

Re: PW 30.4 Addition of New Materials to the City's Waste Diversion Programs (Adapt Policy)

Date: June 12 2018

To: Members of the Public Works & Infrastructure Committee

The Toronto Environmental Alliance wishes to express our support for the proposed Waste Diversion Adapt Policy, and to urge the Committee to consider further actions that can be taken to create a circular economy and zero waste future for Toronto.

Complicated and new product and packaging types, combined with waste sorting 'rules' that differ between home and work, and between municipalities, is leading to resident confusion and contributing to contamination in Toronto's Blue and Green Bins. A key cause of this confusion and contamination is that companies are promoting and labelling their products as recyclable or compostable, even when they are not accepted in Toronto's Blue or Green Bins. This causes frustration with residents, and increases costs for the City - contamination is projected to cost \$9M in 2018 alone.

The proposed Adapt policy outlines a fair and transparent method to respond to companies that want to add their materials to Toronto's diversion system, and avoids the additional cost of contamination. The policy provides a clear path forward for producers to test materials, evaluate costs and educate the public. Applied well, this new policy approach would allow for increased diversion without increased cost to the ratepayers of Toronto.

However, we would like to point out that the Adapt policy is only one step in addressing problem packaging and disposable products and the related environmental and financial costs in Toronto. Some problematic materials should be addressed in other ways to reduce their use - for example bans, fees or incentives.

The City should also consider penalties that can be imposed on producers that knowlingly advertise and label their product in a way that contributes to contamination in Toronto's Blue and Green Bins. Considering the system of inspections, warnings and fines imposed on single family and multi-residential customers found contaminating the Blue Bin, it is an issue of fairness that the City also look at penalties for producers that contribute to Blue Bin contamination.

The proposed policy for how to add new materials to the City's Waste Diversion programs is a key first step for the City to increasing diversion and to address the rising environmental and financial costs of contamination in Toronto's blue and green bins. We urge this Committee to consider further actions that address problematic packaging and products that contaminate Toronto's diversion streams and pollute our environment.

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