillor Betty Disero, and the Mayor for their leadership in co-chairing the Waste Diversion Task Force 2010, and express its appreciation to all involved in the work of the Task Force, including Councillors, stakeholders, members of the public, members of industry, environmental groups, all staff and the Union.**

The Works Committee reports, for the information of Council, having:

- (1) requested the General Manager, Solid Waste Management Services, to report directly to Council for its meeting on June 26, 2001, in camera, on the following Recommendation No. (4) of the Waste Diversion Task Force 2010:
- “(4) That, beginning immediately, the Dufferin Transfer Station be expanded in phases through the addition of modular components, at a capital cost of \$25 million or less (depending on the volume of organics collected) to process residential source separated organics. The Commissioner of Works and Emergency Services is requested to undertake the required engineering design and report back to Council in Fall 2001”; and**
- (2) received Recommendations Nos. (29), (35) and (38) of the Waste Diversion Task Force 2010.

The Works Committee submits the following Summary of Recommendations from the Report of the City of Toronto Waste Diversion Task Force 2010, “Beyond Landfill: A Diverting Future”:

(A) Source Separated Organics:

- (1) That City staff design and structure a schedule for weekly organics collection and bi-weekly recycling/residuals collection, with a four-year phase-in beginning Spring 2002.

- (2) That City staff design and structure a source separated organics management education and communication program beginning in Fall 2001, and consider the following activities:
 - (a) public meetings across the City, hosted by Ward Councillors, to promote participation; meetings will mainly take place as the implementation date for each ward approaches;
 - (b) Diversity Advocate role to assist in promotion to ethno-racial communities;
 - (c) participation of local Residents' Associations; and
 - (d) engagement of Waste Watchers.
 - (3) That the City engage the marketplace to provide the required treatment capacity in 2002 to manage the City's source separated organics prior to the commissioning of the City's new Dufferin Transfer Station anaerobic digestion facility (now under construction).
 - (4) That, beginning immediately, the Dufferin Transfer Station be expanded in phases through the addition of modular components, at a capital cost of \$25 million or less (depending on the volume of organics collected) to process residential source separated organics. The Commissioner of Works and Emergency Services is requested to undertake the required engineering design and report back to Council in Fall 2001.
 - (5) That the City terminate its consideration of proposed aerobic composting facilities other than for yard residuals.
 - (6) That the \$2.4 million put aside by Council this year for additional trucks be used to offset some of the costs of the necessary trucks for this program.
 - (7) That funding for the required kitchen residuals collection containers be attained through a benefiting assessment.
 - (8) That the Waste Diversion Organization be requested to actively consider the introduction of a supporting financial program for municipal-based collection, processing, and marketing of source separated organics.
 - (9) That City Staff report back in Fall 2001 on a source separated system for multi-residential buildings to begin in 2003.
- (B) Take It Back Program:
- (10) That a sub-committee of the Works Committee be established to look at the creation of a "Take It Back Program".

- (11) That the sub-committee's mandate be to establish a "Take It Back" program similar to the system in Ottawa.
 - (12) That the sub-committee be chaired by a member of the Works Committee.
 - (13) That the Toronto Environmental Alliance (TEA) and Target Zero be invited to participate.
 - (14) That \$20,000.00 be put aside from the 2001 funding available for diversion programs, to help with administration of the sub-committee.
 - (15) That the sub-committee be requested to report back by the Fall of 2001 for commencement in January 2002.
- (C) New and Emerging Technologies:
- (16) That City staff report to the Works Committee in Fall 2001 on a lease of land, possibly on the Gulf Oil site or another site on the Port Lands, to Enwave/Toronto Hydro for a potential energy facility.
 - (17) That staff be directed to enter into partnership with other GTA regions for the purpose of exploring new and emerging technologies. Councillor Balkissoon should be the lead for Council on this initiative.
 - (18) That staff be requested to come forward to the Works Committee twice a year with a report on the status of each of the three processes identified or any other diversion solutions.
- (D) Blue and Grey Boxes:
- (19) That City staff design and structure a bag program to supplement the existing Blue and Grey Box programs, including a potential partnership with the private sector, and report to Council in Fall 2001.
- (E) The Depot Program:
- (20) That City staff design and structure two city-wide garage sales or giveaways at the Exhibition or Downsview sites, whereby all residents of the City of Toronto would be invited to participate.
 - (21) That City staff design and structure a Mayor's proclamation for two "Amnesty Days" per year that would encourage residents to put their unwanted goods by the curb where they could be picked up by others.
 - (22) That City staff design and structure a cost-neutral curbside collection method for scrap metal.

