





Interest Group Workshops Summary Report

**City of Toronto Long-term Waste
Management Strategy Update – Phase Two**

City of Toronto

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→ The Power of Commitment

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Contents

1.	Introduction	1
2.	Workshops Overview	1
3.	Summary of Input	1
3.1	Question and Answer Sessions	5
3.2	Small Group Discussions: Waste Strategy Update	7
3.2.1	Environmental, Social Service, and Community Groups	8
3.2.2	Waste Industry	10
3.2.3	Businesses and Business Associations	11
3.2.4	Residential Associations, Property and Facilities Management	13
3.2.5	Indigenous Community Organizations	14
3.3	Small Group Discussion: Residual Waste Management	15
3.3.1	Environmental, Social Service, and Community Groups	15
3.3.2	Waste Industry	17
3.3.3	Businesses and Business Associations	19
3.3.4	Residential Associations, Property and Facilities Management	20
3.3.5	Indigenous Community Organizations	21

Table Index

Table 1	Discussion Themes and Guiding Questions – Waste Strategy Update	2
Table 2	Discussion Themes and Guiding Questions – Residual Waste Management	3
Table 3	Discussion Themes and Sub-Themes – Waste Strategy Update	8
Table 4	Discussion Themes and Sub-Themes – Residual Waste Management	15

1. Introduction

This report summarizes the interest group workshops conducted virtually on June 6, 9, 12 and 13, 2025, during Phase Two of the City of Toronto's Long-term Waste Management Strategy Update (Waste Strategy Update). It provides an overview of the five workshops and a summary of the input shared by participants from environmental, social service, and community groups; waste industry; businesses and business associations; residential associations, property and facilities management; and the Indigenous community organizations.

2. Workshops Overview

Interest group workshops were a key aspect of the Waste Strategy Update engagement strategy. These workshops provided a space for participants to learn about the Waste Strategy Update, share their opinions on the program options and the evaluation criteria used to assess them, and provide their perspectives on the future of waste management in the city, specifically, how we manage our garbage after we reduce, reuse, and recycle. The insights from participants, along with information gathered through other consultation activities, will be used to create an updated 10-year Waste Strategy implementation plan and inform the consideration of energy-from-waste (incineration) and landfilling as potential long-term options in the City's Residual Waste Management Work Plan for managing garbage.

Each of the five workshops included two presentations – one on the Waste Strategy Update and another on the Residual Waste Management Work Plan. Each presentation was followed by a question-and-answer session, which was followed by small group discussions covering the proposed options for the Waste Strategy Update and the evaluation criteria, as well as long-term residual waste management approaches, planning priorities, and environmental and community impacts.

Community members and organizations from the following five interest groups were invited by the City to participate in the workshops:

- Workshop 1 (June 6, 2025): Environmental, Social Service, and Community Groups
- Workshop 2 (June 9, 2025): Waste Industry
- Workshop 3 (June 12, 2025): Businesses and Business Associations
- Workshop 4 (June 13, 2025): Residential Associations, Property and Facilities Management
- Workshop 5 (June 13, 2025): Indigenous Community Organizations

A sixth workshop was planned with Accessibility Organizations but was cancelled due to low registration.

3. Summary of Input

Participants across all five workshops shared insights on two key focus areas: the City's Waste Strategy Update and the long-term options from the Residual Waste Management Work Plan. While the structure of engagement was consistent, the discussion questions in the first focus area (the Waste Strategy Update) were tailored to each group. Table 1 below describes the discussion themes and guiding questions explored in each workshop in this focus area.

Table 1 *Discussion Themes and Guiding Questions – Waste Strategy Update*

Workshop Group	Discussion Themes	Questions
Environmental, Social Service, and Community Organizations	<ul style="list-style-type: none"> – Program Categories and Options – Evaluation Criteria – Role in Strategy Implementation – Key Issues to Address 	<ul style="list-style-type: none"> – Do you have any comments on program categories/options? Did we miss anything? Are there any examples of waste management in other areas you would like to see replicated? – When evaluating the various options for inclusion in the Waste Strategy Update, what evaluation criteria are most important to your organization? – What role would you like to see your organization play in the updated Waste Strategy? – What is the main issue that you would like to see addressed in the Waste Strategy Update?
Waste Industry	<ul style="list-style-type: none"> – Program Categories and Options – Evaluation Criteria – Innovative Technologies for Consideration – Emerging Trends and Industry Insights 	<ul style="list-style-type: none"> – Do you have any comments on program categories/options? Did we miss anything? Are there any examples of waste management in other areas you would like to see replicated? – When evaluating the various options for inclusion in the Waste Strategy Update, what evaluation criteria are most important to your organization? – What type(s) of innovative waste management technology could the City consider? – What waste industry trends or issues should the City consider as part of the Waste Strategy Update?
Businesses and Business Associations	<ul style="list-style-type: none"> – Program Categories and Options – Evaluation Criteria – Waste Types and Diversion Challenges – Business-Led Waste Reduction and City Support 	<ul style="list-style-type: none"> – Do you have any comments on program categories/options? Did we miss anything? Are there any examples of waste management in other areas you would like to see replicated? – When evaluating the various options for inclusion in the Waste Strategy Update, what evaluation criteria are most important to your organization? – What types of waste does your business generate that most frequently ends up in landfill? – Does your business offer any services that directly reduce or divert waste? How could the City support these efforts?
Residential Associations, Property and Facilities Management	<ul style="list-style-type: none"> – Program Categories and Options – Evaluation Criteria – Barriers to Waste Reduction and Diversion – Supports to Improve Waste Reduction and Diversion in the Multi-Residential Sector 	<ul style="list-style-type: none"> – Do you have any comments on program categories/options? Did we miss anything? Are there any examples of waste management in other areas you would like to see replicated? – When evaluating the various options for inclusion in the Waste Strategy Update, what evaluation criteria are most important to your organization? – What barriers/challenges do your community members face when diverting and/or reducing waste? – What type of support or education would help your community members improve waste management, specifically waste reduction and diversion, in buildings?
Indigenous Community Organization	<ul style="list-style-type: none"> – Integrating Indigenous Values in Waste Planning – Program Categories and Options – Barriers to Waste Diversion – Role of Indigenous Organizations and Knowledge Holders 	<ul style="list-style-type: none"> – How can Indigenous values be meaningfully integrated into long-term waste planning and decision-making? – Do you have any comments on any of the program categories/options? – What are the barriers/challenges your community members face when diverting and/or reducing waste? – What role would you like to see Indigenous organizations or knowledge holders play in implementing the Waste Strategy Update?

