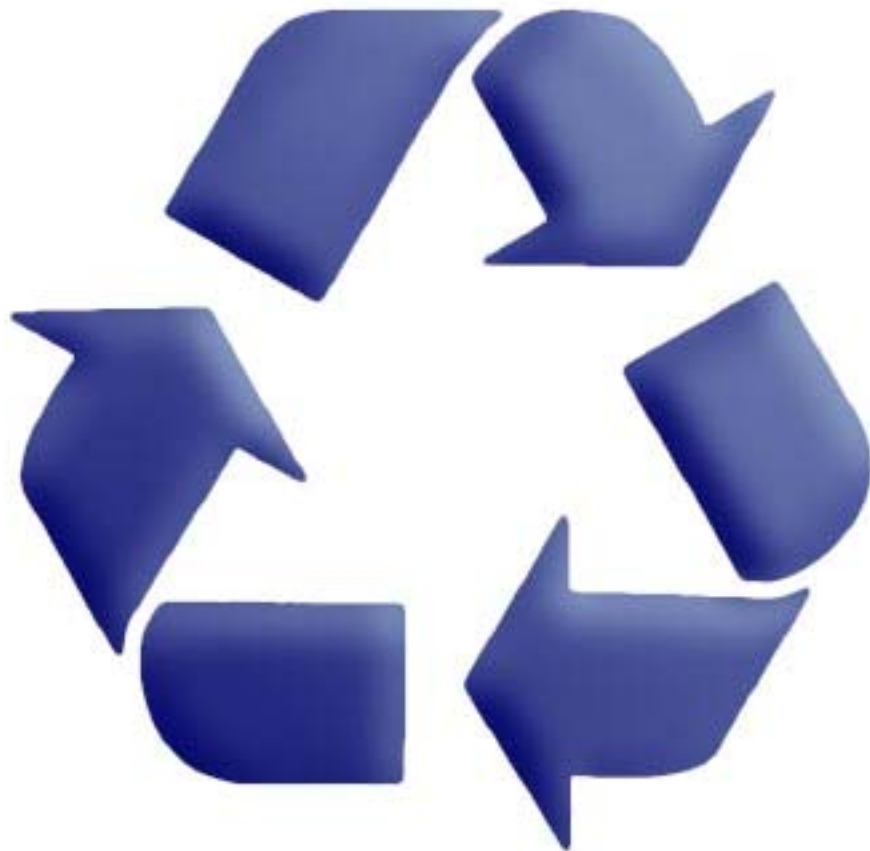


**Waste Diversion Ontario**  
**Report on Consultation on**  
**Greater Consistency of Recyclable**  
**Material Collection**

**February 26, 2010**



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## 1 Background

Section 6.3, Consistency Across Municipalities, of the Blue Box Plan Review Report<sup>1</sup> submitted by Waste diversion Ontario (WDO) to the Minister of the Environment in April 2009, under Recommendation # 7, states:

*“To establish a process lead by Waste Diversion Ontario and including consultation with Stewardship Ontario, stewards, municipalities, service providers and end markets to:*

- *To select Blue Box materials to be collected in all municipalities based on specific criteria such as:*
  - *Percentage of Ontario households already receiving collection service for the material*
  - *Capacity in curbside collection container if collected at curbside*
  - *Compatibility with depot collection system if collected at depots*
  - *Ability to manage in processing systems*
  - *Will not contaminate other materials during processing*
  - *Availability of sustainable markets and*
- *Determine differential service levels (e.g., curbside or depot) to reflect regional variations based on specific criteria such as population, population density, and/or location.”*

In his letter, received August 14<sup>th</sup>, the Minister directed WDO to review and report back with recommendations by February 28, 2010 on:

*“Moving to greater consistency of materials collected across Ontario”*

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<sup>1</sup> The Blue Box Program Plan Review report can be found on WDO’s web site at:  
<http://www.wdo.ca/content/?path=page80+item126294>

The addendum to the Minister's letter further describes his direction:

- *“Recommend how to define “consistency” for printed paper and packaging material being collected;*
- *Recommend a list of printed paper and packaging appropriate for consistent collection by considering the current level of collection of Blue Box materials identified in O .Reg. 101/94 under the Environmental Protection Act and the Blue Box Program Plan (or similar material not specifically identified (e.g., PET clamshells) being collected in Ontario;*
- *Recommend process and timing for requiring consistent collection of recommended materials;*
- *Identify the benefits and barriers of consistent collection (with examples);*
- *State whether the printed paper and packaging types identified are likely to be generated by non-residential generators; and*
- *Estimate the financial implications and impacts on current Blue Box systems of collecting materials recommended for consistent collection, by comparing the current collection situation with consistent collection system recommended above.”*

On November 17, 2009 WDO released a Draft for Consultation of a Report on Greater Consistency of Recyclable Material Collection.

The draft report was prepared by WDO staff on the basis of information on recycling programs collected in the 2008 Datacall, direct contact with a number of experts in the area of material processing and marketing and information on material-specific costs developed by Stewardship Ontario for setting 2010 stewards' fees.

## **2 Objectives & Scope**

The objective of the consultation activities was to provide stakeholders with the opportunity to comment on the recommendations regarding the consistent collection of various materials. The scope of these consultations included posting the Draft Report for Consultation on the WDO website, informing stakeholders that the report was available for review and inviting them to a November 24<sup>th</sup> workshop/webcast, presenting the analysis and recommendations at the November 24<sup>th</sup> workshop/webcast and receiving written comments on the draft report until December 15, 2009.

## **3 Elements of Consultation**

### **3.1 WDO Website**

The Draft Report for Consultation on Greater Consistency of Recyclable Material Collection was posted on the WDO website (<http://www.wdo.ca/>) on November 17<sup>th</sup>. A copy of the correspondence from the Minister of the Environment of August 14, 2009 requesting WDO to address this issue was also available on the website.

### **3.2 Electronic Notice to Identified Stakeholders**

A list of interested stakeholders including the following groups was compiled:

- Representatives of municipalities who complete the WDO Datacall;
- Industry Associations/Organizations (OWMA, MWA, AMO, RCO);
- Environmental Non-Government Organizations (ENGOs); and
- Other stakeholders who participated in the Blue Box Plan Review consultations.

An Initial notification of the November 24<sup>th</sup> workshop/webcast was sent to all identified stakeholders on October 30<sup>th</sup>. This was followed up with a November 17<sup>th</sup> notification, to all people registered for the workshop/webcast, that the Draft Report was available on the WDO website. In addition, on November 23<sup>rd</sup>, all individuals registered for the workshop/webcast were sent information on the agenda, location of workshop and instruction for webcast participants.

### **3.3 November 24<sup>th</sup> Workshop/Webcast**

The workshop/webcast was held at the Marriott Toronto Downtown Eaton Centre Hotel (Salons C and D), 525 Bay Street, Toronto, Ontario. Some 72 people attended the workshop in person and a further 75 people participated during the live webcast. The slides used during the presentation and an archived version of the webcast were provided on the WDO website. Following the presentation of the analysis and recommendations participants, both at the workshop and online, were invited to ask questions and provide comments. Participants were also invited to submit written comments following the workshop up until the consultation deadline of December 15, 2009.

### **3.4 Other Input Provided to WDO**

In addition to providing information, the website also invited interested parties to submit comments and questions on the Draft Report on Greater Consistency of Recyclable Material Collection up until the consultation deadline of December 15, 2009.

## **4 Comments Received & Responses**

Comments were received on a wide variety of topics including:

- General support for the recommendations; (see page 20)
- The recommendation that film and polystyrene foam be collected at depots; (see pages 5 & 32)
- The type of material collection system to be employed; (see pages 7 & 49)
- Comments pertaining to specific materials (see pages 8 & 21) including:
  - Aluminum;
  - Gable top & aseptic containers;
  - Aerosols and paint cans;
  - Thermoform PET and other rigid plastic containers;
  - Film;
  - Polystyrene foam; and
  - Other materials.

- Linkages to the recommended process for problematic materials; (see page 31)
- Markets for materials; (see page 37)
- Promotion and education; (see page 40)
- Costs and cost analysis; (see pages 14 & 41)
- Flexibility to collect (or not collect) additional materials; (see page 44)
- Need to consider Extended Producer Responsibility (EPR) and potential changes to the Waste Diversion Act (WDA); (see page 44)
- Roles and Responsibilities; (see page 15)
- IC&I sector materials; (see page 46)
- Need to consider broader environmental and sustainability considerations; (see pages 13 & 46)
- Use of recycling symbols; (see page 48)
- Need to consider composting and other end of life options; (see page 48)
- Fairness regarding which materials are collected in the Blue Box; (see page 49)
- Use of municipal By-laws and recycling regulations; (see page 49) and
- Other topics (see page 50).

The following Table 1 provides a list of questions and comments made during the November 24<sup>th</sup> workshop/webcast along with WDO's response. The following Table 2 lists the additional comments received during the consultation period which ended on December 15, 2009.

The report page numbers where these comments and WDO's response are provided are referenced in the above bullet points. Two page number references are provided when an issue was raised at the workshop / Webcast (Table 1) and in the additional comment (Table 2)

**Table 1**  
**Consistency of Material Collection: November 24<sup>th</sup> Workshop/Webcast Questions & Comments**

Name & Affiliation	Question	WDO Response
<b><i>Depot Collection of Material</i></b>		
Dave Douglas, Vision Quest Environmental Strategies Corp.	With regards to collection of film at depots, would you consider curbside collection via bags accumulated in a larger bag (i.e. clear or blue)?	Programs that currently collect film in a larger bag at curbside report problems ensuring that the larger bags contain only film, rather than other recyclables or garbage. This contributes to sorting problems in the MRF.
Not identified	Slide 55 – Given 54% of the population receiving curbside collection, receive curbside collection of polystyrene foam, how can you recommend depot collection for these people?	The percentage of programs reporting that polystyrene foam is collected at curbside in the Datacall may be overstated as it may include programs that accept but do not solicit this material in the curbside program. Options that will be considered include: a) depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; b) municipalities with curbside service would be required to transition to depot; or c) municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome..
Brad Whitelaw, Niagara Region	With the recommendation that LDPE/HDPE Film and PS be collected at depots, rather than curbside, why is Return to Retail for both materials not being recommended?	The reference to “all non-curbside collection options” includes return to retail.
Joe Hruska, Hruska & Associates	1) In reference to film and other plastics being sources of litter, many items including newspaper, cans and plastics are sources of open blue box litter. This is an operational issue, not a barrier. It should be addressed in the best practices for collection.  2) The depot quantity estimate is based on the assumptions that depots will collect 50% of what is estimated to be collected at curbside. Is this from other experiences?	1) Comment noted.  2) This assumption is based on the relative effectiveness of depot collection relative to curbside collection, using data from programs that have shifted from depot to collection. A range is utilized given the order of magnitude estimate and degree of uncertainty.