- (23) That City staff review the possibility of an increase of styrofoam recycling and the possibility of adding it to the Blue Box.
 - (24) That City staff review the potential installation of woodbins at transfer stations to allow for the public to deposit used wood.
 - (25) That City staff be instructed to establish a list of items that can be collected at each transfer station depot.
 - (26) That City Staff report back on the above listed items in Fall 2001.
- (F) Home and Garden Composting:
- (27) That the City re-start truckload sales for backyard composters, even without the \$10.00 subsidy.
 - (28) That City staff report in September 2001 on:
 - (a) A phone campaign by volunteer Waste Watchers to contact everyone who has a backyard composter and offer tips, as well as asking about their interest in vermi-composting (composting with worms).
 - (b) Putting a compost display at Nathan Phillips Square to manage organic kitchen residuals generated at City Hall's Café on the Square.
 - (c) Putting one compost display in each Ward or community garden.
 - (d) Any other possible opportunities identified in the community meetings, as contained in Appendix L.
- (G) Leaf and Yard Residuals:
- (29) That the City keep its policy of requiring the use of rigid open-top containers or kraft bags for leaf and yard residuals.
- (H) Bag Limits:
- (30) That bag limits for residual garbage be lowered to five bags every two weeks in 2002 and four bags every two weeks in 2003.
 - (31) The issue of bag limits be reviewed by the Works Committee in January 2003 to see if there should be further reductions.

(I) The Provincial Government:

- (32) That the City encourage the provincial government to immediately establish a permanent Waste Diversion Organization to legislate on an urgent basis private sector financial contributions to fund the Blue Box program. Financing should be high enough to ensure that the program can operate at no cost to the City.
- (33) Failing the establishment of the WDO, that the City encourage the Province to follow the principles of the first two R's – reduce and reuse – and mandate a deposit-return system for beverage containers; and that City Council reaffirm its position that this system include the immediate implementation of a deposit-return for the Liquor Control Board of Ontario.
- (34) That the City call on the Province to review packaging regulations and guidelines. The goal of the review should be to reduce the amount of packaging that must be managed, and to bring in incentives for industry to make or use packaging that is readily recyclable and maximize recyclable content (such as PET and HDPE plastics), instead of products designed for disposal after one use.
- (35) That the City call on the Province to adopt the quality guidelines for compost set by the Canadian Council of Ministers of the Environment, and move to the Federal standard.

(J) The Federal Government:

- (36) That City Council call on the Federal Government to bring in an infrastructure program specifically designed to provide municipalities with funds to build recycling and composting plants.

(K) The Private Sector:

- (37) That the City actively pursue advertising revenues linked to Environment Days and corporate sponsorship of recycling programs.
- (38) That a full cost recovery program be instituted effective January 1, 2002 for the commercial sector solid resources collected by the City, with an incentive for recycling various materials.

(L) The Community:

- (39) That City staff report back in Fall 2001 on an educational/promotional campaign to encourage the widespread adoption of its diversion strategies.
- (40) That the City perform resource audits on litter collected, and pursue main offenders, particularly the fast-food industry, to provide support for a clean city, including the adoption of litter bins throughout the City.

(41) That the City analyze resource disposal practices on a community-by-community basis to identify the best communities, and develop an education program with the local Councillor's help to encourage the remaining communities to improve their performance.

(M) Agencies, Boards, Commissions and Departments:

(42) That every A, B, C and D submit to City Council by January 1, 2002, through the office of the Commissioner of Works and Emergency Services, a plan to achieve, as a minimum, Council's diversion targets.

(P) Separate Bill:

(43) That the City explore a number of options for billing residents for resource management, such as: creating an "environmental control bill" or "green bill" jointly with Toronto Hydro and Toronto Water; sending out in the same envelope as the property tax bill a separate tax bill dealing with garbage only; asking the Province to allow Council to make note of the garbage portion of the tax bill; or, continuing to make notes on the tax bill envelopes.

(Q) User Fee:

(44) That City Council not implement a user fee, at this time.

(45) That City staff report in January 2003 on a user fee, in conjunction with the bag limits report.

(R) Benefiting Assessment:

(46) That City staff report to Council in Fall 2001 on an appropriate container for an organics collection system for single family homes and a means of funding the containers, in addition to the benefiting assessment as proposed in Recommendation No. (7).

