Association of Municipalities of Ontario

AMO's Proposal for a Provincial Integrated Waste Strategy

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This position paper has been prepared by members of the Waste Management Task Force of the Association of Municipalities of Ontario (AMO) and the Association of Municipal Recycling Coordinators (AMRC).

Executive Summary

Ontario is currently in the midst of a waste disposal crisis. Ontario is beset by the combined pressures of a growing population, a lack of landfill capacity, and a lack of other options as a result of current legislative realities. Our citizens need new solutions for waste disposal and they need these solutions quickly. Implementing these solutions will demand both the Province (with constitutional responsibility for the environment) and municipalities (assigned responsibilities for waste) act decisively and intelligently. AMO believes that adopting and implementing an integrated waste strategy is an important and necessary step to a future Ontario that is recognized as a leader in waste management, resource use, and energy creation – all of which will ensure the Province maintains a strong economy and a healthy environment.

AMO believes the Province must immediately implement an integrated waste management strategy that incorporates the following:

- Financial incentives and penalties (including charges, subsidies and deposit-return systems where applicable) to encourage industry to reduce, reuse, recycle, and recover products
- Immediately develop a simplified Class EA System for waste management options that allows for a ranking of new alternative waste management technologies
- Establish waste-related research and development capabilities in the 2006 Budget where both the public and private sector tackle a shared problem
- Support for reduction and reuse initiatives via eco-labelling, procurement, outreach and education programs
- Develop and implement a plan for the Province's 60% waste diversion target, including a critically urgent funding program for the facilities needed to manage organic waste
- Work with all municipalities to establish long term, viable, progressive solutions to the 40% of waste in the stream that requires management
- Reinstate waste management facilities as an eligible service under the *Development Charges Act* so that growing communities can help recover the costs of new facilities required as a result of an increased population base
- Empower Waste Diversion Ontario (WDO) by ensuring that it has sustainable funding, full authority to develop diversion programs and the necessary policy and approval support from the Minister of the Environment
- Amend its current regulatory environment as set out in the guidelines governing energy from waste facilities, the *Environmental Assessment Act*, and the *Waste Diversion Act*
- Utilize residual waste to produce energy.

1.0 Introduction

Ontario is currently in the midst of a waste disposal crisis. While many items could be factors for this crisis – assigning blame will not help us find solutions to this complex matter.

Moreover, while municipalities have been assigned the responsibility for waste management, the Province has the leading role to play in the approvals process as well as in drafting policy statements and legislation to support waste diversion, waste infrastructure, cost recovery, product stewardship, and other related issues.

Ontarians are counting on the provincial government to be a part of the collective, progressive and environmentally sound solutions to the waste management crisis in the province. These solutions must be effective and affordable, and they must also protect the natural environment that all Ontarians treasure. Ultimately, stewardship efforts will also enable Ontario industries to gain a competitive advantage over their rivals due to gains in efficiency and new methods of production that contribute to waste reduction.

The following sets out an integrated framework for policy and legislative tools that AMO believes the Province should implement as soon as possible. The impending closure of local landfills and international destinations to waste shipments from Ontario municipalities provides a great incentive to develop a waste system solution that is neither piecemeal nor temporary, but one that will serve all Ontarians for many years to come. Only a long-term comprehensive policy and program can achieve results that Ontarians need, and that they expect.

2.0 Developing an Integrated Waste Management Strategy

Significant amounts of waste are generated from manufacturing, commerce, construction and demolition processes. The actual waste quantity generated at the end of a product's life is a small fraction of the materials used to process and transport the product throughout its life cycle. Vast tonnes of products find their way into landfills before they reach the end of their usefulness.

Waste management practices have environmental impacts, such as the air emissions from collection vehicles, and the wastewater generated from material processing plants. There are also social and economic impacts. Any consideration given to a waste management option must include these known impacts and possible implications using a life cycle analysis.

Ontario must develop an integrated waste management system that will see the province prosper while reducing harm to the environment and preserving resources for future generations. The system should be underpinned by the following principles:

1. Waste policies and programs must be evaluated according to a *Triple Bottom Line* approach that considers the financial, social, and environmental impact of a given initiative.
2. Sustainable waste management is a responsibility shared by industry, consumers, as well as federal, provincial, and municipal governments.
3. New waste diversion, management, and product regulation programs must follow a waste hierarchy, where integration is a common thread (detailed in the next section).