The second portion of each workshop focused on long-term options to managing residual waste – garbage that remains after reduction, reuse, and recycling. This session was consistent across all workshops, with participants

responding to the same set of discussion themes and questions. Table 2 below describes the themes and guiding questions explored in each workshop in this focus area.

Table 2 Discussion Themes and Guiding Questions – Residual Waste Management

Workshop Group	Discussion Themes	Questions
<ul style="list-style-type: none"> – Environmental, Social Service, and Community Organizations – Waste Industry – Businesses and Business Associations – Residential Associations, Property and Facilities Management – Indigenous Community Organization 	<ul style="list-style-type: none"> – Preferred Residual Waste Management Approach – Long-term Planning Priorities – Reducing Environmental and Community Impacts 	<ul style="list-style-type: none"> – While the City remains committed to reducing and diverting waste, do you have a preference between landfilling residual waste (garbage) or using an alternate method like energy-from-waste (incineration) technologies? Why? – What key priorities should the City consider when planning for the long-term management of its waste? – How can the City ensure it reduces impacts from the management of residual waste on the environment, human health, and neighbouring communities?

Key takeaways from participant input are summarized below, organized by the two focus areas introduced above:

Key Takeaways from input on Waste Strategy Update

Participants expressed a strong interest in enhancing waste diversion and supporting community-led initiatives. They identified the importance of ensuring equitable access to waste services, particularly by addressing service gaps in multi-residential buildings, including low participation in the City's Green Bin program and limited access to organics diversion in privately serviced buildings. They also emphasized the need to improve access to reuse programs and support culturally relevant education in underserved communities. There was emphasis laid on the importance of upstream solutions, transparent data sharing, and infrastructure improvements, particularly in multi-residential buildings, to meet long-term waste management goals. Additional themes from the workshops that were discussed included:

- Equitable access to waste services is a priority, especially for marginalized communities, condominium dwellers without cars, and residents in high-rise buildings.
- Strong support for expanding reuse initiatives such as repair cafés and bulky item reuse services and aligning the City's Single-Use and Takeaway Items Reduction Strategy (SUTI) with schools and hospitality venues.
- Infrastructure improvements are needed in multi-residential buildings, including addressing challenges with outdated single-chute systems and malfunctioning tri-sorters, improving hazardous waste disposal, and applying design guidelines for new developments.
- Education and outreach must be culturally relevant, sustained, and supported by real-time data sharing to drive behaviour change.
- City leadership is needed on upstream policy, enforcement in privately serviced buildings, and clarity on authority to mandate actions like reusable packaging or building design standards.
- Evaluation criteria should prioritize social and environmental outcomes, with clear definitions of 'social' that include community health and environmental justice.
- Suggestions for innovation included deposit return systems and smart bin technologies, while caution was advised around chemical recycling based on past failures.
- Businesses expressed interest in licensing for compostables, improved processing infrastructure, and partnerships with the City to enhance recycling outcomes.
- Challenges include construction waste, textile diversion, and battery/e-waste collection in buildings with private waste collection, particularly across the Industrial, Commercial and Institution (IC&I) sector.

- Public mistrust in the waste system is a barrier; transparent, positive data (e.g., composting success rates) can help build confidence.
- Community-based solutions such as composting in gardens, food rescue, and school-led diversion programs are strongly supported.

Key Takeaways from input on Long-term Residual Waste Management Options

There were a wide range of perspectives presented on the City's long-term residual waste disposal options. While some participants supported energy-from-waste (incineration) as a modern alternative to landfilling, others raised concerns about its environmental, health, and social impacts. Across all groups, there was a consistent call for prioritizing waste reduction, improving diversion infrastructure, and ensuring that any residual waste solution is transparent, equitable, and environmentally responsible. Additional themes from the workshops that were discussed included:

- Feedback received from the public meeting and interest group workshops reflected a diversity of views: some supported landfilling due to concerns about incineration's emissions and long-term impacts while others saw energy-from-waste (incineration) as a necessary alternative given landfill constraints and capacity issues and its adoption in other jurisdictions across the world.
- Some raised concerns that incineration may undermine diversion goals by requiring a constant feedstock and could be perceived as a default solution rather than a last resort.
- Participants emphasized that much of what ends up in garbage is not truly residual, with estimates suggesting up to 60% could be diverted through better systems and support. They called for a greater focus on upstream efforts, including mandatory measures like food waste reduction policies, bans on non-recyclables, and enhanced producer responsibility. Concerns were raised about the misuse of diversion credits, prompting calls for clear oversight to prevent outdated technologies from being used under the label of diversion.
- Some participants recommended the City adopt the highest available emissions standards should it pursue incineration, preferably European, rather than less stringent models such as those in the United States, and to ensure strong oversight to prevent outdated or unregulated facilities from burning residuals under the label of diversion.
- The importance of removing hazardous and recyclable and organic materials from the feedstock prior to incineration was highlighted as critical to improving facility efficiency and reducing emissions.
- There were calls for transparency in how greenhouse gas emissions are calculated, and for third-party assessments of energy-from-waste (incineration) technologies that are free from conflicts of interest.
- Clear communication is needed to avoid greenwashing and to present the pros and cons of each option, including environmental justice implications. One participant felt the term "energy-from-waste" may be misleading and called for more public education on its risks and impacts.
- Source reduction, reuse, and circular economy infrastructure should be prioritized before investing in new disposal technologies. Policy tools such as tipping fees, deposit-return systems, and bans on non-recyclable materials were suggested to incentivize diversion.
- The City was encouraged to consider global examples of energy-from-waste (incineration), such as Yokohama, Japan; West Palm Beach, Florida, US; the EU jurisdictions, and lifecycle costs, emissions, and timelines in its planning.
- There was an emphasis on the importance of giving equal weight to upstream solutions and ensuring a transparent public engagement process.
- Site selection for any new facility should be transparent and consider traffic, safety, and proximity to communities, with a focus on minimizing long-term environmental harm. Routing and congestion were noted as important considerations, especially near existing waste infrastructure.
- Strong support for upstream food waste reduction policies, expanded composting, and Urban Harvest program to reduce organics in the residual stream.

- Clear interest expressed in exploring interim solutions such as baled waste storage and reverse vending machines to support diversion and reduce food insecurity.
- Some participants noted that energy-from-waste (incineration) should not be counted as diversion.
- Health and environmental impacts, particularly for Indigenous, racialized and lower income communities, must be prioritized, and siting of facilities should avoid impacts to these communities.
- Cost and convenience were identified as top priorities for businesses. Suggestions included free or subsidized waste audits, joint purchasing of eco-friendly supplies, and incentives for businesses that demonstrate waste reduction.
- Exploration of partnerships with the private sector to support residual waste solutions and reduce the financial burden on the City.