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Name & Affiliation	Question	WDO Response
	<p>3) I Feel this is too high; - you have overestimated what will be collected by depots.</p> <p>4) What is the vision? Where do we go in the next 20 years? There is a very diverse packaging structure we need to deal with that will have environmental impacts on materials. Where is the Blue Box going in the next 20 years? Municipalities do not want to put money into MRFs in the next few years. However, we need to get started now. In order to make the bigger transition to materials collected in various systems we need to start in the next few years.</p>	<p>3) The assumption about depot collection includes all non-curbside collection options including return to retail. Non-curbside collection options are being explored and expanded under the MHSW and WEEE programs and these experiences may be leveraged to increase non-curbside collection of printed papers and packaging. .</p> <p>4) Comment noted.</p>
Sue McCrae, Ottawa Valley Waste Recovery Centre	For programs that are currently collecting film and polystyrene curbside would they be required to cease collecting curbside and move to depot?	<p>Options that will be considered include:</p> <p>a) depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service;</p> <p>b) municipalities with curbside service would be required to transition to depot; or</p> <p>c) Municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</p>
Ray Ehrlich, Dart Container	Is WDO recommending that municipalities that currently have curbside blue box collection of both polystyrene foam pillow packaging and/or meat trays and other foodservice products (which represent over	<p>Options that will be considered include:</p> <p>a) depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service;</p>

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<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
Corporation	50% of the population in Ontario) move from a curbside collection of polystyrene foam system to a depot collection system in three years, or is the recommendation only for those municipalities that do not currently collect these polystyrene foam products?	b) municipalities with curbside service would be required to transition to depot; or c) municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.
Virginia Swinson, City of Peterborough	We currently curbside collect many materials outside of the proposed consistent collection items. I am correct in believing that should the recommendations be accepted, we would then be obligated to stop collecting these materials curbside?	Options that will be considered include: a) depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; b) municipalities with curbside service would be required to transition to depot; or c) municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.
<b><i>Curbside Collection Systems</i></b>		
Phil Jensen, Genivar	A “best practice” collection system was mentioned. What does he mean by that?	The reference to a best practice collection system means the most efficient and effective method to collect materials based on currently available technology, knowledge and data.
Matt Kavanagh, City of Ottawa	Are you looking at single stream vs 2 stream programs and collection frequency and the relationship to cost, diversion rate and commodity value?	Consideration of consistent materials is focusing on the materials being collected not the method of collection. Cost estimates were based on data reported in the 2008 Datacall which included a mix of single stream and 2 stream collection systems.
Greg Preston, City of Orillia	The report does not get into how Blue Box recyclables are set out at the curb. Will there be recommended requirements for this as well?	Consideration of consistent materials is focusing on the materials being collected not the method of collection.
Greg Preston, City of Orillia	The report does not get into how Blue Box recyclables are set out at the curb. Will there be recommended	Consideration of consistent materials is focusing on the

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Name & Affiliation	Question	WDO Response
	requirements for this as well?	materials being collected not the method of collection.
Peter McMahon, Metro Waste Paper Inc. Ottawa	Comment/ Suggestion, Regarding the listing of Gable and Aseptic with fibre. Trial and error has demonstrated that in a two stream system Gable and Aseptic are easier to capture in the container stream. When they are included with the fibre there is a higher probability to end up in the residual component.	Comment noted. Consideration of consistent materials is focusing on the materials being collected not the method of collection.
<b>Specific Materials</b>		
Jeff Fielkow, Tetra Pac, Inc.	<p>1) Do we know what percent of material is exported off shore?</p> <p>2) I travelled across the globe, and toured 8-9 mills in South Korea. Re: slide 58, there is good market development in North America, including the press release regarding the new facility to be built in Quebec. There are several end users, and tissue mills, in the US and Mexico looking to buy post-consumer cartons. There is a need to put the information through the correct supply chains. It is agreed that our current demand for material exceeds what we're collecting.</p>	<p>1) WDO undertook a survey several years ago to determine final destination of printed papers and packaging collected in Ontario. One of the challenges in determining final destination is the marketing of materials by municipalities through brokers to downstream processors or markets. This survey has not been updated. With changing commodity markets, the current percentage of materials exported is not known.</p> <p>2) Comment noted. Data available suggest that the majority of gable top and aseptic containers are ultimately shipped offshore, often via local brokers.</p>
Brad Whitelaw, Niagara Region	1) This report does not address the #3 PVC or blister packaging. Will there be some initiative for these materials?	1) #3 PVC is included in the "other plastics" category. Blister pack is included in paper laminates

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	2) In addition, the report identifies adding “foil”, but it needs to distinguish between “rigid foil containers” vs. “foil wrap”.	2) Foil includes containers and wrap.
Kelly Spitzig, Regional Municipality of York	<p>1) Do laminates include spiral wound containers (like Pringles, etc)?</p> <p>2) Please provide clarification on where the “metal, fiber, plastic spiral wound containers” should go.</p> <p>3) Are non-petroleum based plastics considered?</p>	<p>1) Spiral wound containers are considered composite materials, rather than laminate materials.</p> <p>2) Consideration of consistent materials is focusing on the materials being collected not the method of collection. The collection stream for spiral wound containers may depend on the sorting technology being used and the actual packaging design as some are fibre tubes with metal ends while others are fibre tubes with plastic ends.</p> <p>3) The draft report on consistent materials does not address non-petroleum based plastics. Refer to the draft report proposing a process to address problematic materials.</p>
Heather Marshall, Toronto Environmental Alliance	<p>1) Regarding aseptic and gable top containers, these are grouped together. Are there any separated and identified markets for one and not the other? I have spoken to processors who want gable top but not aseptic.</p> <p>2) Would paper based soft drink/coffee cups be part of that category?</p>	<p>1) For the purposes of consistent materials, WDO did not find information on a provincial scale that would warrant separating these categories for purposes of markets.</p> <p>2) Paper based coffee cups are laminates of a paper layer and a plastic liner.</p>
Catherine Ujihara, Clorox	<p>Hi - I have a question concerning Gable Top/Aseptic containers in the Blue Box Program. Slide 71 provides a timeline for the inclusion of these items but Slide 62 reported that in the category of All Paper Packaging it was less clearly understood to include milk cartons, juice cartons, soup boxes and drink boxes.</p> <p>Can you define Gable Top/Aseptic containers and</p>	Slide 62 summarized some of the findings of Environics market research. There research tells us that if we told Ontario residents to put “All Paper Packaging” in the Blue Box, many people would not think to include milk cartons, juice cartons, soup boxes and drink boxes.

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Name & Affiliation	Question	WDO Response
	confirm whether or not any of them are currently included in the program?	<p>The Glossary of Key Terms in the November 17, 2009 Draft for Consultation, Report on Greater Consistency of Recyclable Material Collection provides the following definitions:</p> <p>“Aseptic Containers – Box type packaging containers made with layers of paper fibre laminated between thin layers of plastic and aluminum film. Often used to package drinks, soups and wine.</p> <p>Gable Top Carton – Paper container laminated with plastic having a square cross section and top gathered in a gable shape. Often used to contain milk and juice.”</p> <p>Both of these materials are presently widely collected by Blue Box Programs across the Province. The Table on page 14 of the Report shows that, of the population receiving curbside collection, 92.6% receive collection of Gable Top containers, and 88.1% receive collection of Aseptic containers. The timeline on slide 71 refers to when WDO recommends collecting these materials consistently across the province.</p>
Dan Lantz, Metro Waste Paper Recycling	<p>1) Regarding tubs and lids, consumers recognize the numbers at the bottom, but do not recognize “tubs”. In Calgary studies and experience showed that they were not recognized.</p> <p>2) Tubs &amp; Lids include items with all resin numbers, not</p>	<p>1) During the Environics market research survey, Ontario residents were shown images of packaging and asked to identify the image. The image of tubs and lids was well understood by Ontario residents. This level of understanding may be the result of municipal communication efforts as tubs and lids were introduced to Ontario collection systems over the past number of years.</p> <p>2) Comment noted.</p>

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	<p>just #2, #4, and #5 – consider this in market research</p> <p>3) It is important to note that some paint cans are metal cans only, while others are plastic with metal lids This should be clarified.</p> <p>4) Contaminants in Toronto’s single stream peaked at 26%. Now there is a cost to compensate the processors for dealing with this high level of contamination. This is an expensive proposition.</p> <p>5) Regarding Boxboard, there is more in the IC&amp;I sector than you care to imagine.</p> <p>6) Be careful when you put in more boxboard and focus on gross cost only. In either system, single stream or two steam; mills are pushing back now regarding the portion of boxboard and this is creating increased pressure to reach the #8 news quality standard. Reaching this standard can be achieved but you need a lot more people on the line. With extra boxboard, revenue will fall and sorting costs will increase. There is a significant net cost to the system for adding more of this material.</p> <p>7) Composting is not a solution for boxboard as composting system can’t take that much paper.</p>	<p>3) Comment noted.</p> <p>4) Comment noted.</p> <p>5) Boxboard will be added to the list of materials generated in the IC&amp;I sector.</p> <p>6) Gross costs were used in the analysis because of the fluctuations in commodity prices. Your comments regarding the cost implications of increasing the amount of boxboard are noted.</p> <p>The recommendations submitted by WDO in April 2009 to the Minister regarding the Blue Box Program Plan Review included a recommendation to include composting of boxboard in the Blue Box Program Plan.</p> <p>7) Comment noted.</p>
<p>Dave Douglas, VisionQuest Environmental</p>	<p>I have not heard any mention regarding compostable packaging (i.e. water bottles, clam shells). Are these items being addressed as part of your review?</p>	<p>The draft report on consistent materials does not address compostable packaging. The Blue Box Program Plan does not currently include composting of packaging. Refer to the draft report proposing a process to address problematic materials.</p>
<p>Greta Najcler, TDL Group (Tim</p>	<p>Important comment about paper hot drink cups being impossible to recycle: This is not true.</p>	<p>Comment noted.</p>

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Hortons)	Paper hot drink cups with poly liner can be recycled. They repulp very well in tissue mills and molded paper product mills. I have seen coffee cups repulp with no issues at the mill or with the end product so saying coffee cups are impossible to recycle is wrong. We are working to develop markets to continue to collect and recycle these cups. The fibre should not be wasted!	
Greta Najcler, TDL Group (Tim Hortons)	How is it that 52.1% of the population receives curbside collection for thermoform PET (#1) but it currently has no markets?	The percentage of programs reporting that thermoform PET is collected at curbside in the Datacall may be overstated as it may include programs that accept but do not solicit this material in the curbside program. Thermoform PET being collected is generally being bled into PET bottle bales. If the proportion of thermoform PET increases, markets may require separation.
Paul Brown, Koch Companies	Why are hot drink cups not recyclable? They have the same makeup as gable top containers.	The question of coffee cup recyclability is also affected by the presence of the coffee cup lid which is typically plastic.
Cathy Wiebe, County of Wellington	Regarding the inclusion of aerosol cans, slide 46 indicates there is a risk of explosion during baling at MRF's. In the draft report it states "this should not pose a problem provided the aerosol cans are empty". Since municipalities often struggle to get people to rinse their food containers, I don't believe we would see only empty aerosol cans in blue boxes. How do employers ensure the safety of MRF and curbside workers from this risk of explosion if they aren't empty?	Municipalities should, through appropriate communications channels, educate their residents to place only empty aerosol containers in their Blue Boxes and that all fuel tanks, regardless if they are empty or still contain some fuel, along with aerosol cans that are not empty, should be taken to a MHSW facility. Standard Operating Procedures for collection and MRF processing should ensure the safety of collection and MRF workers from the risk of explosion. It should be noted that the MHSW Program Plan will also be communicating with residents regarding proper management of pressurized containers and aerosol containers with residual material which should align with municipal communications.
Brad Whitelaw, Niagara Region	With respect to "Other Printed Paper", there needs to be a provision made to exclude certain printed papers, such as Christmas wrapping paper and gift cards, as well	Comment noted. Some municipalities accept toilet paper cores as boxboard and gift cards as household paper. Acceptability of wrapping paper depends on the specific