(47) That the City create a Resource Diversion Implementation Working Group as a sub-committee of the Works Committee. The Working Group, which will be chaired by the Chair of the Works Committee, will be mandated to:

- (a) work with City on implementing resource diversion policies and recommendations that are adopted by Council;
- (b) continue to meet on an ongoing basis with the public, the environmental NGO's and other stakeholders – at least until 2004 – to build support and momentum;
- (c) follow up on the implementation of diversion solutions in apartments and condominiums; and

- (d) shape a more detailed strategy for ensuring that Council's target of 100 percent diversion by 2010 is met.

The Works Committee also submits the following Appendix M of the Report of the City of Toronto Waste Diversion Task Force 2010, "Staff Recommendations to Waste Diversion Task Force 2010":

(Communication dated June 14, 2001, from the
Commissioner of Works and Emergency Services addressed to
Councillor Betty Disero, Co-Chair, Waste Diversion Task Force 2010)

Attached to this cover letter are a series of abbreviated staff reports prepared for the Waste Diversion Task Force 2010, as requested by the Works Committee and City Council.

Under each Committee or Council request, we have provided a reply that includes a "response" and associated "recommendation(s)" from the Commissioner of Works and Emergency Services. We have not provided our replies in the standard Works Committee format in order to provide succinct feedback to the Task Force.

As per discussions with the Task Force, we recommend that the enclosed reports be attached as "Appendix M" of Volume II of the Task Force, and brought forward for consideration by the Works Committee at its special meeting of June 21, 2001, in conjunction with the recommendations of the Task Force.

Mr. Lawson Oates of Solid Waste Management Services is in a position to respond to any questions you may have regarding the enclosed reports. He can be reached at (416) 392-9744.

Staff Reports to Waste Diversion Task Force 2010

June 14, 2001

Toronto City Council and Works Committee referred numerous solid waste management matters to the Waste Diversion Task Force 2010 with accompanying requests to the Commissioner of Works and Emergency Services to provide staff reports. Listed below are the matters referred to the Task Force with requests for staff reports and the Commissioner's responses in the form of abbreviated reports.

Item No. 1

In connection with a report dated January 25, 2001, from the Commissioner of Works and Emergency Services that responded to a series of directives and requests for information regarding solid waste collection systems and solid waste diversion (titled "Solid Waste Diversion - Responses to Works Committee"), the Works Committee, at its meeting of February 7, 2001:

"requested that the Commissioner of Works and Emergency Services work with Councillor Layton, the local Business Improvement Areas, businesses and local Councillors, to develop a detailed proposal for an Organic Food Waste Program, and report to the Waste Diversion Task Force 2010 on the program design and costs."

Response:

A proposal for a commercial Organic Food Waste Program is being developed as part of an integrated waste, recycling and organic harmonization plan for the commercial sector. A staff report that addresses this matter is being submitted to the June 21, 2001 Special Works Committee meeting. The report, titled "Garbage Service Fee Harmonization and Enhanced Diversion Initiatives for the Commercial Sector", addresses the separate collection of business-related food waste including a recommendation that all such food waste material be banned from municipally collected commercial garbage.

A further report will be submitted to the Task Force, linked to the Works Committee's deliberations regarding the staff report cited in the previous paragraph.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item No. 2

In connection with a report dated January 26, 2001, from the Commissioner of Works and Emergency Services, titled "Proposed Waste Diversion Pilot Projects for 2001", the Works Committee at its meeting of February 7, 2001:

"referred the aforementioned report back to the Commissioner of Works and Emergency Services to report back, through the Waste Diversion Task Force 2010, on implementation of the various methods and a specific geographic area, taking into consideration the comments raised by the Toronto Civic Employees' Union – CUPE Local 416."

Response:

The initial intent of the pilot projects was to obtain information with respect to the potential for increasing waste diversion. Specifically:

- (1) What is the most effective way for Toronto residents to set out organic kitchen waste at curbside so that it can be collected separately for diversion?; and
- (2) Can organic kitchen waste be co-collected with other waste streams to reduce the impact on collection costs?

We do not anticipate that additional pilots will occur in 2001-2002. A full-scale source separated organics collection and processing implementation schedule is addressed in the report of the Waste Diversion Task Force 2010.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item No. 3

In connection with a report dated March 12, 2001, from the Commissioner of Works and Emergency Services, titled "Improving Waste Diversion in Apartments", the Works Committee at its meeting of March 28, 2001, requested the Commissioner of Works and Emergency Services to:

"report to the Waste Diversion Task Force 2010 on the resources required to do a waste audit for all apartments."