A summary of the discussion from the question and answer sessions and group discussions is further described in Sections 3.1 and 3.2 below.

3.1 Question and Answer Sessions

During the five workshops, participants were given the opportunity to ask questions before the facilitated group discussions under each of the two focus areas. Below is a list of questions raised by interest group participants during the question and answer sessions:

Waste Strategy Update

Data and Program Performance

- To what extent has the City utilized waste audits to better understand what materials are ending up in the waste stream and what sectors are generating the most waste?

System Enhancement and Access

- Would the City's consideration of more accessible drop-off locations include downtown Toronto, particularly for condo residents without access to a car?
- What is being done to address waste that is not collected and ends up in parks, shorelines, and ravines, given the current focus on collected waste only?
- Is the City considering a deposit refund system or other financial incentives to encourage recycling or waste reduction?

Organics Diversion and Processing

- Is there any discussion ongoing on the organics program (the Green Bin program), its future strategies, and updates on current facilities or plans for their expansion?
- Given that the City's existing organics processing facilities do not accept Biodegradable Products Institute (BPI) certified industrial compostable packaging, is there a timeline for upgrading infrastructure to process these materials and keep pace with emerging compostable packaging technologies?
- Is there a way for businesses to obtain a license or similar mechanism to ensure that their certified compostable products are properly processed in Toronto's composting system?
- Could a license help reduce confusion around products that appear compostable but contain conventional plastics?
- If a license is not possible, how can businesses help ensure that materials already accepted in the Green Bin are actually diverted from landfill to reduce greenhouse gas emissions and extend the life of the landfill?

Technology and Innovation

- If it is assessed that 60 per cent of black bag contents could be diverted or recycled, is that based on existing technologies or does it assume that the City would implement alternative or future technologies?
- Is the City considering advanced technologies like chemical recycling, which have also proven to be costly and ineffective in some cases, or is the focus strictly on upgrading existing mechanical recycling infrastructure?

Implementation Considerations

- Since we know Green Lane landfill has a limited lifespan, will that urgency be reflected in the City's Waste Strategy Update and lead to faster action on solutions?
- Will the proposed waste management options support the City's net zero emissions goals?
- How does the Extended Producer Responsibility (EPR) program work, and who provides its oversight?

Evaluation Criteria

- How is the City defining "social" as a set of criteria, and how does health fit into that definition, especially considering the health impacts associated with increasing waste and how it is managed?

Financing Models

- Could more municipal funds be directed to grassroots organizations to support reuse initiatives such as repair cafés?

Consultation

- Did we get a sense from the first consultation of how well reuse initiatives were received, particularly those targeting restaurants, dine-in services, and the reduction of single-use takeout items?
- How is the City engaging the most marginalized communities, and how many of last year's survey responses came from those communities?

Residual Waste Management

Waste Hierarchy and Diversion Priorities

- What would be the City's approach to discouraging reliance on landfilling by prioritizing waste reduction and reuse within the waste hierarchy rather than defaulting to incineration or disposal?
- Given that organics make up a significant portion of the waste stream, are there any plans to expand composting programs?

Technology and Infrastructure

- What waste management technologies is the City exploring beyond energy-from-waste (incineration) and landfill disposal?
- Is the composition of Toronto's waste stream suitable for energy-from-waste (incineration) technologies, particularly with respect to contaminants like batteries?
- Does the need for a constant feedstock supply to energy-from-waste (incineration) facilities risk limiting diversion efforts, and how should this be addressed?
- What is the process for getting approval to bring new waste processing technology to Ontario that can handle Dirty MRF (Materials Recovery Facility), mixed solid waste, single-stream, and organic waste?
- Would it be helpful to consider insights from jurisdictions outside of Canada when evaluating cost-effective approaches to setting up energy-from-waste (incineration) facilities?

- Given that incinerating plastic can also contribute significantly to emissions, is the City considering diverting *waste from landfill to incineration as part of its strategy?*

Emissions and Environmental Impact

- Can you share the reports or research used to support the greenhouse gas emissions data that was presented during the Environmental, Social Service, and Community Groups workshop?
- How do greenhouse gas emissions from energy-from-waste (incineration) compare to those from landfilling, and is the City updating its research in light of recent studies?
- How much methane would be avoided with energy-from-waste (incineration) compared to landfilling?
- When we assess greenhouse gas emissions in relation to landfills, is it accurate to assume that methane is released gradually over several decades?
- Does diverting waste from landfills as a carbon reduction strategy include landfills that capture and utilize landfill gas to produce renewable natural gas or only those that do not have gas utilization systems?
- Will the City incorporate scientific evidence from lifecycle analysis when evaluating residual waste management options?
- Is mass burn incineration more environmentally sustainable than gasification?

Cost and Operational Considerations

- How do staffing requirements and related operational costs compare between energy-from-waste (incineration) facilities and landfills?
- When the City says landfilling is a lower-cost option, does that assume the landfill is City-owned or would the City also consider contracting with a privately owned landfill?
- If incineration costs more than landfilling but generates energy, does that energy create revenue, reduce the City's energy or environmental costs, or both, and are these factors considered when comparing the two?

Jurisdictional Comparisons and Standards

- Given that Europe applies higher standards for energy-from-waste (incineration), what is the penetration rate of energy-from-waste (incineration) in Europe compared to Canada?
- In Europe, where landfilling is discouraged through taxation, is energy-from-waste (incineration) considered the preferred alternative?
- Are new landfills currently being developed in Europe?
- Given Peel Public Health's concerns about Ontario's air quality standards in relation to the proposed expansion of the Emerald energy-from-waste (incineration) facility in Brampton, does the City have the authority to require any new incinerators within its jurisdiction to meet higher air quality standards, such as those used in Europe?

Equity and Service Access

- If the City moves forward with either landfilling or energy-from-waste (incineration) for residual waste, how will this affect properties that rely on private waste collection services, and are those properties currently being offered the same disposal options or is most of their waste still going to landfill?

3.2 Small Group Discussions: Waste Strategy Update

The objective of the discussion in each workshop under the Waste Strategy Update was to gather input on the options being considered to achieve long-term waste management goals, the criteria for evaluating those options, and exploring associated opportunities and challenges.

City and GHD staff facilitated these discussions. Table 3 below describes the themes and sub-themes under which the input was organized.