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	<p>as toilet core rolls, which create quality issues for mills that municipalities are left to deal with.</p>	<p>product design.</p>
<p>Bill Waddell, Waste Management</p>	<p>Slide 46 is an example where it discussed the risk of explosions in the balers. Baler explosions and associated material fires are very common. The Peel MRF which handles aerosol cans has between 5 and 15 explosion/baler fires per year mostly in the summer. This is a major risk to the Region's and the Province's infrastructure. If one of these fires was to spread to the receiving area or the baled product area the entire MRF and possibly even the composting and transfer station could be destroyed. This does not have a high probability of occurring but the impact would be very significant and as a result the risk rating is high. MRFs with the baling area closer to the receiving or storage areas would be at higher risk if they accept aerosol cans. This is a risk management issue so its a little different than some of the other barriers and less likely to be brought forward but the WDO has already identified this as an issue. It should be addressed as quickly as is possible to reduce the danger to MRFs taking on aerosol cans as a new stream and to assist those currently dealing with the issue.</p>	<p>Regarding the potential explosion risk associated aerosols and pressurized fuel containers, based on information available from operators, it would appear that this risk can be managed by ensuring that all parties are aware of the potential risk, by educating residents to keep potentially explosive containers out of the Blue Box collection system and instead to manage these containers through the MHSW collection system, and having MRF operators implement standard operating procedures to manage the potential explosion risk.</p>
<p><b>Broader Sustainability Issues</b></p>		
<p>Stephen Schildt, Solo Cup Canada</p>	<p>1) In the discussions, within the Blue Box there are materials under consideration for collection that may go to Korea for processing. Is there a science behind decisions, and there are implications for the collection truck, sorting, and transportation to Korea. Is sending material to Korea the right thing to be doing?</p> <p>2) Blue Box Materials are commodities and the program is faced with the challenges of commodities. When the</p>	<p>1) Comment noted.</p> <p>2) WDO has not undertaken a lifecycle analysis. Comments regarding local markets arise from concerns about</p>

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	markets collapse we must look for a market for the materials. Where processing facilities in North America that have gone under, one market that is sustained is in Korea. Has a broader environmental lifecycle analysis of this export option been undertaken?	transportation contributing to carbon emissions.
Peter Jacobs, citizen	<p>1) I believe that the greatest problem facing us is the diversity of materials. Is there any organization that is trying to get together with manufacturers and find common links to get less diverse products out there and make the amount of things consumed smaller?</p> <p>2) Is there an organization in the global economy? There is no consistency in products used to package anything. Should there not be some body (UN) that looks at this? We're not getting there currently.</p>	<p>1) Ontario represents a small market in a global economy. Ontario has limited ability to influence product and packaging design intended for multiple markets.</p> <p>Manufacturers consider end of life management as one of a range of factors that must be considered when delivery a product to market. The packaging industry is increasingly considering sustainability including end of life management.</p> <p>2) The Canadian Council of Ministers of the Environment (CCME) recently announced a number of packaging initiatives. Canada's federal government is best positioned to address packaging issues as Canada represents a larger marketplace than an individual province.</p>
<b>Costs</b>		
Catherine Able, Food & Consumer Products of Canada	<p>1) Which widely collected and not-so widely collected materials represent lowest cost for not so low return?</p> <p>2) Would it be worthwhile to consider the bigger bang for the buck?</p>	<p>1) The report estimates increased collection and associated costs, which could be used to calculate cost per tonne. However, an assessment of return for investment may need to consider a broader range of issues. WDO has not carried out this broader assessment.</p> <p>2) Comment noted.</p>
Andy Campbell, CIF (AMO)	Has the estimated amortized capital costs of the enhancements to MRFs required to process the additional materials been included in the cost estimates	The cost estimates are based on cost data reported by municipalities in the 2008 Datacall. Cost data include both operating and amortized capital costs. The resulting cost per

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	presented in the Draft Report?	tonne therefore includes both operating and amortized capital costs. The cost estimates are based on historic costs rather than the marginal or incremental processing and capital costs associated with managing the additional material.
Milena Avramovic, Association of Municipalities of Ontario	For rural members, the impact of consistency of materials will have a cost impact on individual municipalities, especially smaller communities.	<p>The draft recommendation suggests that consistent collection apply only to municipalities over 5,000 people. Most municipalities in the north between 5,000 to 15,000 people already have curbside collection for many of these materials.</p> <p>WDO did not estimate costs by Municipal Program Group as an assessment of individual collection and processing systems would be required and the timeline did not permit that level of detailed analysis. Costs based on estimated increased tonnage and gross historic costs per tonne represent system cost estimates but are not an accurate reflection of cost implications for individual programs.</p> <p>The MOE is currently consulting on the WDA review, including the possibility of transitioning the Blue Box Program Plan to full EPR. Under full EPR, costs for consistent collection of materials would be the responsibility of stewards.</p>
<b><i>Roles and Responsibilities</i></b>		
Cathy Cirko, Canadian Plastics Industry Association	<p>1) At the policy level, the MOE issued a discussion paper and talked about recycling targets on materials and consistency of collection. What is the position on recycling targets by materials?</p> <p>2) With respect to barriers in the markets, for polystyrene and overcoming them? There are barriers in sorting. On a yearly basis, on average, there are \$8</p>	<p>1) The MOE is consulting on the WDA review concurrently with WDO's consultation on consistency of materials. WDO is not considering targets in the consistency of materials recommendations. WDO's earlier recommendations submitted to the Minister in April 2009 related to the BBPP review included program and material specific targets.</p> <p>2) Fees are addressed by Stewardship Ontario as part of their budget and fee setting process. The BBPP fee setting methodology allocates total annual system costs based on</p>

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**Consistency of Material Collection: November 24<sup>th</sup> Workshop/Webcast Questions & Comments**

Name & Affiliation	Question	WDO Response
	million based on fees on these materials above the cost of recycling them in today's Blue Box system. Is there some thought given to using that \$8 million to address the sorting issues and barriers so that there are opportunities to recycle these materials at depot?	three factors, including performance, and shifts system costs from lower performing materials to higher performing materials. Costs to address the sorting issues and barriers identified in the report would be in addition to the current system costs.
Gord McKay, Zero Waste Simcoe	The Minister is currently reviewing the WDA, including the likelihood of a significant change of mandate for the WDO and the Blue Box. How does this review affect today's planning exercise for the Blue Box?	The draft recommendations are framed by the existing Waste Diversion Act and Blue Box Program Plan. Until an amended WDA is approved and the Minister sets out a new direction, WDO and Stewardship Ontario will continue operate under the existing framework.
Andy Campbell, CIF (AMO)	<p>Comment to municipalities: That the recommended changes, regarding materials to be collected, may require changes to their facilities. He noted that the Continuous Improvement Fund has money to support municipalities to make changes as required. He suggested that municipalities budget for these changes in their 2010 budget, and apply to CIF for financial support.</p> <p>Regarding the recommendations from WDO to the Minister regarding considering overall contamination/residue quantities (including those from downstream processing) when calculating recycling rates – is that consideration still there? Some current processors have contamination/residue at a 40% rate</p>	<p>Comment noted.</p> <p>The issue of tracking to final destination and tracking contamination/residue at downstream processors and/or markets is not addressed in the consistent materials draft report. WDO's earlier recommendations to the Minister related to the BBPP Review included a recommendation that stewards be responsible for this tracking under full EPR. Currently, municipalities are responsible for marketing materials and responsibility rests with municipalities to require tracking to final destination.</p>
Anne Winning, City of Hamilton	Who will be responsible for finding the consistent markets to facilitate the consistent collection of all the items that you are recommending?	Currently Stewardship Ontario is responsible for market development.
Stephanie Jones, Canadian Restaurant	These recommendations will be revisited in a broader vision for diversion in Ontario. Will this be done	At the direction of the Minister, WDO is developing revisions to the Blue Box Program Plan and recommendations on two

**Table 1**  
**Consistency of Material Collection: November 24<sup>th</sup> Workshop/Webcast Questions & Comments**

<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
and Foodservices Association (CRFA)	through the MOE or WDO? Where is the overall vision? How will these recommendations come together, and how will the loose ends be wrapped into a final report?	material management issues. WDO will be reporting back to the Minister by April for the BBPP revisions and by February for the material management issues. Meanwhile, the MOE is consulting on possible revisions to the WDA. The Minister is responsible to integrating the results of the MOE's consultation and recommendations received from WDO. .
<b>Other Topics</b>		
Joe Hruska, Hruska & Associates	<p>1) There are costs associated with improving systems to deal with foam and plastics. Have the costs of these materials, base level costs incurred by Stewardship Ontario, been ground truthed?</p> <p>2) For film and polystyrene, the City of Hamilton has a film grabber that has helped their process. They would be reluctant to pull film out of the blue box. They also collect polystyrene. How will these communities be affected by this decision – will they be forced to stop collecting these materials, or will they be allowed to continue?</p> <p>3) It is fair to say for this report that a film grabber and air knives are expensive tools for handling film and polystyrene. Were future systems considered? The report appears to look at the status quo. What consideration was given to what the next 10-15 years of the Blue Box was going to look like.</p> <p>4) I suggest we can recycle polystyrene crystal because</p>	<p>1) WDO utilized verified 2008 municipal costs, allocated to specific materials by Stewardship Ontario using the approved methodology for cost allocation to determine material specific stewards' fees.</p> <p>2) WDO has reviewed Hamilton's film grabber and remained unconvinced that this technology is the solution to removing film from other materials collected at curbside. Options that will be considered include:  a) depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service;  b) municipalities with curbside service would be required to transition to depot; or  c) municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome..</p> <p>3) WDO did not undertake an exhaustive search for new technologies. Rather, the report references known or emerging technologies and suggests continued monitoring of technology developments. When technologies to address identified barriers become available, recommendations can be revisited.</p> <p>4) Although there is a market for polystyrene crystal, recycling</p>

**Table 1**  
**Consistency of Material Collection: November 24<sup>th</sup> Workshop/Webcast Questions & Comments**

Name & Affiliation	Question	WDO Response
	<p>it has a market.</p> <p>5) Have you considered best practice? Some representatives of markets have suggested a two-stream system is better.</p> <p>6) Can you bag materials such as polystyrene? I suggest that those materials could be bagged by householders, presorted and sent to end market.</p>	<p>it consistently is inter-dependent on the market for thermoform PET as the householder cannot differentiate between these two materials.</p> <p>5) Consideration of consistent materials is focusing on the materials being collected not the method of collection.</p> <p>6) Reports from MRF operators suggest that receiving materials in bags is problematic as the bags may contain other types of recyclables or garbage and therefore must be opened for quality control. Placing items in bags for curbside collection does not facilitate MRF sorting.</p>
<p>Fred Edgecombe, Environment and Plastics Industry Council (EPIC)</p>	<p>1) Have you calculated MRF capacity across the province?</p> <p>2) Will achieving the 2011 goal of 70% require additional processing capacity? The lack of MRF processing capacity may be the “Achilles heel” for these recommendations.</p> <p>3) Slide 33 refers to “potential residue management options”. There are other good options. For example, in Edmonton, to deal with residues from composting and recycling, gasification/ethanol production is used. In Ontario thermal treatment does not seem to be an option.</p>	<p>1) No.</p> <p>2) Stewardship Ontario is currently working to revise the BBPP and it not yet clear if increasing the recycling target to 70% requires new processing capacity. The additional diversion may be achieved through tracking of collection and processing already occurring by charities or private collectors.</p> <p>3) Comment noted.</p>
<p>Melanie Vollick, Environment Network</p>	<p>Where do the blue box items go to when they are sorted? Is there one site or more?</p>	<p>Following collection, Blue Box materials are processed at more than 50 Material Recovery Facilities (MRFs) in Ontario. These MRFs sort Blue Box materials into various categories to meet specifications set by companies that purchase the processed materials either to recycle into new products (e.g.,</p>