Response:

A report dated April 27, 2001, was submitted to the Task Force by the Commissioner of Works and Emergency Services, and copied to all members of the Works Committee. It advised that a comprehensive waste audit of this nature is unnecessary because a waste composition study was completed in February 2001 and provides the type of information contemplated in the Committee's request.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item No. 4

Toronto City Council at its meeting of April 23 to May 1, 2001, adopted Recommendation No. (G)(31) of the Policy and Finance Committee and referred the motion to the Waste Diversion Task Force 2010. The motion requested the Commissioner of Works and Emergency Services to:

"report on implementation strategies and recommendations regarding application of user fees effective 2002 for waste collection from residences and apartment buildings as well as on the 2001 implementation of user fees or charges for School Boards, Agencies, Boards or Commissions."

Response:

Due to the complexity of the issues involved in the above motion, we are presenting our responses and recommendations in four sections: (i) single-family residences and multi-unit residential buildings (i.e., townhomes, apartments and condominiums); (ii) School Boards;

(iii) City Departments; and (iv) Agencies, Boards and Commissions. We are also including in a fifth section policy-related recommendations in connection with the provision of disposal services to non-profit organizations currently assisted by the City.

(i) Single-Family Residences and Multi-Unit Residential Buildings

Introducing a solid waste management fee for single-family residences and multi-unit residential buildings can have a two-fold impact. On the one hand it can lead to an increase in diversion as a result of introducing a financial incentive by levying a charge for disposal and providing for recycling and composting through the tax base, with no direct charge to the system user.

On the other hand, it can provide a funding source in the form of a separate bill containing the service fee, to offset the significant loss of private sector revenue resulting from the closure of the City's Keele Valley Landfill Site, scheduled for December 2002, and the higher waste management costs for contracted disposal capacity in Michigan. The alternative is to place increased demands on the tax base to financially support the City's solid waste management diversion programs and residual disposal costs.

To this end, we have identified three funding options:

- (1) tax-based funding for recycling and disposal (status quo);
- (2) introduction of service fees for both recycling and disposal; and
- (3) introduction of a service fee for disposal and tax-based funding for recycling.

However, before firm recommendations can be brought forward, a consultation process is recommended in order to discuss with stakeholders:

- the reasons for increases in solid waste management costs;
- harmonization of services and policies;
- the various funding options available, as outlined above;
- the types of service fees that could be introduced (for example, per bag charges or an annual or monthly bill); and
- the amounts to be levied, recognizing the divergent types of housing stock in the City and associated generation rates.

Recommendations:

The Commissioner of Works and Emergency Services recommends that:

- (1) the Commissioner of Works and Emergency Services be requested to undertake a consultation process regarding the establishment of a service fee for solid waste management with stakeholders such as apartment and condominium management associations, ratepayers' associations, condominium boards, members of the public, and other self-identified stakeholders; and
- (2) the Commissioner of Works and Emergency Services, the Chief Financial Officer, and the City Solicitor be requested to submit a report to the January 2002 meeting of the Works Committee, and subsequently to the Policy and Finance Committee, containing

recommendations for the establishment of a residential service fee for solid waste management services.

(ii) School Boards:

The Municipal Act does not require the City to manage waste received by provincially mandated/funded bodies and institutions, including the Toronto District School Board (“TDSB”) and the Toronto Catholic District School Board (“TCDSB”). However, these organizations can have their waste managed by the City upon mutual agreement by both parties.

Currently, SWM Services provides waste disposal services for all public schools in Toronto (and some private schools), with collection services provided to approximately 70 percent of the schools. Private sector service providers under contract to the School Boards deliver solid waste from the remaining 30 percent directly to the City’s transfer stations. We estimate that recycling collection services are provided to approximately 80 percent of the 934 schools in Toronto.

In 2000, the City collected approximately 10,000 tonnes of solid waste generated by schools under the two School Boards. An additional 14,000 tonnes of solid waste was delivered directly to our transfer stations by the School Boards or their contractors, for a total of 24,000 tonnes in 2000. Of this amount the TDSB generated approximately 20,500 tonnes and the TCDSB generated approximately 3,500 tonnes. An estimated 7,500 tonnes of recyclable material was collected in 2000 from public schools in Toronto.

Based on a policy of cost recovery for collection, transfer, haulage, disposal, and associated administration and debt costs, the City could realize a cost recovery of approximately \$2.18 million per year. This is based on the recovery of the following service costs.