Table 3 Discussion Themes and Sub-Themes – Waste Strategy Update

Discussion Themes	Discussion Sub-Themes
– Waste Strategy	<ul style="list-style-type: none"> – Vision and Guiding Principles – Evaluation Criteria
– Reduce, Reuse, Recycle, Recovery	<ul style="list-style-type: none"> – Programs – Single-Family Collections – Multi-Residential Collections – Non-Residential Collections – Infrastructure, Equipment and Technologies
– Communication, Education and Engagement	<ul style="list-style-type: none"> – Promotion and Education – Consultation
– Implementation Tools and Considerations	<ul style="list-style-type: none"> – Enforcement, City Bylaws and City Policies – Financing Models – Provincial and Federal Policies, Regulations and Advocacy – Data Collection and Reporting
– Ideas and Innovation	<ul style="list-style-type: none"> – Programs – Single-Family Collections – Multi-Residential Collections – Non-Residential Collections – Infrastructure, Equipment and Technologies
– Other	<ul style="list-style-type: none"> – Partnerships – Equity and Access – Circular Economy and Local Economic Development

The following is the summary of input provided by participants during each workshop.

3.2.1 Environmental, Social Service, and Community Groups

Waste Strategy Update

Evaluation Framework

- Social and environmental criteria were identified as critical in evaluating options. The circular economy was viewed as a means of achieving both environmental and social benefits.
- The need to clearly define “social” as a set of criteria was emphasized, as vague definitions risk diluting its meaning. It was noted that for non-profit organizations, “social” refers to strengthening communities and improving health outcomes rather than simply meeting environmental, social, and governance metrics.

Reduce, Reuse, Recycle, Recovery

Programs

- Waste diversion in schools was identified as a priority. A participant suggested introducing reusable containers to reduce takeout waste and emphasized the need for the Single-Use and Takeaway Items Reduction Strategy (SUTI) to align with school boards policies and education needs for families.
- A participant highlighted the need for expanding SUTI efforts to include theatres, stadiums, bars, and hospitality venues, where high volumes of waste are generated.
- Participants called for immediate consultation on the new single-use and takeaway items bylaw, with strong restrictions on single-use items and a focus on high-volume generators. They emphasized the need to reduce

single-use products and contamination through behaviour change and targeted interventions with retailers and industries.

Multi-Residential Collections

- Concerns were raised about tri-sorters in multi-residential buildings, with many reported as broken, even in newer buildings, due to mechanical issues resulting in frequent downtime. Participants called for support to help older buildings modernize their waste sorting infrastructure to promote source separation. Suggestions included applying design guidelines to new developments, such as requiring three separate chutes or centralized waste rooms, and improving infrastructure in older buildings. It was suggested that all new multi-residential buildings incorporate design guidelines requiring either three separate chutes or centralized waste rooms to support diversion efforts.

Infrastructure, Equipment and Technologies

- Some participants called for more accessible options for disposing of household hazardous waste, highlighting a broader call for infrastructure improvements that support proper waste management across all material types.

Communication, Education and Engagement

Promotion and Education

- Participants recommended additional Community Environment Days to increase public engagement and awareness.
- A participant noted a “Leave the Leaves” approach to yard waste, expressing concern about the impact of early leaf removal (e.g., mid-March collection) on overwintering pollinators. They suggested revising Parks maintenance practices and residential collection schedules to better support pollinator habitats. The waste collection calendar and other educational materials were identified as key tools to promote this message and encourage residents to leave leaves where they fall.
- A participant involved in litter cleanup noted that many residents do not sort properly and some “do not care,” underscoring the importance of more effective engagement.

Implementation Tools and Considerations

Enforcement, City Bylaws and City Policies

- Participants strongly called for action to remove the 60 per cent of waste that should not belong in the garbage bin, emphasizing that this is essential to extending the life of Green Lane Landfill and avoiding environmental harm. They stressed the need for stronger public education, consistent enforcement of waste sorting requirements, and coordinated efforts with other levels of government.

Financing Models

- To support behaviour change and reduce reliance on landfill, participants suggested upstream interventions such as increasing tipping fees to incentivize diversion.

Provincial and Federal Policies, Regulations and Advocacy

- Participants urged the City to prioritize reduction and reuse, emphasizing the need for strong upstream solutions. They noted that municipalities have historically dismissed upstream policy measures by deferring to provincial or federal jurisdiction, rather than viewing them as complementary. Participants encouraged the City to lead on upstream policy and leverage local expertise, and also called for more demolition audits, creative reuse strategies, and upstream interventions to reduce residual waste.
- Some participants identified industrial and commercial producers as key contributors to residual waste, citing examples such as plastic tubes from marijuana stores, and called for stronger producer responsibility.

Data Collection and Reporting

- Some participants, while noting that a significant portion of recyclable or divertible material continues to end up in the garbage stream and expressing concerns with the effectiveness of current education and outreach strategies to support diversion efforts, emphasized the importance of data in supporting diversion goals. They called for real-time, transparent data sharing on contamination and improper sorting to create an ongoing feedback loop with community organizations, expressing interest in collaborating with the City to analyze this data. They further emphasized that this feedback loop should be continuous and not limited to periodic reviews.

Ideas and Innovation

Programs

- The current system was seen as making it too easy to discard large, reusable items like sofas. Highlighting that convenience will be a key to encouraging reuse, a participant suggested that a reuse service similar to the Toxic Taxi for bulky goods is considered.
- Additional areas of interest included composting at community gardens and food waste rescue through food banks, highlighting the value of community-based solutions to waste reduction and diversion.

Infrastructure, Equipment and Technologies

- Participants urged the City to be cautious when exploring new technologies. They cited Edmonton's failed investment in an Enerkem facility as a cautionary tale and asked whether the City is considering advanced technologies such as chemical recycling, which they noted have, in some cases, proven costly and ineffective.

Other

Equity and Access

- A report was cited identifying environmental racism in high-rise buildings, noting that residents in these buildings do not have the same access to diversion programs as those living in single-family homes. Participants called for equitable access to organics collection, particularly in privately serviced multi-residential buildings, as well as reuse opportunities and clear information about what happens to discarded materials.
- Participants expressed concern that energy-from-waste (incineration) may facilitate environmental racism by locating waste facilities in communities outside the city. They stressed the need to consider the social and health impacts of waste management decisions and advocated for keeping facilities within Toronto to mitigate harm to other communities.

Circular Economy and Local Economic Development

- A participant highlighted the role of local reuse companies in advancing diversion goals. They questioned whether these businesses are being meaningfully engaged and suggested that investing in them could create green jobs and return value to the local economy.