**Table 1**  
**Consistency of Material Collection: November 24<sup>th</sup> Workshop/Webcast Questions & Comments**

Name & Affiliation	Question	WDO Response
		newsprint sent to a pulp mill where it is pulped and made into new fibre products) or processed further to produce derived materials that can then be recycled into new materials (e.g., PET bottles sent to a processor that turns the bottles into clean flake PET resin that can then be made into new products).
Phil Jenson, Genivar	The gentleman asking the question about long distance shipping might be asked what decision making process is used to put that material in the marketplace to begin with.	Comment noted.
Catherine Abel, Food & Consumer Products of Canada	<p>1) Was the purpose of the research to determine how to meet the 70% diversion rate, or to put forward recommendations that will take place while the system is transitioning to 100% EPR?</p> <p>2) In earlier discussions regarding harmonized collection it was noted that it was premature to be providing recommendations when we don't know what the targets will be or what materials it will apply to. In the absence of this information, how do we make recommendations regarding material specific targets? Is it appropriate, given the shifting of responsibility, that this is premature?</p>	<p>1) The request from the Minister included both revising the BBPP to achieve 70% diversion and recommendations on two material management issues. These tasks are being addressed in separate parallel tracks rather than as a single combined issue. Regarding transition to 100% EPR, WDO is operating under the current WDA and the current BBPP.</p> <p>2) The Minister asked for recommendations regarding consistent collection of materials. WDO provided recommendations on material specific targets in an earlier report submitted to the Minister in April 2009. The Minister will determine if he wishes to proceed with any WDO recommendations.</p>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
<b><i>Support for Recommendations</i></b>		
Peter Hume, President, AMO	AMO agrees that requiring consistent collection of a greater variety of materials would reduce public confusion; optimize the return from province-wide promotion and education programs and ultimately generate greater diversion.	Comment noted.
Rob Rivers, Director of Waste Management Services, Halton Region	Halton Region supports the list of acceptable fibres, containers and other items recommended as the province-wide consistent Blue Box materials list.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff support the definition of consistency for printed paper and packaging provided on page 4 of the document and recognize that once full EPR/Industry funding is in place standardization of materials collected should be consistent across municipalities.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff agree in principle with the requirement to provide consistent collection whether curbside or depot/return to vendor in both Southern and Northern Ontario for populations of 5,000 people or more.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff recognize that confusion can arise from inconsistent collection of materials between neighbouring jurisdictions and strongly supports province-wide communication.	Comment noted.
Norman Lee, Director Waste Management, Region of Peel	Generally, we are supportive of the overall direction being recommended in the discussion paper.	Comment noted.
Jay Stanford,	The City of London generally supports the findings and	Comment noted.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Director Environmental Programs & Solid Waste, City of London	recommendations found in the report as they will provide the benefit of greater certainty to municipalities in our planning processes for collection, communication & education (C&E) and Material Recovery Facility infrastructure to manage our Blue Box recyclable materials.	
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	The City agrees with the criteria/definition for consistent collection as it mirrors our planning for the collection and processing of new materials	Comment noted.
Cathy Cirko, Vice-President, Canadian Plastics Industry Association	The Canadian Plastics Industry Association (CPIA) has long advocated that there be increased consistency regarding the collection of plastics across the Province of Ontario. As a result we commend the efforts of the WDO to in part recommend that such happens.	Comment noted.
Stephanie Jones. Canadian Restaurant and Food Services Association	CRFA is pleased by recommendations to ensure consistency of collection going forward.	Comment noted.
<b>Comments re Specific Materials: Aluminum</b>		
Andrew Pollock, Director Waste Management Services, Niagara Region	The report recommends the addition of aluminum packaging and foil for consistent collection across the province. Some Blue Box Programs collect rigid foil packaging (e.g. pie plates) only and not flexible foil wrap because: foil wrap burns off in secondary aluminum smelters and is not recycled and because foil wrap is often highly contaminated and is difficult to manually sort in a MRF. Therefore, consideration should be given to only adding rigid foil packaging as an item for consistent collection	Comment noted. Further investigations into recycling aluminum packaging and foil will be conducted.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
Jake Westerhof, Canada Fibers Ltd.	Table 4.3 describes empty aerosols as not having constraints. Aluminum aerosols are a health & safety concern at both the MRF and end market. Empty aerosols containers lead to bale fires and cannot be included with other aluminum containers. Consideration should be given to include with the MHSW Program depot collected materials.	It is WDO's understanding that problems in balers typically result from explosions of fuel cylinders that were incorrectly placed in the Blue Box system rather than from empty aluminum (or steel) aerosol containers. The report recognizes that fuel cylinders and aerosol containers that are not empty should be managed in the MHSW collection system.
Laura McDowell, Director Env. Promotion & Protection, York Region	Aluminum packaging and foil have significant challenges associated with processing and marketing. These aluminum materials are separated from aluminum cans through a manual sorting process and can create marketing difficulties.	Comment noted. Further investigations into recycling aluminum packaging and foil will be conducted.
<b><i>Comments re Specific Materials: Gable Top and Aseptic Containers</i></b>		
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	Gable top & aseptic containers were not recommended for consistent collection until acceptable market(s) are confirmed. While it may be more convenient to lump these types of containers together, there may be good reason to assess the market constraints for each container separately. It is our understanding that there are a number of paper mills in Ontario that would be willing to accept gable top containers but are unwilling to accept aseptic containers.	Whether tissue mills pulp gable top separately or together depends on the pulping and screening technology employed in the mills. Modifying Ontario MRFs to separate these two materials would be challenging. There are mills in North America and Korea that are able to pulp these two materials together.
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	On page 1 under the heading "Consistent Collection," we note and support the recommendation to broaden the collection of aseptic and gable top cartons across the province in municipalities with a population of at least 5,000 people.	Comment noted.
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	Further to point 1 above, and to expand on what is stated in the Consistency Document about current markets for aseptic and gable top cartons, we wish to point out that there is not just one off-shore market (tissue mill) in Korea for aseptic and gable top cartons, there are at least nine of them. There are other similar	The text will be edited to reflect this new information.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	mills in Malaysia, Italy, Mexico, and South Africa. Additionally, Tetra Pak has developed North American markets to complement the global outlets. We can report that in addition to global outlets, there are currently three tissue mills in the United States that are recycling aseptic and gable top cartons, and two of them (SFK and Great Lakes) are accepting carton loads from Canadian sources for this purpose.	
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	On the question of aluminum and foil residuals left over from the repulping process, Mr. Fielkow and Mr. Moore reported that these are incinerated in the Korean mills for their energy value.	Comment noted.
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	A Quebec group, RCM, will begin using post-consumer plastic bags, film, and beverage cartons (any mix of aseptic and gable top) at its plant in Yamachiche to produce a low-cost resin that manufacturers can use produce a wide variety of plastic products.	Comment noted.
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	The key point of our submission is to emphasize that all the conditions exist at the present time to support the expansion to consistent collection of aseptic and gable top packages across the province in municipalities with a population of 5,000 or more.	Operating standards at offshore markets should be confirmed before consistent collection is implemented.
<b><i>Comments re Specific Materials: Aerosols and Paint Cans</i></b>		
Douglas Konrad, SWS Manager, County of Wellington	SWS staff agree with the proposed list for consistent materials as identified in the summary, with the exception of empty aerosol cans and empty paint cans. SWS staff are very concerned about the health and safety risk to curbside collectors and material recovery facility (MRF) staff when aerosol containers are compacted and/or baled.	It is WDO's understanding that health and safety problems typically result from explosions of fuel cylinders that were incorrectly placed in the Blue Box system rather than from empty aerosol containers. The report recognizes that fuel cylinders and aerosol containers that are not empty should be managed in the MHSW collection system.
Laura McDowell, Director Env. Promotion &	York Region staff have identified aerosol and paint cans as problematic materials for processing as aerosol cans can be made from either aluminum or steel and paint	Comment noted.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
Protection, York Region	cans can be made from either plastic, steel or composite. Due to the inconsistency in the material composition, the consistent collection of this material type should be re-evaluated.	
<b><i>Comments re Specific Materials: Thermoform PET and Other Rigid Plastics</i></b>		
Jake Westerhof, Canada Fibers Ltd.	Thermoformed packaging is growing and will soon represent a large percentage of the plastics packaging group. Thermoforms are clearly a problematic material that should be addressed immediately.	Efforts by Stewardship Ontario and the CIF to develop market options for thermoform PET are presently on-going.
Laura McDowell, Director Env. Promotion & Protection, York Region	Sorting, processing and marketing of Thermoform PET (#1), Polystyrene Crystal (#6) and other Rigid Plastics (#7) pose specific challenges and York Region staff agree that further steward supported research is necessary to resolve barriers to recycling and the development of reliable markets for these materials.	Efforts by Stewardship Ontario and the CIF to develop market options for thermoform PET are presently on-going.
Norman Lee, Director Waste Management, Region of Peel	We support the eventual addition of Thermoform PET (#1), Polystyrene Crystal (#6), and Other Rigid Plastics (#7) in the Blue Box Program, provided municipalities do not incur the additional costs to introducing these materials to the recycling stream if the materials are added prior to the transition to full producer responsibility.	Comment noted.
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	Thermoform PET does not have a single existing market to process this material. It is beyond comprehension that we allow items to be added to the Blue Box, financed by Ontarians, without a single acceptable market to divert the materials.	Efforts by Stewardship Ontario and the CIF to develop market options for thermoform PET are presently on-going.
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	It was discussed in the consultation session that polystyrene crystal and thermoform PET are hard to differentiate during the sorting process. Any market developed for one material will have to be willing to take both, which makes it even more challenging to market.	Comment noted. They are hard to sort manually but can be sorted with optical sorting equipment.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	With regards to the collection of PET thermoform, PS Rigid/Crystal and other Rigid Plastics, the City of London does not accept these packaging materials in the Blue Box due to no markets for PET Thermoform and our MRF's inability (no optic sort installed) to sort these materials into marketable streams. We support the recommendations not to add these materials until markets are developed for the PET Thermoformed.	Comment noted.
Andrew Pollock, Director Waste Management Services, Niagara Region	Section 4.3.6: other Rigid Plastic Containers (pg. 19) - The report focuses on SPI Code #7 (Other) plastics only and does not address SPI Code #3 (PVC) plastic packaging. Thermoform PVC packaging is a growing packaging category that should be included in any discussion of other rigid plastics.	Thermoform and other forms of PVC (SPI Code #3) will be considered.
Martin Vogt, EFS-Plastics Inc.	Even though PET thermoform has no home, it needs to be isolated so that the rest of recyclable plastics can be processed. PET thermoform ends up in landfill anyway.	Comments re separation of thermoform and bottle PET noted. Efforts by Stewardship Ontario and the CIF to develop market options for thermoform PET are presently on-going.
Cathy Cirko, Vice- President, Canadian Plastics Industry Association	We are pleased with the approach that the WDO is taking with regard to thermoformed PET.	Comment noted.
<b>Comments re Specific Materials: Film</b>		
Martin Vogt, EFS-Plastics Inc.	Comments provided in the form of a Power point presentation on "Raw Material Supply". The key comments and suggestions in the presentation, stemming from the conclusion that there will be a shortage of recovered film and mixed plastics are as follows: 1) A Depot based collection system for Film (as per " <b>Report on Greater Consistency of Recyclable Material Collection</b> ") would be the wrong direction, since quantities would decrease, not increase	1) Comment noted. Options under consideration include: <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; or</li> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</li> </ul>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	<p>2) WDO/SO need to do more to guarantee raw material supply for approved projects. Municipalities need to commit to a local solution with long-term contracts.</p> <p>3) The price FOB MRF should be at a fixed cost, so Municipalities are willing to provide contracts, allowing the local industry to have a chance to invest and develop.</p> <p>4) It is not correct, if costs for waste, waste water and hydro has to be paid by the local industry as per Ontario standards, while at the same time the industry has to compete with Brokers, who are going against long-term contracts, and shipping these materials overseas.</p> <p>5) If volumes are available an industry will be automatically developed.</p>	<p>2) Comment noted. Should the Minister follow WDO's recommendations and mandate the collection of additional materials, the quantity and reliability of material supply should improve. Market mechanisms determine which processor receives this supply.</p> <p>3) Market mechanisms determine the prices paid for recyclable materials.</p> <p>4) Market mechanisms determine the prices paid for recyclable materials. In the absence of trade barriers and tariffs, domestic businesses, that pay local costs for inputs, compete with offshore competitors who have different cost structures. The report recommends that audits of offshore processors/markets be conducted to ensure that they adhere to environmental and labour standards that are comparable to Ontario's.</p> <p>5) Comment noted.</p>
<p>Pat Parker, Acting Director Support Services, City of Hamilton</p>	<p>With the recent installation of a \$2.7 million state-of-the-art container processing line at the City of Hamilton's Materials Recycling Facility staff does not support the collection of LDPE/HDPE film at depots as recommended in this paper.</p>	<p>The reported relative low capture of film by this new equipment was one of the reasons for recommending the collection of film at depots.</p>
<p>Jay Stanford, Director Environmental Programs &amp; Solid Waste, City of</p>	<p>In the case of film plastic, local retailers and grocers accept only plastic retail bags for recycling. With regards to film packaging that will have to be accepted, this needs to be clarified.</p>	<p>Clarification will be provided.</p>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
London		
<b>Comments re Specific Materials: Polystyrene Foam</b>		
Ray Ehrlich, Dart Container Corporation	Is WDO recommending that municipalities that currently have curbside blue box collection of both polystyrene foam pillow packaging and/or meat trays and other foodservice products (which represent over 50% of the population in Ontario) move from a curbside collection of polystyrene foam system to a depot collection system in three years, or is the recommendation only for those municipalities that do not currently collect these polystyrene foam products?	<p>Comment noted that greater clarity is required in the recommendations on how programs currently providing curbside collection of film and polystyrene would operate under a system of consistent collection. Options under consideration include:</p> <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; or</li> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</li> </ul>
Ray Ehrlich, Dart Container Corporation	Could the WDO clarify all of Section 4.3.8 regarding the two distinctly different streams of polystyrene foam: pillow packaging vs. meat trays and foodservice products? For example, is WDO recommending that municipalities that currently have curbside blue box collection of polystyrene foam products continue but only accept polystyrene meat trays and other foodservice products, and that polystyrene foam pillow packaging only be collected at depots?	Differences between pillow packaging and meat trays / foodservice products are noted but, as discussed in Section 4.3.8, there are challenges associated with both materials. WDO will consider differences between these two forms of polystyrene foam packaging when considering recommendations on consistent collection.
Ray Ehrlich, Dart Container Corporation	If the recommendation for depot collection of polystyrene foam (again, is this for pillow packaging or meat trays and foodservice products) is just for municipalities that currently do not collect either of these polystyrene foam products, what will happen to those existing polystyrene foam curbside programs? Will they still be eligible to be funded by the fees	<p>Comment noted that greater clarity is required in the recommendations on how programs currently providing curbside collection of film and polystyrene would operate under a system of consistent collection. Options under consideration include:</p> <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to</li> </ul>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	collected by Stewardship Ontario? If not, this would likely cause municipalities to discontinue these already established curbside collection programs and would significantly effect the amount of PS diverted as a result. Would there be the possibility of "grandfathering" current curbside polystyrene recycling programs into the programs to be funded by the Stewardship Ontario fees in order to maintain them?	<p>provide curbside service; or</p> <ul style="list-style-type: none"> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</li> </ul> <p>The cost of collecting and processing this material would continue to be funded by fees collected by Stewardship Ontario.</p>
Ray Ehrlich, Dart Container Corporation	Has the WDO undertaken a financial impact study with respect to the polystyrene recycling markets (CPRA and W.R. Grace) on the effects of the potentially lower amount of material collected and processed by the move to a depot collection-only system for polystyrene foam?	WDO is projecting that more, not less, polystyrene foam will be collected and marketed. The specific impact of this change in quantities on specific companies such as CPRA and W.R. Grace has not been assessed.
Ray Ehrlich, Dart Container Corporation	Has the WDO determined where the polystyrene collected at the province-wide depots will go (e.g., to transfer station, directly to end market, etc.), how it will get there and in what form (e.g., baled, densified, Gaylord containers/bags, etc)?	Due to the time constraints created by the Minister's February 28, 2010 deadline, detailed analysis on how each municipal program will be modified to handle consistently collected material has not been done.
Ray Ehrlich, Dart Container Corporation	Page 23, Key Benefits and Barriers Table: Shouldn't the entry in the 3rd row of the 1st column read "Polystyrene Foam (#6) Collected at depot" rather than "...collected at curbside". It is redundant as currently stated.	The lower left cell in the table will be changed to read "Polystyrene Foam (#6) Collected at depot".
Ray Ehrlich, Dart Container Corporation	Page 23, 1st para: Would you please provide additional information on the baling of depot-collected polystyrene foam (e.g., where would the baling take place – at each depot site, or at a regional/central	Due to the time constraints created by the Minister's February 28, 2010 deadline, detailed analysis on how each municipal program will be modified to handle consistently collected material has not been done. Should the Minister decide to implement WDO's recommendations, the parties responsible