School Boards

<u>10,000 tonnes collected by the City</u>	<u>Service Cost</u>	<u>14,000 tonnes delivered by the School Boards</u>	<u>Service Cost</u>
Collection	\$50/tonne	Collection	N/A
Transfer	\$7/tonne	Transfer	\$7/tonne
Haulage to Landfill and Disposal	\$52/tonne	Haulage to Landfill and Disposal	\$52/tonne
Administration/Debt Costs	\$11/tonne	Administration/Debt Costs	\$11/tonne
Sub-total	10,000 x \$120 = \$1.2 million	Sub-total	14,000 x \$70 = \$980,000.00
Total	\$2.18 million		

At this time, these service costs are under review and will be refined through the Implementation Plan (in response to the recommendations of the Waste Diversion Task Force 2010), which is scheduled to be completed in the Fall of 2001.

The revenues received through a policy of cost recovery for disposal related services would be offset by maintaining a policy of no-charge recycling in order to provide an economic incentive for diversion, currently estimated at \$532,500.00 per year (based on an aggregated cost of \$71.00 per tonne for Blue and Grey Box service and leaf and yard waste composting, currently estimated at 7,500 tonnes per year, net after revenues).

However, we anticipate that this would substantively increase under the proposed policy. In order to minimize the new service fee and maximize recycling, the School Boards will be required to purchase additional approved collection containers as a condition of the receipt of service. Staff of Solid Waste Management Services are assisting in the process of identifying sponsors to assist in the funding of the purchase.

The continued inclusion of the School Boards within the City's solid waste management system is important from the perspective of encouraging positive behavioral development of students in the fields of recycling and composting. It has also been shown through our outreach and communications programs that students transmit information about environmental programs to their parents and promote participation, resulting in a higher diversion rate.

We are therefore recommending that the no charge Blue and Grey Box service and leaf and yard waste composting program that are currently provided by the City to the School Boards continue, in order to provide a financial incentive to promote and enhance diversion for an initial five-year

period. Provision of other recycling programs would be reviewed on a case by case basis. We also recommend that these policies extend to private schools.

City Council has established a charge of \$162,500.00 for the collection and disposal of solid waste generated by the TDSB and TCDSB from September 1, 2001 to December 31, 2001. This charge represents only a percentage of the actual cost the City will incur. Council has also established a charge of \$12,500.00 for recycling during the same time period. We recommend that full cost recovery for disposal related services be initiated on January 1, 2002, and that the current charge for recycling be removed, as it is contrary to the goal of increasing diversion.

Recommendations:

The Commissioner of Works and Emergency Services recommends that:

- (1) as of January 1, 2002, all solid waste collected or received for disposal by the City of Toronto from the Toronto District School Board and the Toronto Catholic District School Board and private schools operating in the City of Toronto be subject to service charges based on full cost recovery;
- (2) the City of Toronto provide the Toronto District School Board, the Toronto Catholic District School Board, and private schools located in the City of Toronto with continued access to the City's current Blue and Grey Box recycling service and leaf and yard waste composting program at no charge, other than the provision of approved collection containers and associated in-house management costs, and be subject to review after a period of five years commencing January 1, 2002; and
- (3) the current charge to the School Boards of \$12,500.00 for recycling from September 1, 2001 to December 31, 2001, be withdrawn.

(iii) City Departments:

City Departments, as administrative divisions of the City are obviously subject to the direction of Council. There are 330 departmental facility sites. In 2000, City Departments disposed approximately 46,000 tonnes of solid waste, which is attributed as follows:

City Departments:

<u>Department</u>	<u>Tonnage Disposed in 2000</u>
Corporate Services	1,252 tonnes
Community and Neighbourhood Services	158 tonnes
Economic Development, Culture and Tourism	2,988 tonnes
Works and Emergency Services Comprised of:	41,659 tonnes (WES total)
Solid Waste	17,997 tonnes
Transportation	7,638 tonnes
Water and Waste Water	16,019 tonnes
Ambulance and Fire	5 tonnes
Total	46,057

Based on a policy of cost recovery for collection, transfer, haulage and disposal, and associated administration and debt costs, Solid Waste Management Services could realize a cost recovery of approximately \$1.4 million per year. The solid waste tonnage attributed to Solid Waste Management Services is not factored into the cost recovery calculation because it is part of internal operations. Likewise, solid waste tonnage received from Water and Wastewater Services is not factored into the cost recovery calculation because a cost recovery policy is already in place. The cost recovery calculation also reflects the direct delivery to our transfer stations of a large percentage of the solid waste generated by Departments, therefore negating the application of a collection charge by Solid Waste Management Services.

The revenues accrued through a policy of cost recovery would be offset by maintaining a policy of no-charge recycling in order to provide an economic incentive for diversion, estimated currently at 9,000 tonnes per year at a budget cost of approximately \$639,000.00 per year (at \$71.00 per tonne, net after revenues).