3.2.2 Waste Industry

Waste Strategy Update

Evaluation Framework

- Convenience, access, and equity are major challenges in the multi-residential sector and require further attention.
- Financial impact and cost effectiveness were identified as key considerations. The Waste Strategy Update should evaluate whether a program is more cost effective when delivered by the City or through the open or merchant market.

Reduce, Reuse, Recycle, Recovery

Infrastructure, Equipment and Technologies

- The current minimum standard for new multi-residential buildings is a tri-sorter but this is not working effectively. Contamination rates remain high.

Implementation Tools and Considerations

Enforcement, City Bylaws and City Policies

- Multi-residential buildings in Toronto are not required to use City waste services. Many use commercial service providers which are not mandated to support diversion. As a result, even multi-residential buildings with basic infrastructure for diversion often send most material to landfill.
- There is no specific mention of the Toronto Green Standard (TGS) in the Waste Strategy. TGS has not evolved to support effective waste diversion or management. While citing examples such as the continued reliance on tri-sorters in new builds despite high contamination rates, the lack of mandated diversion in buildings using commercial waste services, and the absence of legislative tools such as flow controls in the multi-residential sector, participants noted that TGS has not evolved to support effective waste diversion or management.

Provincial and Federal Policies, Regulations and Advocacy

- Legislative tools such as flow controls are not being applied in the multi-residential sector contributing to low diversion performance.
- Recent changes to the EPR program have reduced the range of materials managed due to cost, which may undermine broader circular economy goals.

Ideas and Innovation

Infrastructure, Equipment and Technologies

- A participant noted that a curbside Green Bin program in Washington, D.C., supported by a smart bin system, uses QR codes via the metroKEY app and keypad access to manage user engagement and control access. This model is expanding to other cities and could be considered for multi-residential settings in Toronto to track behaviours and support waste diversion.
- Several participants pointed out that deposit return systems are gaining momentum in Europe and could be considered in Toronto's future waste planning, not only for beverage containers but also for food waste and other streams.

3.2.3 Businesses and Business Associations

Waste Strategy Update

Evaluation Framework

- It was emphasized that financial criteria should be a priority when evaluating options, especially in light of the current cost of living crisis and the role of government in supporting affordability. A clear cost-benefit approach was suggested to help encourage diversion in multi-residential settings by demonstrating the value of participation.

Reduce, Reuse, Recycle, Recovery

Infrastructure, Equipment and Technologies

- The City does not accept BPI certified industrial compostable packaging. There was interest in knowing whether there is a timeline for when facilities will be updated to process these materials, given the need to stay current with emerging compostable packaging.

Implementation Tools and Considerations

Enforcement, City Bylaws and City Policies

- It was observed that enforcement remains a challenge in small-scale strip malls due to site constraints, limited oversight and unclear responsibilities, particularly in mixed-use buildings. Privacy concerns and limited engagement further complicate monitoring. While education is important, there was agreement that basic enforcement measures like ticketing must be addressed first, with education and enforcement working hand in hand.

Provincial and Federal Policies, Regulations and Advocacy

- There was interest in whether businesses could obtain a licence or similar mechanism to ensure certified compostable products are properly processed. This could help avoid confusion around mixed bioplastics or products that contain conventional plastics. Smaller companies may be able to help facilitate this to ease the burden on the City. If that is not possible, businesses are interested in how they can help ensure that materials already accepted in the Green Bin are actually diverted from landfill, thereby reducing greenhouse gas emissions and extending the life of the landfill.

Data Collection and Reporting

- A participant highlighted the usefulness of bin inspections in reinforcing consumer responsibility for proper sorting, while also emphasizing the importance of producer responsibility. They observed that bin inspections can generate valuable data to identify gaps in participation and education, particularly relevant in the context of EPR programs for compostables and organics. This aligns with the City's proposal to improve tracking and measurement. Emphasizing the need for evidence-based decisions, the participant also noted that the City has historically maintained strong data on programs like the Blue Box. Although responsibility has shifted to producer responsibility organizations (PROs) such as Circular Materials, municipalities still hold decades of experience and data that can inform next steps.

Other

Partnerships

- A participant shared that their business uses only compostable materials and is partnering with organizations like Green Circle Salons to develop a recycling program for others in the industry. Recognizing that this effort is costly and challenging for small businesses they inquired about the possibility of partnering with the City to improve recycling outcomes.

3.2.4 Residential Associations, Property and Facilities Management

Waste Strategy Update

Reduce, Reuse, Recycle, Recovery

- Construction waste was raised as a concern. While not a major stream collected by the City, participants wanted to ensure it is addressed in the Waste Strategy Update.

Evaluation Framework

- Financial constraints were noted as a barrier to prioritizing waste strategies. Education was seen as a foundational investment that should be supported first.

Reduce, Reuse, Recycle, Recovery

Programs

- Community composting programs were appreciated but considered too limited in scale.

Multi-Residential Collections

- It was observed that organics participation remains low in many multi-residential buildings, either due to limited engagement with the City's Green Bin program or because some buildings, particularly those with private waste collection, do not have access to organics diversion at all, while recycling is more established. At the same time, concerns were raised about collection requests submitted through 311 not always being fulfilled, highlighting the need for improved staff training. More targeted education and engagement were encouraged to support organics diversion, alongside operational improvements.
- A participant cited a St. James Town study showing residents want to divert waste but face barriers like limited resources, education, and infrastructure. The feedback urged the City to adopt best practices, such as banning organics from landfill as recommended in the 2021 Auditor General's report, and to integrate privately serviced multi-residential buildings into the municipal system, noting that private collection lack diversion incentives.
- Noting that outdated infrastructure is discouraging participation in waste diversion, some participants requested more specific detail on how the Waste Strategy Update addresses the realities of multi-residential buildings. Many older buildings lack space for three-chute systems, and some advocated for closing garbage chutes entirely to encourage sorting in common areas.
- With examples cited of buildings where walk-down systems have improved diversion, participants highlighted the need for easier access to chute closure programs.

Communication, Education and Engagement

Promotion and Education

- While identifying challenges with waste diversion in multi-residential buildings, some participants noted a lack of awareness about the programs currently available.
- The 3Rs Ambassador Program was seen as valuable, but insufficient on its own. A participant pointed out that volunteer-only models are unsustainable.
- In-person, door-to-door engagement was seen as more effective than lobby-based education in multi-residential buildings. According to a participant, they have had a 75 per cent participation rate in their building using this approach.