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	consolidation point/transfer facility?)	for the various recycling programs across the province will decide how to complying with the Minister’s requirements.
Ray Ehrlich, Dart Container Corporation	Page 23, Key Benefits and Barriers Table: The last column needs to be clarified. Shouldn’t the title cell say ” Key Barriers to Consistent Collection and Processing, as the 1st and 4th bullet points pertain to collection and the 2nd and 3rd bullet points pertain to processing.	The heading of the right column of the table on Page 23 of the November 17 <sup>th</sup> draft will be changed to “Key Barriers to Consistent Collection” to be consistent with the other tables in Section 4.3. The Minister’s letter to WDO of August 14 <sup>th</sup> referred to “greater consistency of materials collected”. There is a implicit assumption throughout the WDO report that with collection comes processing and material marketing.
Ray Ehrlich, Dart Container Corporation	Page 23, Key Benefits and Barriers Table: The first bullet point in the middle cell of the last column should be clarified to say “Curbside collection of polystyrene foam pillow packaging inefficient” (Page 22, 3rd para.) since this is not the same as “polystyrene foam trays used to package meat and other food products”, which pose no anticipated problems with collection at curbside or drop-off collection facilities (Page 22, 5th para).	The first bullet point in the middle cell of the last column will be changed to say “Curbside collection of foam pillow packaging inefficient”.
Ray Ehrlich, Dart Container Corporation	Page 24, last para in section 4.4: This para should be clarified – the first sentence should read “Similarly, the depot based collection of polystyrene foam pillow packaging was recommended because of the inefficiencies associated with collecting this very light, bulky material curbside.” The statement, as is, does not apply to polystyrene foam meat trays and other foodservice products which pose no anticipated problems with collection at curbside or drop-off collection facilities (Page 22, 5th para).	The last paragraph on Page 24, in section 4.4, will be revised to reflect the differences in the constraints associated with pillow packaging and foam meat trays / other foodservice products.
Ray Ehrlich, Regional Manager, Dart Container Corporation	CPRA (renamed the Canadian Polystyrene Recycling Alliance) now has the capacity to recycle the used polystyrene that can be collected from all the households in the province, with this group of companies – which recover and re-manufacture post-consumer and post-industrial polystyrene into picture	Comment noted.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	frames and other decorative mouldings – providing CPRA with a built-in market for the recycled polystyrene right in Ontario.	
Ray Ehrlich, Regional Manager, Dart Container Corporation	Dart requests that WDO more clearly identify, and give further consideration to, the important differences between pillow packaging and foam meat trays/foodservice packaging in the revised report to be sent to Minister Gerretsen. These differences will have a significant effect the recommendations on the consistent collection of these materials	The differences will be identified and considered.
<b><i>Comments re Specific Materials: Other Materials</i></b>		
Andrew Pollock, Director Waste Management Services, Niagara Region	<p>Section 4.1.1: Paper Fibres (pg .. 8) - Consideration should be given to exclude certain low grade printed papers, such as Christmas wrapping paper and gift cards, which contain foil laminates and inks that cause problems for paper mills . These materials should be placed in the garbage stream.</p> <p>Consideration should also be given to excluding certain low grade paper packaging such as toilet paper cores and paper towel cores which also create contamination issues at paper mills. Paper cores are more appropriately handled in the Green Bin Program</p>	<p>Paper laminates are not recommended for consistent collection.</p> <p>The current BBPP does not consider composting as a diversion option. Composting has been recommended by WDO as a diversion option to be included in the BBPP.</p>
Andrew Pollock, Director Waste Management Services, Niagara Region	Section 4.2: Materials Presently Not Solicited for Collection (pg. 10) The report should clarify whether composite packaging (e.g. plastic blister packaging with a boxboard backing, boxboard toy packaging with a large plastic window) is included under paper laminates, plastic laminates or both categories	Greater clarity regarding composite materials will be provided. A comment will be added that boxboard backing can be removed from blister packaging for recycling.
Andrew Pollock, Director Waste Management Services,	The report also recommends the addition of HDPE (#2) containers for consistent collection across the province. Since HDPE resin is used for blow-moulded bottles and jugs, and for injection-moulded tubs and pails, the	Comment noted. Further investigations into recycling of blow-molded and injection-molded HDPE will be conducted.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Niagara Region	report should clarify that only HDPE bottles and jugs are being recommended for consistent collection. Furthermore, the report should clarify that HDPE tubs and pails are included in the tubs and lids category.	
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff have identified spiral wound containers containing paper laminates, metal and/or plastic as problematic material for processing and request clarification on the classification and proposed handling of these types of containers in the absence of a viable market	These packages are both laminate and composite and are not recommended for consistent collection.
Stephanie Jones. Canadian Restaurant and Food Services Association	In addition to the materials identified in the consultation document for harmonization, paper laminates must be included.	Paper laminates are not recommended for consistent collection. These materials may be addressed through the problematic materials process that will be recommended to the Minister.
Stephanie Jones. Canadian Restaurant and Food Services Association	CRFA would like to echo the presentations made during the consultations regarding hot drink cups and urge that this obligated, fee paying material be identified as a material included for consistent collection.	The issue of consistent collection of hot drink cups and lids will be considered.
Greta Najcler, Manager Env. Affairs TDL Group (Tim Hortons)	The reality is that many materials and packaging can be recycled but are not accepted for recycling in municipal blue box systems for reasons that are not actually related to the material from which they are made.	Comment noted. Materials are typically excluded from the Blue Box collection system due to material handling problems, lack of market demand or the net cost of handling.
<b><i>Link to Process Recommended for Problematic Materials</i></b>		
Bill Waddell, Waste Management	As a suggestion, the Barriers to Consistent Collection formally identified in the Consistent Collection of Blue Box Materials documents should all be reviewed by the Problematic Materials Steering Group and prioritized to be addressed without the requirement for the process to Identified Problematic Materials. The requirement for a party or parties to present these issues to the Steering Group and submit supporting information should be waived as these issues have already been formally identified by the WDO in Tuesday's	The problematic materials process is not yet operational. The draft report outlines a process that will be, when finalized, recommended to the Minister. The process includes the principle of treating all potentially problematic materials consistently. If implemented at the direction of the Minister, all problems would then be considered using a similar process. Waiving the requirement for a party (or parties) to present a possible problematic material, with supporting information, to