In addition, SWM Services collects approximately 60,000 tonnes per year of waste and recyclables from City-owned public housing, as part of our residential collection service. This report does not carry a recommendation to initiate charging for this tonnage, as it is residential in origin. Financial policies associated with the management of waste received from City-owned public housing will be the subject of a future report that addresses management of solid waste that is collected from residents.

(iv) Agencies, Boards and Commissions:

Agencies, Boards and Commissions (“ABCs”) are separate legal entities from the City and generally have jurisdiction over the management of their own affairs. The City of Toronto Act (No. 2) does provide, however, that the City may establish general policies to be followed in the operation, management or maintenance of particular ABCs. In other instances, the City may

exert control over certain ABCs where the City is the sole shareholder. However, the situation is different for each ABC depending on how it was incorporated, although as a matter of practice and input to the budget process, ABCs may simply comply with City policies.

In 2000, the City’s ABCs generated approximately 31,000 tonnes of solid waste. Based on a policy of cost recovery for collection, transfer, haulage and disposal, and administration and debt costs, Solid Waste Management Services could realize a cost recovery of approximately \$2.2 million per year. A high percentage of the solid waste generated by the ABCs is delivered directly to our transfer stations, and therefore does not require collection by Solid Waste Management Services. This is reflected in the cost recovery estimate of \$2.2 million.

Listed below are the solid waste tonnages generated for disposal by the City’s ABCs in 2000.

ABCs

Organization	Tonnage Disposed in 2000
Toronto Transit Commission	25,718 tonnes
Toronto Hydro Electric Commission	269 tonnes
Exhibition Place	2,786 tonnes
Toronto Police Services Board	9 tonnes
Toronto Zoo	304 tonnes
Toronto and Region Conservation Authority	1,386 tonnes
Centres for Performing Arts	10 tonnes
Library Board	104 tonnes
Parking Authority	395 tonnes
Historical Board	36 tonnes
Black Creek Pioneer Village	12 tonnes
Total	31,029 tonnes

The City’s ABCs have several “in-house” diversion programs in place, including:

- the TTC’s bus recycling program;
- Corporate Services’ office-based recycling programs;
- the Zoo’s animal waste composting program; and

- the Toronto and Region Conservation Authority's diversion programs for cans/bottles, cardboard, paper, polystyrene, wood, tires, waste oil, food waste and scrap metal.

These programs should be continued and expanded where possible.

Recommendations:

The Commissioner of Work and Emergency Services recommends that:

- (1) City Council establish a policy whereby all solid waste generated for disposal by the City's Agencies, Boards, and Commissions, and Departments be managed by the City's Solid Waste Management Services Division, in order to avoid additional disposal capacity planning and tendering costs, potentially higher disposal costs and additional risk, and direct or request, as applicable, the Agencies, Boards and Commissions to adhere to the policy;
- (2) each Agency, Board, Commission, and Department of the City of Toronto be requested to submit to City Council for review and approval a comprehensive three-year solid waste diversion program by January 1, 2002, through a consolidated report to be submitted by the Commissioner of Works and Emergency Services;
- (3)(i) as of January 1, 2002, all solid waste collected and/or received for disposal by the City of Toronto's Solid Waste Management Division from the Agencies, Boards, Commissions and Departments of the City of Toronto, be subject to an intra-departmental charge-back (or other appropriate means of billing) based on a full cost recovery, with the exception of tonnage collected and disposed from residential units of Community and Neighbourhood Services; and
- (3)(ii) the City of Toronto's Solid Waste Management Services Division provide Agencies, Boards, Commissions and Departments with continued access to its existing Blue and Grey Box recycling service and leaf and yard waste composting program at no charge, other than the provision of approved collection containers and associated in-house management costs, and be subject to review after a period of five years commencing January 1, 2002.
- (v) Charitable Organizations:

The City provides no charge disposal services for eleven Community Services Organizations. In total, approximately 6,000 tonnes of solid waste are received annually from these organizations. The majority of the waste received is generated by three organizations: Goodwill Services (3,139 tonnes per year); Salvation Army (1,417 tonnes per year); and the Daily Bread Food Bank (774 tonnes per year). The other organizations are: St. Vincent De Paul; Yonge Street Mission; The Bob Rumball Centre for the Deaf; Kennedy House Youth Services; Planet Aid Canada; Oasis Addiction Recovery Society; Metropolitan Toronto Habitat for Humanity; and the Children's Aid Society.