- Apathy and mistrust were identified as major barriers to participation, with some residents believing the City does not actually sort waste, which leads them to disengage. Participants recommended that the City share transparent and encouraging data, such as “90 per cent of your Green Bin becomes compost,” to build trust and demonstrate impact.
- Participants emphasized that education is a critical need but must be tailored, sustained, and adequately resourced to be effective. They called for more strategic partnerships with the City to support this work, noting that while the 3Rs Ambassador Program is helpful, broader support is needed to organize and deliver education sessions successfully.

Implementation Tools and Considerations

Enforcement, City Bylaws and City Policies

- Participants requested clarity on the City’s authority to mandate actions such as requiring reusable packaging or enforcing building design guidelines. Understanding what the City can and cannot do would help them provide more focused and actionable input.
- Concerns were also raised about condominiums using private waste services, where sorted materials are reportedly collected in a single truck, undermining resident efforts. One participant specifically asked whether there are ways the City can hold private collectors accountable. Vancouver’s multi-stream recycling system was cited as a best practice to reduce contamination.

Other

Partnerships

- The City was encouraged to support grassroots organizations that are embedded in local communities and better positioned to deliver culturally relevant education and services, particularly in communities where the City may face barriers to direct engagement. A participant noted that in Flemingdon Park, Muslim women have been composting since March, with one household producing 200 pounds of compost, but without Green Bin collection in their privately serviced building, it all goes to landfill.
- A participant representing the Toronto District School Board (TDSB) noted that the Board would be interested in offering a textile diversion program at the end of the school year, provided it is school-specific and does not allow public drop-offs. They emphasized that such initiatives must remain focused on school communities, building on existing engagement through programs like eco-clubs. The participant also noted that effective education requires significant investment in curriculum development and cannot rely solely on posters or small honorariums.
- There were questions asked about whether the City would support battery and e-waste collection in privately serviced buildings. Participants suggested leveraging programs like Call2Recycle and school-based battery collection as models.

3.2.5 Indigenous Community Organizations

Reduce, Reuse, Recycle, Recovery

Programs

- A participant emphasized the importance of supporting grassroots-led reuse initiatives, such as repair cafés and repair clinics. While inquiring about the possibility of directing municipal funding toward these efforts, the participant also expressed interest in having Indigenous organizations host such events.

3.3 Small Group Discussion: Residual Waste Management

The objective of this discussion was to gather input from participants representing each interest group on their perceptions of the use of energy-from-waste (incineration) technologies as a potential residual waste disposal option, compared to landfilling. Participants were also asked about the values influencing their views, including environmental, economic and social considerations.

City and GHD staff facilitated these discussions. Table 4 below describes the themes and sub-themes under which the input was organized.

Table 4 Discussion Themes and Sub-Themes – Residual Waste Management

Themes	Sub-Themes
– Residual Waste	<ul style="list-style-type: none">– Energy-from-Waste (incineration)– Landfilling– Reduce, Reuse, Recycle, Recovery– Communication, Education and Engagement– Implementation Tools and Considerations– Ideas and Innovation– Waste Strategy– Other

The following is the summary of input provided by participants during each workshop.

3.3.1 Environmental, Social Service, and Community Groups

Residual Waste – Energy-from-Waste (Incineration)

- There was general support for greater efforts to increase diversion prior to focusing on disposal technologies and some criticism of the City's exploration of incineration as a potential option for residual waste management.
- A participant expressed support for energy-from-waste (incineration) based on research suggesting it produces fewer greenhouse gas emissions than landfilling. However, they acknowledged that landfill gas capture can also reduce emissions.
- Some participants cited studies that dispute claims of lower emissions from energy-from-waste (incineration) compared to landfilling, especially when biogenic emissions are considered.
- There was a call for transparency regarding greenhouse gas emissions and pollution from energy-from-waste (incineration). Some participants expressed concern that most available data comes from companies rather than independent third parties, and recommended a conflict-of-interest-free, third-party assessment. They also cautioned that incineration could lead to increased waste generation and greenhouse gas emissions and stressed that even the best scrubbed incinerators contribute to air pollution and health risks.
- Some participants felt the City had already decided in favour of energy-from-waste (incineration) and that the survey reflected this bias. They urged the City to give equal weight to upstream policies that reduce waste generation.
- Concerns were raised about the environmental and social impacts of energy-from-waste (incineration), particularly on Indigenous, lower income and racialized communities. Several participants described this as a form of environmental racism and urged the City to take these impacts seriously. To help prevent harm to neighbouring communities, the City was encouraged to sort waste within its boundaries and avoid sending toxic or hazardous materials elsewhere, where they could contaminate water sources.

Residual Waste – Landfilling

- Some participants noted that landfills allow for the possibility of future material recovery through landfill mining.
- A participant pointed out that energy-from-waste (incineration) requires a constant flow of materials, which may undermine diversion goals by creating a constant demand for waste as fuel.
- A participant opposed incineration but acknowledged improvements in energy-from-waste (incineration) technologies.

Residual Waste – Reduce, Reuse, Recycle, Recovery

- Participants called for a stronger focus on source reduction, particularly targeting single-use plastics, and emphasized the importance of education in shifting public behaviour. They highlighted the value of materials currently being discarded, citing examples such as companies that recycle bricks and repurpose wood. To support a circular economy, they encouraged investment in infrastructure that enables material recovery and reuse. In line with this, they supported textile diversion initiatives including textile donations, repurposing, clothing swaps, and second-hand donations. They also advocated for improved access to hazardous waste drop-off, organics chutes, and sorting infrastructure in multi-residential buildings to further support diversion efforts.
- It was pointed out that much of what ends up in garbage is not truly residual waste but materials that currently lack diversion streams. They encouraged the City to invest in diversion infrastructure and mixed waste processing to extract upstream materials before considering incineration.
- A participant suggested expanding the Urban Harvest program to more neighbourhoods to increase access to surplus produce and reduce food waste.
- There was a suggestion to implement mixed waste sorting facilities within City limits to recover the 60 per cent of material currently going to landfill that could be diverted.

Residual Waste – Communication, Education and Engagement

- A participant requested transparency and technical information on how energy-from-waste (incineration) has evolved over time to inform decision-making.
- Some participants raised concerns about the framing of energy-from-waste (incineration) as a potential emissions reduction strategy. They questioned whether the City is considering incineration as a landfill diversion method and emphasized that burning plastics contributes significantly to greenhouse gas emissions. Participants requested clarification to avoid public misunderstanding and asked that the City name “greenwashing” as a con in any pros and cons analysis.
- Some participants requested more detail on the methodology and calculations used by the City to assess the climate impacts of energy-from-waste (incineration).
- Participants recommended placing “Refuse” at the top of the waste hierarchy and educating the public about the health and environmental impacts of microplastics and incineration.