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	documents.	the Steering Group would not be consistent with the principle of treating all potential problems fairly.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff request clarification of materials that have been excluded from consistent collection versus those that are considered problematic.	A process for addressing problematic materials will be recommended to the Minister by February 28, 2010. The process would be implemented if directed by the Minister. Therefore no materials have been identified as problematic as yet.
<b><i>Depot Collection of Materials</i></b>		
Jake Westerhof, Canada Fibers Ltd.	The recommendation to collect Film Plastic & Expanded Polystyrene (EPS) at depots within 3 years should be accelerated. Depots (municipal & return to retail) already exist and the CIF has financed film processing capacity that will be ready in 2010.	The recommend timelines will be reconsidered.
Douglas Konrad, SWS Manager, County of Wellington	SWS staff agree with the proposed list and collection methods of additional materials to be collected as consistent markets and collection/processing capacity become available. While curbside collection may be preferable for some materials and depots for others, where depots are the preferred option, they must be established in convenient locations for the public, in facilities where the collection of a particular product makes sense such as the retail location where the product was originally purchased or at a designated depot where other materials are accepted.	Comment noted.
Rob Rivers, Director of Waste Management Services, Halton Region	Halton Region recommends that material take-back depots established in retail locations manage their program responsibly and have a transparent process for administering the program, marketing the material, handling customer service inquiries and reporting the amount of material that is received on a regular basis.	Comment noted.
Cathy Cirko, Vice-	We have concerns for the movement of certain plastic	Comment noted.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
President, Canadian Plastics Industry Association	materials now collected at curbside to depot collection.	
Cathy Cirko, Vice-President, Canadian Plastics Industry Association	A persistent argument regarding the collection of film at curbside has been its “so-called” high cost which is said to exceed \$2300 per tonne today. This cost was derived by activity based costing which was first carried out in 2004 where film gross costs were found to be \$1,330 tonne. In the intervening years the cost of dealing with film has increased out of all proportion with the increase in costs to deal with other materials. What are the reasons for this? Have the costs of collection and processing materials been reviewed recently and if so, was a comparison made between single and two stream MRFs and did the review represent a statistically reasonable sample of the MRFs across Ontario?	All cost information is based on activity based cost studies carried out by Stewardship Ontario. WDO is not aware of the film management costs referenced and cannot comment on the reasons for changes or the other cost issues raised.
Cathy Cirko, Vice-President, Canadian Plastics Industry Association	If over time, MRF design and new technology remove some of the impediments which you list regarding film, would the WDO consider moving film from depot back to curbside?	Consistent collection of film at curbside when the barriers have been addressed was included in the draft report recommendations.
Cathy Cirko, Vice-President, Canadian Plastics Industry Association	The collection of foam polystyrene is also being transferred from curbside to depot. Once again the potential volume of material collected will drop significantly.	Options under consideration include: <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; or</li> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</li> </ul>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Cathy Cirko, Vice-President, Canadian Plastics Industry Association	The WDO is silent regarding the design of depots. Mention is made of making use of municipal household special waste depots. These are not necessarily convenient for a large segment of the population living in large urban communities and as a result even the estimated return to depots for film and PS Foam may be high. <i>A much lower than expected capture would seriously jeopardize the viability of the existing re-processors.</i> In addition we suggest that the WDO recommend to the agencies associated with the WDO that they consider a project to design a multipurpose depot and give thought to where they should be located.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff support the future collection of LDPE HDPE Film (#2, #4) and Polystyrene Foam (#6) at depots rather than inclusion in curbside programs.	Comment noted.
Norman Lee, Director Waste Management, Region of Peel	We agree that LDPE/HDPE (#2,#4) and Polystyrene Foam (#6) are problematic when collected in the Blue Box and that collection through a depot system would help reduce the impacts to the Blue Box system. However, we recommend that the depot system be retail based where retailers would take these materials back at their stores.	Comment noted.
Norman Lee, Director Waste Management, Region of Peel	We believe that regardless of the policy, LDPE/HDPE (#2,#4) and Polystyrene Foam (#6) will continue to be placed in the Blue Box by some customers. In fact, since the depot system is unlikely to be very effective, we believe municipalities should be given the choice of including or excluding these materials until such time as the Blue Box Program has been transitioned to full	Options under consideration include: <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; or</li> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service</li> </ul>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	producer responsibility.	may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	The report recommends that other challenging materials should be collected at depots. It makes sense for valuable materials to be collected at depots and it has been this way for decades for glass bottles and aluminum cans. In fact, TEA encourages more deposit-return programs for Ontario and worked for many years to win a deposit-return program for the LCBO.	Comment noted.
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	At present, it is difficult to see the efficiency or value in dropping off and collecting LDPE/HDPE film and polystyrene foam from depots. Is it realistic to institute a deposit-return program for these unbranded materials? Without a deposit, there is no real incentive for consumers to make the added effort to bring them to depots.	Comment noted.
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	We believe that convenience and accessibility to capture film and PS Foam could be enhanced if the retailers and grocer programs accepted film and PS Foam at their locations in addition to the City depot locations.	Where consistent collection at depots has been recommended, depots include return-to-retail and other private depot locations, as well as municipal depot locations.
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	It is suggested in the report that depots will produce higher quality film and PS Foam recyclables, but we question the ability of depots to meet end market specifications unless these depots are staffed to supervise citizens dropping off film and PS Foam.	Comment noted
Jay Stanford, Director Environmental	With regards to the recommendations that LDPE/HDPE Film and Polystyrene Foam be collected at depots rather than curbside within three years, London agrees	Determining the level of municipal service (i.e., location and number of depots) is an area of municipal responsibility. It is anticipated that municipalities will consider the availability of

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Programs & Solid Waste, City of London	with this recommendation based on the collection and processing implications outlined in the report, but has concerns and questions. The report is silent on the level of service that municipalities will have to provide, and this needs to be clarified.	return-to-retail or other private sector depot collection systems operating within their jurisdiction.
Andrew Pollock, Director Waste Management Services, Niagara Region	Section 4.4 Additional Materials Recommended for Consistent Collection (pg . 23) -The report recommends that plastic film and foamed PS be collected through existing depots rather than curbside collection within three years. Use of the existing depot network would result in a significant decline in accessibility for Ontario residents and cannot be supported. If this option is to be considered, return to retailer depots would have to be established at all retailers that sell items packaged in plastic bags or foamed PS .	The recommended depot collection would include return to retail as well as municipal depots.
Allen Langdon, Vice-President, Canadian Council of Grocery Distributors (CCGD)	CCGD and our members are opposed to the transfer of plastic film and polystyrene foam from the Blue Box to a depot and/or return to retail collection system. From our perspective this action would significantly impact the collection rate of both materials.	Options under consideration include: <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; or</li> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</li> </ul>
Ray Ehrlich, Dart Container Corporation	If the WDO is recommending a change to a depot system for collection for polystyrene foam for all municipalities over 5,000, what impact will this have on the amount of material captured (in the bottom cell of the last row of the Key Benefits and Barriers Table on Page 23, it states that “depot collection will capture less material”)?	The quantity estimates associated with province wide consistent collection at curbside and at depots are provided in the table on page 23 of the November 17 <sup>th</sup> draft. The comment in the table “Depot collection will capture less material” is made in comparison with consistent collection at curbside not in comparison with current collection practice where polystyrene foam is not as widely collected as most

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
		other materials.
Ray Ehrlich, Regional Manager, Dart Container Corporation	We request that WDO change its recommendation from collecting all polystyrene foam products consistently at depots to the consistent collection of <i>polystyrene foam foodservice materials only</i> in Blue Box programs in the province, with pillow packaging to be consistently collected at depots.	Comment noted.
Ray Ehrlich, Regional Manager, Dart Container Corporation	<p>The fact that curbside collection is more convenient, has much higher participation rates and captures significantly more materials (up to three times more) than depot collection systems necessitates consistent collection of polystyrene foam foodservice materials only in Blue Box programs in the province.</p> <p>At a minimum, Dart requests that WDO revise the report to clarify that municipalities currently providing curbside service be able to continue this service with all other municipalities required to provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</p>	<p>Options under consideration include:</p> <ul style="list-style-type: none"> <li>• depot collection would be considered the minimum level of service and municipalities could choose to provide curbside service; or</li> <li>• municipalities with curbside service would be required to transition to depot; or</li> <li>• municipalities currently providing curbside service may continue but all other municipalities would provide depot service for these materials until such time as the identified barriers to curbside collection are overcome.</li> </ul>
Ray Ehrlich, Regional Manager, Dart Container Corporation	Prior to recommending consistent depot collection of polystyrene foam across the province, Dart requests that WDO perform a more complete, detailed analysis on how consistent collection of polystyrene foam packaging at depots will be implemented across the province. Issues such as storage of collected materials, potential densification/compaction of collected materials, transportation of material to intermediate processing, and transportation of material to end market must be examined in order to justify the recommendation of consistent depot collection.	Due to the time constraints created by the Minister's February 28, 2010 deadline, detailed analysis on how each collection location will operate has not been done.
<b>Markets for Materials</b>		

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Jake Westerhof, Canada Fibers Ltd.	How will WDO track recyclables to offshore markets and measure recycling net of all processing residues? Is WDO prepared to accept estimates based on normal operating process residue rates? Will data directly related to Ontario tonnage be required and if so how will the data be gathered and audited?	Under the WEEE, MHSW and Used Tires Programs, the IFOs are responsible for setting vendor standards for primary and downstream processors, tracking to final disposition and determining actual diversion and residue rates. Under the shared responsibility model of the Blue Box Program Plan, responsibility for tracking recyclables to offshore markets rests with municipalities.
Jake Westerhof, Canada Fibers Ltd.	Market development work should be undertaken in developing a sustainable domestic outlet for gable top/aseptic packaging. Work can be built upon the investigative work already completed by the Hot Drink Task Force established by the City of Toronto earlier this year.	Comment noted.
Rob Rivers, Director of Waste Management Services, Halton Region	When shipping and marketing recyclable materials, it is important to be environmentally responsible. Markets, especially those outside of Ontario, should be investigated and monitored to ensure they are operating at, or above, Ontario standards.	Draft recommendations included auditing operating standards at offshore markets before consistent collection is implemented.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff support the four principles for selecting materials for consistent collection, as outlined on page 5 of the document. Further, York Region staff suggest that a 5th principle be added stating a preference for North American processing facilities to minimize greenhouse gas emissions and to ensure processing takes place in jurisdictions where environmental and health and safety standards similar to or better than Ontario standards.	Comment noted.
Pat Parker, Acting Director Support Services, City of Hamilton	The collection of consistent materials would occur as reliable markets employing sound environmental and labour practices become available. Gable top cartons and aseptic cartons are good examples of such materials. Staff is not clear on who is responsible for	Under the shared responsibility model set out in the Blue Box Program Plan, Stewardship Ontario is responsible for market development and municipalities are responsible for marketing materials collected.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	securing these markets.	
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	One of the criteria discussed in this report is the ‘availability of sustainable markets’. What exactly defines a sustainable market if it cannot at minimum offer certainty of environmental and health/safety standards, meeting or surpassing diversion targets, and reliable Ontario markets? Some would go further to argue that the presence of competition is necessary for an economically sustainable market.	Draft recommendations included auditing operating standards at offshore markets before consistent collection is implemented. The intent is not to prevent competition but rather to ensure that markets are competing on the basis of similar operating standards.
Heather Marshall, Waste Campaigner, Toronto Environmental Alliance	This report recommends auditing the sole market for the mixed bales of gable top and aseptic in South Korea to confirm this as an acceptable market. Even if this market meets diversion targets and environmental and health standards, we should still not consider a single overseas market as ‘acceptable’.	Additional information has been received indicating that there are multiple mills in Korea as well as facilities in North America capable of processing these materials. Draft recommendations included auditing operating standards at offshore markets before consistent collection is implemented.
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	The City's main concern with the implementation of consistent collection and social marketing programs will be the impact of the added recyclable material volumes that will have to be marketed. Efforts must be made to minimize the risk of overseas market disruption and adverse environmental impacts as well as to support the development of local green technology to remanufacture recycled materials into new products that will benefit the Ontario and Canadian economy	Comment noted.
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	London is also concerned about end market capacity for film. The majority of film collected in the Province is currently shipped overseas. We understand there is a local market developing for film plastic but would suggest that the reduction in collection of film that will be collected through depots versus curbside recycling may impact investment in capacity for this market. This needs to be monitored and confirmed with the end markets before depot programs are implemented.	Comment noted. The comment “Depot collection will capture less material” is made in comparison with consistent collection at curbside not in comparison with current collection practice where film is not as widely collected as most other materials.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	We support the idea of an audit of the processing facility in Korea recommended in the Draft report. We also support WDO conducting similar audits at other tissue mills in Korea and the USA that recycle carton furnish, as long as any associated costs do not affect levies our customers are currently paying.	Comment noted.
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	We would like to request any information you may have detailing the sales of all commodity types being sold off-shore.	WDO does not have this quantitative information.
Santiago Fourcade, Managing Director, Tetra Pak Canada Inc.	We note as well that the document notes other materials from Ontario Blue Box programs (including tubs and lids, other rigid plastic containers, newsprint, boxboard, mixed paper) under certain conditions end up being recycled in facilities in Asia. We would like to ask why are there no recommendations to audit the facilities recycling these other materials as well?	The recommendation regarding audits will be extended to all offshore primary and downstream processing facilities receiving materials from Ontario.
<b>Promotion and Education</b>		
Jake Westerhof, Canada Fibers Ltd.	How will the province wide social marketing initiative be funded? Who will administer the fund? Has WDO considered using the “in-kind” advertising provided by newspaper publishers to broadcast the marketing plan? Can existing and well developed municipal P&E programs be involved to save costs? Estimated costs for the campaign seem excessive.	The funding of the recommended province wide social marketing effort has not been addressed. Details, such as use of the “in-kind” advertising provided by newspaper publishers, have not been considered. The estimated order of magnitude costs are conservative but deemed to be reasonable considering the potential use of mass market channels such as TV.
Jake Westerhof, Canada Fibers Ltd.	Primary goal of consistent collections should improve inbound material quality not increase capture. Any social marketing campaign must focus on improving inbound material quality. Residue rates in all MRFs can be reduced, cross contamination issues can be lessened and higher quality of material to market can be realized. Inherently, consistent collections will somewhat	The primary goals of having more consistent collection are to reduce confusion among householders regarding what is recyclable and to facilitate the province wide communications necessary to accomplish this. This in turn is expected to generate increased capture of material. The aspect of addressing improved inbound material quality can be considered in the design of the province wide social marketing