If the City charged for the residual solid waste received from these organizations, it would represent a cost recovery of approximately \$450,000.00 per year. A high percentage of the

residual solid waste generated by these organizations is delivered directly to our transfer stations, thereby negating a collection service. This has been factored into the cost recovery calculation. However, as a result of their diversion efforts, approximately 25,000 tonnes of material is diverted from landfill, which, if it was otherwise collected from residents at curbside, represents cost saving of approximately \$3 million per year.

It is therefore recommended that the Community Service Organizations, currently assisted by the City through the provision of no-charge disposal, continue to receive disposal at no charge in order to assist them in their efforts to reuse and recycle materials that may otherwise be disposed and to support their mandates to assist citizens through employment and needed services.

We are also recommending that organizations receiving no-charge disposal submit to the City, through the Commissioner of Works and Emergency Services, a solid waste management plan based on a two-year cycle, which would include a request to continue no-charge disposal services from the City.

Each plan would be required to contain the following components:

- program description, mandate, and diversion policies (including goals and objectives);
- identification of tonnages of materials diverted through reuse or recycling, with a requirement to demonstrate a minimum 50 percent diversion rate;
- description of the management of residual materials through secondary diversion (recycling and/or composting);
- identification of residual volumes sent to disposal;
- request to continue to receive no charge disposal service for residuals; and
- a submission deadline of January 1, 2002, linked to potential no-charge disposal over the course of the subsequent two years, with the establishment of a two-year cycle thereafter.

Solid waste received from Community Service Organizations will be monitored to ensure that the tonnages are consistent with tonnages received in preceding years. Any significant anomalies will be reported to the Works Committee.

Recommendations:

The Commissioner of Works and Emergency Services recommends that:

- (1) the City of Toronto maintain its no-charge solid waste disposal policy for Community Service Organizations currently receiving this service, subject to the provisions contained in Recommendation No. (2); and
- (2) by January 1, 2002, Community Service Organizations currently approved for no-charge disposal of residual solid waste be required to re-apply to the City of Toronto for this

service, based on the provision of service conditions cited in this report, through the Commissioner of Works and Emergency Services.

Item No. 5

Toronto City Council at its meeting of April 23 to May 1, 2001, adopted Recommendation No. (G)(32) of the Policy and Finance Committee and referred the motion to the Waste Diversion Task Force 2010. The motion requested the Commissioner of Works and Emergency Services to:

“report to the Works Committee by the fall of 2001, with a suggested policy framework for considering pilot projects related to emerging or alternative waste management technologies that will allow for such programs to be reviewed relative to both the Corporation’s diversion targets as well as the City’s ability to afford them.”

Response:

We are proceeding at a staff level to discuss a potential GTA-wide collaborative approach to the field testing of emerging or alternative waste technologies in order to maximize the number of technologies investigated and minimize costs. A status report will be submitted in the fall of 2001, as requested.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item 6

Toronto City Council as its meeting of April 23 to May 1, 2001, adopted Recommendation No. (G)(33) of the Policy and Finance Committee and referred the motion to the Waste Diversion Task Force 2010. The motion requested the Commissioner of Works and Emergency Services to report:

“prior to the 2002 Budget deliberations on the ability and cost of implementing weekly organic pick-up in addition to the weekly recycling pick-up.”

Response:

The cost of a weekly organic pick-up (i.e., source separated organics) is being prepared by staff as part of the “business case” analysis as requested by the Task Force. Please see associated section in Volume I of the Task Force report.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item 7

Toronto City Council at its meeting of April 23 to May 1, 2001, adopted, with amendment, Recommendation No. (G)(34) of the Policy and Finance Committee. The amended recommendation reads:

“that \$2.4 million be held as a reserve in the Fleet Capital Budget for the purchase of recycling vehicles, and such funds not be released until such time as the Commissioner of Works and Emergency Services and the Waste Diversion Task Force 2010 provides a report to Council through the Works Committee, on the best initiatives to implement waste diversion.”

Response:

The expenditure of the \$2.4 million vehicle reserve is addressed in the Task Force’s report, in connection with the introduction of a source separated organics program.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item No. 8

Toronto City Council at its meeting of April 23 to May 1, 2001, adopted Motion No. (G)(8), which requested the Commissioner of Works and Emergency Services to:

“submit a report to the Waste Management Task Force on methods to measure the cleanliness of small business strips in the City of Toronto.”

Response:

Solid Waste Management Services operates a number of programs aimed at keeping the City's streets and sidewalks clean. This includes litter collectors, litter and recycling bins, and sidewalk sweepers/litter vacuums. By-law enforcement officers are also employed to check on infractions that affect the cleanliness of the City such as illegal dumping of garbage. The 39-CLEAN (392-5361) hotline number allows residents to call and report litter in certain areas.