Residual Waste – Implementation Tools and Considerations

- A participant emphasized the need for a realistic waste management system and noted the political and regulatory challenges of siting new landfills in Ontario.
- Participants asked whether the City could implement a food reduction policy similar to the approach in France, which requires markets to donate edible food.
- There was support for upstream policies to reduce the need for landfills and incinerators. A participant noted that space is limited and communities are increasingly opposed to landfills.

Residual Waste – Ideas and Innovation

- A participant referenced Yokohama, Japan, as a model for implementing waste reduction strategies that led to reduced reliance on incineration. They encouraged the City to learn from Japan's experience with both waste reduction and incineration practices.
- There was support for investing in new technologies that offer alternatives to landfill and help offset emissions, with an emphasis on long-term value over short-term cost savings. Suggestions to incentivize diversion included increasing tipping fees and introducing refund systems for bottles and tins, similar to programs in the Netherlands.

3.3.2 Waste Industry

Residual Waste – Energy-from-Waste (Incineration)

- A participant pointed out that globally, many jurisdictions are addressing land scarcity and advancing carbon capture technologies that can be integrated with energy-from-waste (incineration) facilities. These approaches reflect a modern perspective on waste management, emphasizing adaptability and the speed of deployment. Alternatives to landfilling should be considered in future planning.
- The technology used in energy-from-waste (incineration) facilities today, particularly in the EU, was noted to be significantly more advanced than what is currently operating in Canada. A participant particularly highlighted that there are also improved methods for managing waste before it enters an energy-from-waste (incineration) facility, such as removing metals, shredding, compacting, and baling. Baled waste can be stored for up to 10 years without degradation or attracting vermin, unlike loose waste. This approach is already being used in Edmonton, where baling helps reduce bird activity near a landfill close to the airport. Technologies like SCR (Selective Catalytic Reduction), used in places like West Palm Beach, Florida, also help capture additional emissions. According to the participant, these innovations can make energy-from-waste (incineration) facilities much cleaner and more efficient than older models, and especially when compared to landfilling.
- A participant observed that implementing an energy-from-waste (incineration) program is important given increasing waste volumes and more heavy trucks on congested roads. In making the point, they particularly noted that a 70 per cent diversion rate is ambitious and significant amounts of garbage are still being generated.
- Participants raised concerns about how energy-from-waste (incineration) facilities are perceived by the public. They noted that if people believe all waste will simply be incinerated, they may be less motivated to reduce or sort their waste. However, examples such as West Palm Beach, Florida, demonstrate that energy-from-waste (incineration) facilities can coexist with improved recycling outcomes, particularly for metals. Participants also emphasized the importance of timing. While landfills can take six to eight years to permit and construct, energy-from-waste (incineration) facilities may be developed more quickly. Interim options, such as storing pre-processed waste for nine to twelve months, were suggested as practical solutions during facility development. These considerations, including timing, scalability, and population growth, were seen as especially relevant for growing urban centres like Toronto.
- Several participants noted that the York-Durham model and other Canadian examples may not reflect the most cost-effective approaches to setting up energy-from-waste (incineration) facilities. Insights from other jurisdictions could inform energy-from-waste (incineration) pricing models. Additionally, the assumed lifecycle of a landfill (e.g., 25, 50, or 100 years) should be factored into cost comparisons with energy-from-waste (incineration) facilities, which may have longer lifespans.
- Some participants questioned what problem the City is trying to solve. While landfill space has long been a known issue, responsibility has often been deferred. There is concern that action may be delayed into an election year, pushing decisions to 2027 or later, even as landfill capacity continues to decline. Reducing consumption is seen as unrealistic, especially with 1.5 million new housing units planned and the resulting construction and demolition waste. Although proven technologies exist globally, the challenge lies in presenting them to Council in a way that prompts action, particularly as the sense of urgency has diminished for many.

- A participant clarified that energy-from-waste (incineration) technology has advanced significantly since the development of the York-Durham facility. They pointed to jurisdictions like the South Coast Air Quality Management District in Southern California, which enforce some of the highest emissions standards, as evidence that strong regulatory frameworks do exist. The participant encouraged the City to ensure that any future energy-from-waste facility is designed to meet or exceed these standards.
- Several participants weighed in on the fact that not all ash from energy-from-waste (incineration) facilities ends up in landfill. In some jurisdictions, ash is reused in construction materials. As technology advances, similar approaches are expected to emerge in Canada and Ontario, following examples from Europe and elsewhere. A Singapore-based company was mentioned as having developed a solution for managing ash from an energy-from-waste facility.

Residual Waste – Landfilling

- It was noted that while landfilling may seem less expensive at first, the long-term costs such as ongoing maintenance, runoff management, and land use impacts are significant and permanent. They also emphasized the importance of considering the social and environmental impacts of placing landfills on or near Indigenous lands.

Residual Waste – Reduce, Reuse, Recycle, Recovery

- It was noted that food waste remains a challenge across sectors. There is limited motivation to manage materials on site, particularly in the ICI sector and post-secondary institutions, where significant impact could be made. There are no grants supporting options like vermiculture, on-site composting, or automated systems, which could reduce material sent off-site or to energy-from-waste (incineration) facilities where it has no beneficial use. The conversation around food waste needs to become more detailed and urgent, especially in relation to the City's SUTI reduction priorities.

Residual Waste – Implementation Tools and Considerations

- Some participants expressed concern that discussions about energy-from-waste (incineration) facilities are occurring before broader system elements, such as circularity and upstream waste reduction, are in place. They emphasized that a premature focus on incineration could undermine public motivation to divert waste. There were calls for stronger leadership from provincial and federal governments to ensure that system-wide sustainability goals are prioritized and that solutions are scaled across Ontario and Canada.
- Energy-from-waste (incineration) should not be counted as diversion. Some companies shift from landfilling to energy-from-waste (incineration) and stop improving waste practices while claiming 100 per cent diversion which misrepresents true diversion. There is currently an Environmental Registry of Ontario (ERO) posting regarding the potential to claim up to 15 per cent diversion through energy-from-waste (incineration). This reflects a shift in the province's perception of energy-from-waste (incineration) and how it might be utilized, especially if technologies like carbon capture or other diversion-enhancing methods are integrated into energy-from-waste (incineration) operations.
- Some participants cautioned that early discussions about energy-from-waste (incineration) and diversion credits could lead to unintended consequences. For example, a concrete plant in Clarkson is exploring burning residual materials from recycling, raising concerns about outdated technologies being used under the label of diversion. One participant, referencing a cement facility in Scarborough, encouraged the City to consider how similar facilities might be affected, especially if they lack proper carbon capture or emissions controls. These developments could have environmental and regulatory impacts that were not originally anticipated.