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	improve inbound material quality, but the marketing campaign should make quality of collected material a focus. This is the most important outcome of any social marketing campaign.	effort should the Minister adopt WDOs recommendations.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff would support the use of an "approved" list of images and words that can be used in all municipal promotion and education campaigns to ensure consistent messaging province-wide. York Region staff strongly suggests that a provincial committee be struck to develop this messaging and that a representative cross-section of Municipal waste managers be involved to build on the successes that have been achieved thus far.	Comment noted.
Rob Rivers, Director of Waste Management Services, Halton Region	Promotion and education (P&E) will have a significant role in developing a successful standardized Blue Box system. Halton Region recommends P&E be developed in a collaborative effort with the Stewards, the Province and Municipalities. Halton Region recommends a representative municipal group be established to assist with the development of P&E.	Comment noted.
Peter Hume, President, AMO	Promoting a simple but effective message such as "recycle all containers" would no doubt result in significant increases in collection and increased diversion but will also increase residue rates, plus the collection of non-recyclable and difficult to process containers that may end up as residue. Implementation of a continuous improvement schedule for the development of technologies to effectively overcome barriers and disadvantages associated with additional materials will reduce residuals and further improve diversion in the future.	Comment noted.
<b>Costs and Cost Analysis</b>		

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Joe Hruska, Hruska & Associates	<p>A question on the report:</p> <p>Q: Did WDO do all the costing, revenue estimates and recalculating of additional costs for the Consistency report?</p> <p>Q: I assume all costing is based on WDO financial datacall and SO crunching these numbers to get the final gross and net costs of system?</p>	<p>The methodology and information sources for the costing are provided in Appendix C of the Report on Greater Consistency of Recyclable Material Collection. In summary, the costs presented in the report are the material specific costs based on the 2008 Datacall utilized by Stewardship Ontario for setting 2010 stewards' fees multiplied by quantity estimates developed by WDO (see Appendix B for details on these quantity estimates). Details on the process used by Stewardship Ontario to determine the material specific costs (Gross Costs excluding Revenues and Net Costs including Revenues) for setting 2010 stewards' fees are provided on the Stewardship Ontario web site.</p>
Jake Westerhof, Canada Fibers Ltd.	<p>Why would gross system costs increase so significantly when only a modest 3-6% system wide recovery rate increase is expected? Gross system cost estimates seem excessive.</p>	<p>The methodology for estimating costs based on the use of current material specific gross costs is provided in the report. In general the additional diversion will come from diverting relatively light materials that are more costly to collect and process. The report notes that the cost estimates are conservative.</p>
Douglas Konrad, SWS Manager, County of Wellington	<p>The cost estimate in Section 5.3 of up to \$8 million (identified to be at the high end) does not seem sufficient to provide enhanced province-wide promotion of programs.</p>	<p>This communications cost estimate is in addition to current P&amp;E activities. It is considered a reasonable estimate based on discussions with communications experts.</p>
Peter Hume, President, AMO	<p>Full implementation of consistent collection will result in a plan to produce diversion rate increases of between 4.4% and 10.3%. The associated increase in gross costs is between 8.4% and 20.8%. The significance of these cost escalations underscores the need for implementation of EPR prior to implementation to avoid downloading more producer created costs onto municipalities.</p>	<p>Comment noted.</p>
Pat Parker, Acting Director Support	<p>The Gross Cost estimates of increases in the amounts of \$315 and \$350 million to implement the province-wide</p>	<p>Comment noted.</p>

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Services, City of Hamilton	consistent collection of materials, and the addition of a further \$3 to \$8 million for the province-wide strategic social marketing initiative, is a concern, given the current economic climate.	
Pat Parker, Acting Director Support Services, City of Hamilton	This draft for consultation paints the province of Ontario with a very broad brush stroke and the rationale to move towards collecting consistent of blue box materials across the province as directed by the Minister in theory sounds great however, has the potential to take years, and a great deal of money to implement.	Comment noted.
Shannon Coombs, President, Canadian Consumer Specialty Products Association (CCSPA)	CCSPA requests that the WDO, on behalf of the Minister of Environment, consider the <u>economic impacts</u> of the Recommendations and make necessary revisions to the Reports. Sustainability of the overall program needs to be considered when designing approaches to increase diversion. It is imperative that any revisions to the Blue Box Program Plan by the Government of Ontario be fiscally responsible.	The report considers estimated cost increases for the Ontario Blue Box system as a result of consistent collection.
Stephanie Jones. Canadian Restaurant and Food Services Association	The current blue box recycling system has been built on adding the next least cost tonne to the system. Under a model where costs are shared equally between municipalities and industry stewards, the nexus principal was not upheld. Under EPR the harmonization of municipal blue box collection cannot further condone this practice by embedding it in future regulations.	The nexus principle links specific Blue Box system costs to those stewards who supplied the products into the marketplace that resulted in those costs. The nexus principle is the basis of the steward fee setting methodology under the Blue Box Program Plan and has been applied on a continuous improvement basis throughout the period of shared responsibility for the Blue Box system.
Allen Langdon, Vice-President, Canadian Council of Grocery Distributors (CCGD)	CCGD and our members were also concerned about the omission of any detailed cost-benefit analysis that could help identify what materials provide the most significant opportunity for increasing diversion at the lowest cost per tonne.	Achieving the best improvement in diversion rates at the lowest cost per tonne was not a criterion employed by WDO. Rather, collection of consistent materials to facilitate province wide communications was the objective.
Catherine Abel, Vice-President, Food &	FCPC was also concerned to note that the WDO report did not conduct a cost analysis to determine which	Achieving the best improvement in diversion rates at the lowest cost per tonne was not a criterion employed by WDO.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
Consumer Products of Canada (FCPC)	materials could realize the best improvement in diversion rates at the lowest cost per tonne.	Rather, collection of consistent materials to facilitate province wide communications was the objective.
<b><i>Flexibility to Collect Additional Materials</i></b>		
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff appreciates the flexibility afforded for municipalities to collect and recycle additional materials if local capacity exists.	Comment noted.
Rob Rivers, Director of Waste Management Services, Halton Region	Halton Region recommends that "consistency" be defined as Blue Box materials that are uniform across the province and that supplemental materials cannot be added or removed by individual municipalities.	Comment noted.
<b><i>Consider Extended Producer Responsibility (EPR) and Potential Changes to the Waste Diversion Act (WDA)</i></b>		
Peter Hume, President, AMO	AMO supports the concept of an EPR system that assures "consistent collection" of printed paper and packaging materials. Timing of implementation is of concern. Implementation of these programs prior to full EPR will place an unnecessary financial burden on smaller communities, particularly in Northern Ontario.	Comment noted.
Norman Lee, Director Waste Management, Region of Peel	We recommend that any removal of these items from the Blue Box be deferred until the completion of the WDA Review so all change to the contents of the Blue Box can be made at one time.	Comment noted.
Catherine Abel, Vice-President, Food & Consumer Products of Canada (FCPC)	WDO recommendations on material collection consistency are premature in light of the Province's proposal to shift to 100% EPR and an individual producer responsibility approach.	The Minister has requested recommendations on consistent collection of Blue Box materials by February 28, 2010. These recommendations are being developed under the current WDA. .
Catherine Abel, Vice-President, Food & Consumer Products	In its draft report, the WDO report recommends that certain materials, namely paper and plastic laminates not be consistently collected. This could pose a	The Minister has requested recommendations on consistent collection of Blue Box materials by February 28, 2010. These recommendations are being developed under the current

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
of Canada (FCPC)	problem, if under the new 100% EPR model, the province sets material-specific collection and diversion targets that include paper and plastic laminates, and is yet another reason why decisions and investments in consistent collection should be deferred until the new 100% EPR system is underway.	WDA.
Stephanie Jones. Canadian Restaurant and Food Services Association	The Minister of the Environment in Ontario has provided clear direction that the province will be pursuing Extended Producer Responsibility (EPR) which will transfer both the full cost and control of the systems to industry stewards. Ignoring this seems counter-intuitive. Consultations on the core principles of harmonization and identifying and dealing with problematic materials are premature at this time. Both the material categories and the stakeholders themselves may change dramatically under the revised WDA. CRFA will provide preliminary feedback, but recommends additional consultation is completed once the elements of the WDA are announced	The Minister has requested recommendations on consistent collection of Blue Box materials by February 28, 2010. These recommendations are being developed under the current WDA.
Shannon Coombs, President, Canadian Consumer Specialty Products Association (CCSPA)	CCSPA requests that the WDO, on behalf of the Minister of Environment, consider how these Recommendations fit with the concurrent BBPP and WDA Review initiatives and consider not moving forward at this time if these Recommendations are not the priority. As was voiced during the webinar, there is confusion with how the Recommendations in the Reports fit with the concurrent Blue Box Program Plan and <i>Waste Diversion Act</i> Review recommendations, which call for Extended Producer Responsibility (EPR) and greater inclusion of IC&I waste.	The Minister has requested recommendations on consistent collection of Blue Box materials by February 28, 2010. These recommendations are being developed under the current WDA.
Allen Langdon, Vice-President, Canadian Council of Grocery	CCCD and our members believe that the WDO recommendations on material collection consistency are inappropriate in light of the Province's proposed	The Minister has requested recommendations on consistent collection of Blue Box materials by February 28, 2010. These recommendations are being developed under the current

**Table 2**  
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Name & Affiliation	Question	WDO Response
Distributors (CCGD)	transition to a 100% EPR and an individual producer responsibility model. From CCGD's perspective, these decisions would be better addressed as part of the transition to a new system where consistency of material collection is one component of an integrated plan to increase the efficiency and cost effectiveness of the overall system.	WDA.
Greta Najcler, Manager Env. Affairs TDL Group (Tim Hortons)	As a general comment we must state that the current review of the Waste Diversion Act may result in fundamental changes to the current blue box system. Based on this, it would make more sense to complete this review of WDO's consultation papers on 'consistent collection' after the WDA review is complete.	The Minister has requested recommendations on consistent collection of Blue Box materials by February 28, 2010. These recommendations are being developed under the current WDA.
<b>IC&amp;I Sector Materials</b>		
Douglas Konrad, SWS Manager, County of Wellington	SWS staff believe it would be prudent to provide blue box material collection to the industrial, commercial and institutional (IC&I) industry accepting the same consistent materials as the residential sector. However, the collection of materials from non-residential generators must not negatively impact the collection of materials from residential generators.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff support the materials suggested for recycling by IC&I producers as outlined in Table 6.1.	As requested by the Minister, the draft report identifies printed papers and packaging expected to be generated by the IC&I sector. The draft report does not provide a recommendation on this subject.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff support stronger enforcement of Ontario Regulation 103/94 and suggest that IC&I producers be subject to the same standardized requirements for imported products.	Comment noted.
<b>Broader Sustainability Considerations</b>		