The quantity and type of litter collected, the number of calls to the clean-up hotline and the number of by-law infractions assist us in assessing the cleanliness of the City. To measure the cleanliness of specific business strips, it would be necessary for staff to visit each location, visually assess the situation including taking photographs, and perhaps count the pieces of litter in a certain measured area (e.g., 200 square meters). We could also work with the local BIA's to ask their assistance in assessing the amount of litter in their area.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

Item No. 9

Toronto City Council at its meeting of April 23 to May 1, 2001, adopted Recommendation No. (G) (6) (10), which requested the Commissioner of Works and Emergency Services to:

“report to the Waste Diversion Task Force 2010 for a report thereon to Works Committee for its meeting scheduled to be held on June 6, 2001, on the feasibility of selling the plastic garbage bins on Environment Days for implementation in 2002 and its impact on the 2002 budget.”

Response:

Leaves and yard waste are collected in kraft bags specifically designed for leaf and yard waste or in rigid open containers such as bushel baskets and garbage cans with the lid off. Residents also have the option of purchasing special plastic reusable yard waste bins at our Environment Days. The bins are distributed on a cost recovery basis; the City purchases the bins for \$6.00 each and sells them to residents for \$6.00. The bins are green and are 21 inches high, 19 inches long, and 16 inches wide. An average of 110 bins are being sold per Environment Day so far this year. We are planning to continue to sell these bins on a full cost recovery basis in 2002, and will likely sell them at a number of our solid waste management facilities in addition to Environment Days.

Recommendation:

The Commissioner of Works and Emergency Services recommends that this report be received for information.

The Works Committee reports, for the information of Council, having also had before it during consideration of the foregoing matter a communication (June 21, 2001) from Mr. Brian Cochrane, President, Toronto Civic Employees' Union, CUPE Local 416, in support of the Waste Diversion Task Force Report and Recommendations; commending Councillor Betty Disero on the consultative process used to arrive at the Task Force recommendations; and urging the City to put in place a comprehensive education program for City workers that complements the public education program planned, and to work with the Union and its membership to achieve increased efficiencies with the Solid Waste Program in all areas of the City.

Councillor Betty Disero, Co-Chair, Waste Diversion Task Force 2010, gave a presentation to the Works Committee on the recommendations of the Task Force.

The following persons appeared before the Works Committee in connection with the foregoing matter:

- Mr. Blair McArthur, Vice-President, Miller Waste Systems;
- Mr. Rob Cook, Executive Director, Ontario Waste Management Association;
- Mr. Gord Perks, Toronto Environmental Alliance;
- Mr. Al Metauro, Metro Waste Paper Recovery;
- Mr. Brian Cochrane, President, Toronto Civic Employees' Union, CUPE Local 416; and
- Mr. Rod Muir, resident, and filed a submission with respect thereto.

(Copies of Volume 1 and II of the Report of the City of Toronto Waste Diversion Task Force 2010, entitled "Beyond Landfill: A Diverting Future", have been forwarded to all Members of Council, and a copy thereof is on file in the office of the City Clerk, City Hall.)

(City Council at its meeting on June 26, 27 and 28, 2001, had before it, during consideration of the foregoing Clause, a confidential report (June 27, 2001) from the Commissioner of Works and Emergency Services, such report to remain confidential in accordance with the provisions of the Municipal Act, given that it concerns matters of the security of property of the municipality or local board, save and except the following recommendations embodied therein:

Recommendations:

It is recommended that:

- (1) the Commissioner of Works and Emergency Services be authorized to conduct a due diligence in respect of the proposal by Canada Composting Inc. for an assignment to it and its partners, BTA, Trow Consulting Engineers Ltd. and W. S. Nicholls Construction Inc. of the Design-Build Contract for the Dufferin Mixed Waste Recycling and Organics Processing Facility and, in addition, negotiate appropriate business terms for the operation of the facility; and,*
- (2) the Commissioner of Works and Emergency Services report back to the July 2001 meeting of Council on the results of the due diligence and negotiations and, as well, on the details on the process for expansion of the facility.)*

(City Council also had before it, during consideration of the foregoing Clause, a communication (June 24, 2001) from Mr. Donald A. Sullivan, B.A., M.Ed., submitted by Councillor Betty Disero, commending the Mayor and staff who prepared the report, entitled "Waste Diversion Task Force 2010 Report", and submitting a set of recommendations for consideration.)