Residual Waste – Ideas and Innovation

- Reverse vending machines were pointed out as a complementary solution. In a provincial project, they collected clean recyclables and provided food discounts which helped address food insecurity.

3.3.3 Businesses and Business Associations

Residual Waste – Energy-from-Waste (Incineration)

- While energy-from-waste (incineration) was seen by some as a promising alternative to landfilling, concerns were raised about its environmental and health impacts. Specifically, participants noted that it can pollute the air and affect lung health, and that more education is needed on these risks.
- A concern was raised regarding energy-from-waste (incineration) being viewed as producing fewer greenhouse gas emissions than landfilling. One participant, referencing recent studies suggesting that burning garbage may in fact result in higher emissions, requested that the City consider updating its research on this issue.
- Some participants expressed concern that Ontario's energy-from-waste (incineration) standards are less stringent than those in other jurisdictions. They urged the City to adopt the highest available standards rather than following less rigorous models, such as those in the United States.
- The importance of removing hazardous and organic materials from the feedstock prior to incineration was emphasized as a key factor for the success of energy-from-waste (incineration) processes. Facilities that receive cleaner inputs were observed to operate more efficiently and produce lower emissions.
- A participant stated that if the City proceeds with incineration it must adopt European standards as Ontario and other North American standards do not adequately regulate dioxins and other such dangerous toxins.
- Participants stressed the importance of minimizing environmental and health impacts from residual waste management, particularly in relation to air quality and emissions from energy-from-waste (incineration) facilities. There was a suggestion that the City consider adopting air quality regulations similar to or stronger than those used in the United States, while also recognizing that the United States standards may not be sufficient.

Residual Waste – Landfilling

- A participant noted that in their Business Improvement Area (BIA), there is a waste transfer station where traffic flows and vehicle routing are monitored due to concerns about congestion and safety. They emphasized that routing is an important consideration in site selection and highlighted the standard 3-kilometre distancing requirement for landfills as a key evaluation factor. They stressed that site selection should be a transparent, public process.

Residual Waste – Reduce, Reuse, Recycle, Recovery

- A participant highlighted that up to 60 per cent of what residents place in the garbage could be diverted, emphasizing this as a major opportunity for improvement. They urged the City to focus more on what residents need in order to divert materials properly noting that current discussions tend to emphasize enforcement and accountability over resident support.

Residual Waste – Communication, Education and Engagement

- A participant expressed concern that the term “energy-from-waste” may be misleading, as it sounds positive but does not fully reflect the potential environmental and health impacts. They felt the discussion should place greater emphasis on learning and education around energy-from-waste (incineration) and its impacts.
- The need for clear, transparent communication with the public about the risks and benefits of different waste management options was highlighted as a way to build trust and support.

Residual Waste – Implementation Tools and Considerations

- Some participants expressed a preference for waste management approaches that are safe, low-cost, and easy to implement, with cost identified as the top priority. They also encouraged the City to explore supportive measures such as subsidies, incentives, or partnerships to help businesses adopt eco-friendly practices and improve food waste management.

- Cost and convenience were noted as top priorities for businesses when it comes to waste management. Several participants noted that complex processes make participation more difficult. They suggested the City consider offering free or subsidized waste audits to help businesses reduce waste and explore incentives for those that show improvement. They also proposed joint purchasing of eco-friendly supplies to make sustainable practices more accessible.

Residual Waste – Others

- Participants emphasized the need for the City to consider the full potential of waste diversion, noting that up to 60 per cent of waste could be diverted with the right systems and supports in place. There was interest in exploring partnerships and incentive programs that could help businesses contribute to long-term waste reduction goals.
- A suggestion was made that the City should consider initiating discussions with the private sector to explore whether a joint approach to residual waste management could be beneficial. A participant noted there may be opportunities for private investment that could help reduce the burden on the City, such as supporting energy-from-waste (incineration) facilities or expanding landfill capacity and related regulations.

3.3.4 Residential Associations, Property and Facilities Management

Residual Waste – Energy-from-Waste (Incineration)

- Some participants were not in favour of energy-from-waste (incineration) noting that countries using incineration often do so due to land constraints, which is not currently an issue in Toronto. They emphasized that more should be done to reduce and divert waste before considering energy-from-waste (incineration).
- Some participants acknowledged that while emissions from energy-from-waste (incineration) facilities have improved over time, it is still not an acceptable option. Concerns were also raised about the social and financial impacts of energy-from-waste (incineration), including siting in underserved communities and higher associated costs.
- Participants highlighted the need to prioritize health impacts for vulnerable populations when evaluating residual waste management options.
- Concerns were raised about the siting of energy-from-waste (incineration) facilities in underserved communities and the associated environmental justice implications.

Residual Waste – Landfilling

- A participant, while recording their preference for landfills, noted that lifecycle analysis suggest landfilling may be more acceptable especially when dealing with certain materials like plastics.

Residual Waste – Reduce, Reuse, Recycle, Recovery

- There was support for advancing the 5Rs hierarchy to reduce overall waste generation.

Residual Waste – Communication, Education and Engagement

- A participant expressed concern about a perceived City's bias toward incineration. They noted that while incineration is often referred to as "energy from waste," landfills also capture energy through gas recovery systems. To reflect this more accurately, they suggested using the terms "incineration with energy recovery" and "landfill with energy capture."

Residual Waste – Implementation Tools and Considerations

- Participants, emphasizing the importance of addressing waste at the source, encouraged the City to focus its efforts on influencing both consumer and producer behaviours. They noted that achieving net zero would not be possible through incineration alone and called for stronger federal and provincial action to regulate producers.

Residual Waste – Ideas and Innovation

- The City was asked to confirm whether there is a minimum waste volume required for incineration and was presented with a suggestion to consider exploring bans on non-recyclable materials and investigate residual waste management models beyond Europe and US, such as those in Asia.

3.3.5 Indigenous Community Organizations

Residual Waste – Energy-from-Waste (Incineration)

- A participant indicated that energy-from-waste (incineration) may be the most attractive option, as developing a new landfill was seen as deferring the problem rather than solving it.



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