2.1 Triple Bottom Line Approach

In its broadest sense, the triple bottom line concept captures the spectrum of values that organizations must embrace – economic, environmental and social. In practical terms, triple bottom line means expanding the traditional working framework to use financial outcomes as well as environmental and social performance. The decisions that result will:

- Lead to greater physical, cultural and financial access and equity in service delivery and activities
- Use fewer natural resources
- Promote and maintain economic development and growth in a sustainable manner.

For example, the triple bottom line approach can incorporate standards and guidelines to ensure that the use of offshore recycling facilities follows acceptable social and environmental practices or to assess the other environmental impacts of a given waste management practice beyond waste diversion.

2.2 Sustainable Waste Management

Our current rates of resource consumption and pollution are unsustainable because they exceed the rates at which resources can be regenerated and wastes assimilated by the earth's natural systems. Sustainability requires new ways of thinking to achieve significant changes in production and consumption systems. Sustainability must address social issues such as access and equity along with economic and environmental sustainability—the triple bottom line. Key strategies for sustainability include improvements in eco-efficiency and the closing of material and waste cycles. These approaches must avoid, eliminate, prevent, or significantly reduce the causes of waste.

2.3 An Integrated Waste Management Hierarchy

In many jurisdictions, a waste management hierarchy has been taken as a key element in waste management policy. For example, since the EU's Waste Framework Directive of 1975, member states have all developed similar plans. The hierarchy is widely applied as a guiding principle. The hierarchy implies that waste, depending on its characteristics, should be handled by different methods: prevention by either reducing the content of waste or by reusing the waste is the ideal, followed by conversion into secondary raw materials (some parts can be composted and others used as a source of energy), and the remaining residual waste will likely continue to be landfilled. It is notoriously difficult to compare waste statistics, especially the one most commonly used to measure success: diversion. However, it is generally accepted that jurisdictions with an integrated plan such as those in Europe and the best Canadian example, Nova Scotia, are more successful in diverting waste from landfill, reducing costs to governments, creating new economic opportunities, and preserving the natural environment.

A hierarchy or ladder of waste management priorities such as the following:

1. Prevention (reduction of what enters waste stream)
2. Enhanced Design for Reduction or Reuse
3. Product Reuse
4. Material Recycling and Composting
5. Resource Recovery
6. Disposal via an Energy-from-Waste Facility
7. Disposal via Landfill

2.3.1 Prevention

Waste prevention is the practice of designing, manufacturing, purchasing, or using materials (such as products and packaging) in ways that reduce the amount of trash created. Prevention is the preferred option because it avoids impacts across the entire product life cycle. Industries that create these products need to significantly improve resource use efficiency. Preventing waste can also result in economic savings for communities, businesses, schools, and individual consumers. Waste prevention can be implemented through:

- Voluntary initiatives by producers to maximize their resource use;
- Financial policies that both reward efficient and penalize inefficient activities;
- User fees or some similar cost-recovery mechanism, and/or
- Legislated standards that mandate a certain level of basic efficiency.

2.3.2 Enhanced Design

Source reduction also conserves resources and reduces pollution, including greenhouse gases that contribute to global warming. When businesses manufacture their products with less packaging, they are buying fewer raw materials. A decrease in manufacturing costs can mean a larger profit margin, with savings that can be passed on to the consumer. Consumers will also enjoy additional savings as a result of decreased waste disposal costs.

The Province has a leadership role to play by use of legislation that requires certain levels of resource efficiency as well as the ability to create supportive economic policy. The Province must ensure that these producers pay the real costs of the impact of these products in the municipal waste management system by penalizing them for producing a product that can only be landfilled. This penalty is above and beyond the costs of collection as currently envisioned by the *Waste Diversion Act (WDA)*.

2.3.3 Product Reuse

Reusing items is another way to reduce waste at the source because it delays or avoids that item's entry in the waste collection and disposal system. Reuse can help reduce waste collection, processing and disposal costs, because it avoids the costs of recycling, municipal composting, landfilling, and other processing facilities. Ultimately, less material will need to be recycled or sent to landfills or alternative waste processing facilities. The Province needs to take the lead in encouraging reuse initiatives through appropriate policy and regulatory changes to require a product design and/or deposit-return systems conducive to reuse. For example, Brewers Retail is an excellent example of good stewardship and their refilling model could readily be extended to other products. In addition, the deposit-return concept can also be applied to other products beyond containers, keeping in mind they meet the other criteria in terms of the triple bottom line.