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
Douglas Konrad, SWS Manager, County of Wellington	Product manufacturers must be made accountable for their decisions on packaging, not just from a financial perspective, but from a complete environmental life-cycle approach.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	The definition for Extended Producer Responsibility should be as broad as possible to ensure responsible and environmentally sustainable decision-making for the full lifecycle management of consumer products and packaging from conception, design and development through production, usage, recycling, recovery and final disposal.	Comment noted.
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff strongly support the concept that product and packaging designs include better life cycle analysis before allowing them to enter Ontario's marketplace	Comment noted.
Pat Parker, Acting Director Support Services, City of Hamilton	Consideration should be given to the environmental impacts of products and packaging that cannot be easily recycled including the use of virgin materials to manufacture new products and also the landfilling of products that are not made of recyclable materials.	Comment noted.
Greta Najcler, Manager Env. Affairs TDL Group (Tim Hortons)	Fundamentally packaging exists to function, to be protective of human health, and to protect the investment in the product itself. The heavy focus on end-of-life (aka Recycling) takes away from some important front-end considerations that may not be alterable to satisfy the varying needs of the end-of-life marketplace.	The Minister has requested that WDO recommend materials for consistent collection and therefore the focus is on end-of-life management of printed papers and packaging. Stewards are encouraged to consider environmental and sustainability issues when designing their products.
Shannon Coombs, President, Canadian Consumer Specialty Products Association (CCSPA)	CCSPA requests that the WDO, on behalf of the Minister of Environment, consider the <u>environmental impacts</u> of these Recommendations and make necessary revisions to the Reports. The Greater Consistency report focuses narrowly on recycling. There needs to be consideration	The Minister has requested that WDO recommend materials for consistent collection and therefore the focus is on end-of-life management of printed papers and packaging. Stewards are encouraged to consider life cycle, environmental footprint, reduction and reuse when designing their products.

**Table 2**  
**Consistency of Material Collection: Other Questions & Comments**

Name & Affiliation	Question	WDO Response
	of other important environmental factors such as life cycle, environmental footprint and Reduce, Reuse and Recovery efficiencies.	
<b><i>Use of Recycling Symbols</i></b>		
Sean Wedlock, Wedlock Paper Converters	<p>The “Mobius Loop” recycling symbol is widely used and its placement on packaging does not mean that the item is recyclable. This widespread use of the symbol coupled with differences in what is accepted in various Blue Box Programs has led to confusion on the part of householders.</p> <p>In comparison, if a product passes the ASTM compostability test (ASTM 6868), then the Canadian Composting Council Logo can be placed on the item and it can be placed in the green bin (where such programs exist). Given this background, is there an accredited logo or message that can be placed on paper packaging to indicate that it can be placed in the Blue Box and recycled?</p>	The recyclability or compostability of an item is a function of two factors; the physical/chemical/biological composition and properties of the item; and, whether there is a Blue Box or Green Bin collection program in the community that accepts the item. The ASTM Test 6868/ Canadian Composting Council Logo deals only with the properties of the material in terms of degradability during the composting process. Unlike a determination of biological degradability, to be recycled an item must be collected, sorted and shipped to a market capable of recycling it and these systems are constantly evolving. Product labelling is a federal rather than provincial jurisdiction. Because of the complexity and dynamic nature of recycling across the country there is not a corresponding set of material properties that designates recyclability.
Jay Stanford, Director Environmental Programs & Solid Waste, City of London	The use of the Society of Plastics Industry Code (SPI) is confusing to citizens and complicates our communications on the recycling of PET Bottles only.	Product labeling is a federal rather than provincial jurisdiction.
<b><i>Consider Composting &amp; Other End of Life Options</i></b>		
Laura McDowell, Director Env. Promotion & Protection, York Region	York Region staff agree that steward supported research is required for compostable packaging to develop best practices for management of these types of materials outside of the blue box program and avoid resident confusion on what goes where.	Comment noted.
Stephanie Jones.	Under EPR both Energy from Waste and composting	In Ontario, energy from waste is classified as a form of

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<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
Canadian Restaurant and Food Services Association	have been identified as alternative end of life management tools. This must be considered when reviewing both Problematic Materials and be included in the Harmonization Principles.	disposal and as such, is not a diversion option. Diversion programs developed under the WDA may not promote the burning of the material. Composting is a form of diversion if the compost product meets quality standards and can be utilized rather than disposed.
<b><i>Fairness in the Blue Box</i></b>		
Stephanie Jones. Canadian Restaurant and Food Services Association	The WDO's harmonization recommendations favour materials that are already collected in the blue box. Going forward, all materials must be held to the same standard and be provided access to the system they have financially contributed to building. One material category that has cross-subsidized another's blue box success should not now be barred from entry.	Materials were considered for consistent collection using the principles set out in Section 3.1 of the Report. Payment of steward fees does not mean that the steward's product is recyclable or that the product can be collected consistently in the Blue Box system. Some materials on which fees are paid are problematic for the Blue Box system. Stewards' fees are set using the approved fee setting methodology which uses a three factor formula to allocate costs to stewards.
Greta Najcler, Manager Env. Affairs TDL Group (Tim Hortons)	The guiding principle for evaluating greater consistency of recyclable material collection should be a program that endeavours to include all packaging in recycling programs and not one that approaches the blue box from an exclusionary perspective (after all, all materials and packaging pay fees to support the blue box system and should not be treated unfairly due to the realities of handling post-consumer packaging and municipal infrastructure challenges).	Materials were considered for consistent collection using the principles set out in Section 3.1 of the Report. Payment of steward fees does not mean that the steward's product is recyclable or that the product can be collected consistently in the Blue Box system. Some materials on which fees are paid are problematic for the Blue Box system.
<b>Municipal By-Laws and Regulations</b>		
Stephanie Jones. Canadian Restaurant and Food Services Association	The City of Toronto Act, Section 8.2.5 is being used as a basis to ban packaging in one municipality that is being diverted from landfill (recycled or composted) in another - recommend that it be repealed immediately.	WDO does not have the mandate to address decisions within a municipality's authority.
Stephanie Jones. Canadian Restaurant and Food Services Association	Municipal action to impose fees on materials identified as obligated under the blue box program plan (eg. Orillia's plastic bag fee) must be prevented.	WDO does not have the mandate to address decisions within a municipality's authority.
<b><i>Approach to Material Collection</i></b>		

**Table 2**  
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<b>Name &amp; Affiliation</b>	<b>Question</b>	<b>WDO Response</b>
<p>Martin Vogt, EFS-Plastics Inc.</p>	<p>Comments provided in the form of a Power point presentation on “Blue box sorting”. The key comments and suggestions in the presentation for addressing the material contamination and sorting problems were as follows:</p> <p>1) Suggest two stream containers and fibres alternate week collection using bags rather than boxes or carts</p> <p>2) Suggest loose film, not bags within bags, be collected at curbside with container stream and sorted at MRF via use of an air knife</p> <p>3) Suggest glass be kept out of the curbside container stream and collected via depots</p>	<p>1) Recommendations being developed by WDO consider materials collected rather than the method of collection. Decisions regarding the use of single stream or two stream collection are currently the responsibility of individual municipal programs.</p> <p>2) This collection approach and sorting technology is currently not proven in Ontario. This approach could be demonstrated and, if it proved to be effective, could be recommended for the consistent collection of film.</p> <p>3) Technologies are available for processing the mixed broken glass stream.</p>
<p>Jake Westerhof, Canada Fibers Ltd.</p>	<p>Compaction in collection vehicles must not exceed 2:1. If compaction levels on collection vehicles are increased to accommodate greater volume, entangled materials will lead to reduced recovery rates in MRFs.</p>	<p>Comment noted.</p>
<p><b>Other Comments</b></p>		
<p>Laura McDowell, Director Env. Promotion &amp; Protection, York Region</p>	<p>York Region staff agree that product labelling is an effective mechanism to improve consumers understanding and awareness of the impact of their purchasing choices on the environment. Building on this concept York Region staff suggest that product labelling standards be established incorporating a life-cycle analysis perspective and accounting for a sustainable</p>	<p>Product labeling is a federal rather than provincial jurisdiction.</p>

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Name & Affiliation	Question	WDO Response
Laura McDowell, Director Env. Promotion & Protection, York Region	waste management hierarchy in the impact assessment  A higher cost structure for disposal (i.e. added disposal fee) should be established to reduce or eliminate the financial incentive for disposal only if this can be linked to a mechanism to ensure that the higher cost component is paid by the producers of packaging and products consistent with the concept of full-life cycle EPR.	Comment noted.
Shannon Coombs, President, Canadian Consumer Specialty Products Association (CCSPA)	CCSPA requests that the WDO, on behalf of the Minister of Environment, consider the <u>impacts on innovation</u> of these Recommendations and make necessary revisions to the Reports. Both of the Reports are silent on innovation. The Reports intensely focus on “problems” with “recycling”, without recognition that a problem today may be part of an even better solution tomorrow.	The Minister has requested that WDO recommend materials for consistent collection and therefore the focus is on end-of-life management of printed papers and packaging. Stewards are encouraged to consider innovation when designing their products.
Douglas Konrad, SWS Manager, County of Wellington	O. Reg. 101/94 does not require curbside collection, it requires a blue box waste management system only, and IF the municipality collects municipal waste directly from residential sources, THEN blue box waste must also be collected directly at least half the frequency of waste collection. There are many smaller, rural, and northern municipalities who do not collect blue box materials at curbside, and there are likely those whose residents would prefer not to receive curbside collection due to costs, litter, animals, and other issues. The need for curbside collection should be assessed for each municipality to determine the best collection method for residents in the municipality and should not be made mandatory across the province.	Comment re O. Reg. 101/94 noted. The recommendations were intended to be consistent with the requirement under O. Reg. 101/94 for consistent curbside collection where curbside collection is required.
Kelly Clune, Citizen Orillia ON	To increase efficiency and reduce waste Ontario needs to: - focus on ‘diversion from disposal’ (ie. Landfill, EFW, WTE, or similar methods) vs. ‘increased diversion	Comment noted.

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Name & Affiliation	Question	WDO Response
	<p>rates’;</p> <ul style="list-style-type: none"> <li>- develop a target of 85%-95% ‘diversion from disposal’;</li> <li>- include residents <i>and</i> the IC&amp;I sector in responsible waste reduction/diversion;</li> <li>- expand diversion opportunities beyond the Blue Box, to achieve consistent, convenient and cost effective programs;</li> <li>- require 100% Extended Producer Responsibility (EPR) programs that include incentives for consumers to return packaging/products to convenient locations (ie. Deposit&gt;Returns), which will reduce contamination and help to address litter;</li> <li>- establish incentives and/or penalties for producers and consumers to encourage support of the 3Rs hierarchy to increase waste reduction;</li> <li>- identify problem materials and require these materials to be phased out, encouraging new designs or materials to be used that allow for easy reuse, recycling and composting;</li> <li>- establish enforcement policies to ensure Ont. Reg’s 102/94, 103/94, and 104/94 are used to achieve waste reduction goals;</li> <li>- use the KISS approach and support small, manageable collection/sorting centres, where less contamination of materials will occur and where local employment can be created;</li> <li>- support Regional Centers, where needed, to coordinate and track materials;</li> <li>- ensure that private haulers are required to track recyclables and waste;</li> <li>- ensure that materials are diverted to local markets first, and that all facilities used perform sustainable practices; and finally</li> </ul>	

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Name & Affiliation	Question	WDO Response
	- eliminate the option of Waste to Energy or other similar practices to 'manage' Municipal Solid Waste.	
Andrew Pollock, Director Waste Management Services, Niagara Region	Section 3,,2: Considerations in Selecting Specific Materials for Consistent Collection - Material Marketing (pg. 6) - The second bullet reads "utilizing fail labour practices" It should read "utilizing fair labour practices".	The typo will be corrected.