2.3.4 Material Recycling and Composting

Material recovery, or recycling, is a series of activities that includes collecting recyclable materials that would otherwise be considered waste, sorting and processing recyclables into raw materials such as fibres, and using those raw materials in the manufacture of new products or in other processes. Recycling programs, such as those designated under the *Waste Diversion Act* (WDA), should aim to minimize waste through closed cycles that maximize the environmental and economic value of materials, as outlined below.

Collecting and processing secondary materials, manufacturing recycled-content products, and then purchasing recycled products creates a closed cycle that ensures the overall success and value of recycling. The Province can not only promote buying recycled products through its own purchasing programs and guidelines, but it can also legislatively require industry and consumers to do the

same in terms of how much recycled material they are allowed to utilize in their products. As consumers demand more environmentally sound products, manufacturers will continue to meet that demand by producing high-quality recycled products. Many firms have found that similar requirements in European jurisdictions have enabled them to save money and gain a competitive advantage by producing a better end product. Currently, a lack of local markets results in some products being exported to various parts of the developing world – which may not have the necessary environmental and labour safeguards in place. Industry must develop local markets to responsibly deal with their products and/or work with the Province to develop standards to ensure the countries that currently accept recyclables from Ontario, process them in a socially and environmentally responsible manner.

Similarly, the Province can support the use and marketing of compost via regulatory improvements and procurement policies. This can include traditional compost facilities as well as biodigesters. Biodigesters can productively process manure, biosolids, septage, and household organic waste. The end products include methane gas that can be converted into electricity, liquid ethanol, and compost. Biodigesters and other combined heat and power units that use anaerobic digestion technology can make a positive contribution to a national renewable energy strategy by providing distributed, electricity baseload capacity (7/24 operation) or peak demand supply, while remediating key environmental problems including odours and greenhouse gases. The Province now has the benefit of being able to examine a working model developed by Agriculture Canada in Lucan, Ontario.

2.3.5 Resource Recovery

Another vehicle to address the energy crisis is the utilization of materials that can currently provide no higher purpose other than landfill. Energy-from-waste (EFW) facilities (pyrolysis and gasification may also provide a future role) not only have the advantage of producing energy from waste but they also have environmental advantages over more traditional waste management methods such as landfilling. A major environmental advantage is that it avoids methane production – the most dangerous greenhouse gas. Another major advantage is that it produces "green" energy, which can also generate credits for sale under the Kyoto Protocol's emission credit trading program. AMO believes that EFW facilities are a valid option for the 40% of waste that cannot be reduced, reused, or recycled.

Selection of recovery options should consider environmental impacts that may include greenhouse gas generation, water consumption and waterborne wastes. Social and economic impacts also need to be considered. Overall, the alternative conversion technology should consider the net effects relative not only to the alternative technologies, but also to avoided use of energy generated through other technologies. In other words, considered technologies should be credited

with avoiding the need for new energy generation facilities and the environmental impacts of those facilities. These technologies can be a productive part of Ontario's new energy mix by moving away from harmful production processes. Energy recovery facilities should be as efficient as possible and the recovery of energy should create a net conservation of resources and a reduction of pollutants, without producing a net increase in health risks.

The Province must amend its regulatory and approvals process to support the production of alternative fuels from mixed waste. For example, biofuels created from dried paper and food waste, and process engineered fuel created from dried plastic and paper waste, can both help prevent waste from going to landfill, while producing useful electricity and improving the bottom lines of firms that produce it. The MOE should classify such alternative fuels as products and allow them to replace fossil fuels in industrial applications, provided they can meet defined emissions criteria.

In addition to bio-based technologies, facilities that currently use coal to fire their industrial processes, such as cement kilns and coal-fired electricity plants, may also be retrofitted to process materials such as orphan (non-recyclable) tires and other solid waste that cannot by reused or recycled due to contamination or technological limitations.

Ontario is also being faced with an energy crisis. With growth and increased pressures to manage our solid waste also comes the need for additional energy. There is a commonality here that needs further consideration and action. The waste of today, and that produced in the future, can be put to a higher and more valuable use – it can produce energy. While many of these facilities are small they are financially viable (even irrespective of existing economic externalities) and must be promoted for their contribution to energy generation, waste management, economic development, and environmental stewardship.

While energy recovery should only be used for materials that have no higher end use than to be converted to energy, there is a role for these facilities in a viable integrated waste management strategy. Indeed, these facilities are not the inefficient plants of yesteryear, but are cleaner than most current industrial processes. The dioxin contribution from most facilities is now less than 2 grams/year. Industrial production methods such as those used by iron, steel, non-ferrous metals production and power generation dwarf this contribution. Moreover, while electricity-only generation has much to commend it, converting waste to energy offers the benefit of resource conservation by virtue of its enhanced overall efficiency and reduced greenhouse gas emissions.

It is evident in the European experience that the use of energy from waste facilities has not inhibited either recycling or composting programs. Similar expectations can be relied upon here as we would support the same type of approach in Ontario. Ontario can learn from this by adopting similar policies and

reducing reliance on less sustainable landfill alternatives and/or exporting waste with its associated harmful environmental impacts. The stakeholders in the waste industry need to have an open and progressive dialogue on these issues to move forward. The Province must amend the *Waste Diversion Act* (WDA) and current regulations that forbid the development of energy-from-waste facilities.

2.3.6 Disposal Via Landfill

While landfills are generally recognized as the least desirable method of dealing with solid waste, they are also expected to continue to be a part of many waste management systems in the foreseeable future. The Province must amend the current approval process to enable willing municipalities to site and construct landfills.

3.0 Getting Buy-in from the Public and Stakeholders

For this new framework to operate successfully, all the major stakeholders with an interest in waste must focus their attention across all levels and not just on those that appear easy or commercially relevant over the short term. To make certain that this strategy receives widespread and deep support among all stakeholders across the Province, it should abide by the following general tenets when making recommendations regarding facility type and siting:

1. **Conservation:** All mechanisms should strive to maximize resource use and minimize impact on the natural world. This will impact the program options mentioned above, potential sites for new facilities, as well as how these programs and facilities function. The on-site integration of functions, such as processing industrial waste from a neighbouring facility or heat/energy production from waste, should be enhanced wherever possible.

2. **Equity:** The implemented framework must ensure equal access to resources as well as an equitable sharing of responsibility for waste management across sectors. Thus, while we believe the manufacturers or end retailers should ultimately be responsible for their product, we understand that there is a role for the municipal and private waste management sectors as well as individual consumers in the overall process.

3. **Choice:** It is important to find willing host communities for new waste management facilities. At a local level, citizens must have an opportunity to be meaningfully involved in the planning process from start to finish.

4. **Collaboration:** Waste management is a shared responsibility. Thus, workable solutions will require both orders of government and all stakeholders involved in waste generation and management to be partners in developing new programs.

The residents of Ontario need to be informed about the evolving approaches to resource conservation and producer/consumer responsibility in waste management. The Province will need to take the lead in dispelling widely-held myths by educating Ontarians, and can also help dispel misgivings by involving citizens in the preparation of new policies and programs.

4.0 Implementation

A large set of policy instruments should be available to promote the waste management hierarchy. These should include economic, legislative, social and institutional instruments.

4.1 Economic Instruments

Economic instruments have the shared characteristic of providing incentives to economic agents to act in a more environmentally sound manner. Economic instruments alter the value of some elements of the waste process, allowing decisions to be made that reflect the full social cost of the particular activity. This approach can be described as internalizing the external costs and benefits associated with the waste process. Such instruments can include the following:

1. **Charges and fees** that make polluting and waste generating behaviour more expensive. Charges can be levied at various stages of the waste process and include: product charges, collection charges, disposal charges and emissions charges. For example, many European jurisdictions have imposed fees on waste, which is differentiated so that it is most expensive to landfill waste, cheaper to recover energy from it and tax exempt to recycle it. They also have "green" charges on products they wish to discourage such as plastic bags, disposable tableware and nickel-cadmium batteries. The Province has the opportunity to develop a similar "feebate" system here in Ontario that creates an industry-funded mechanism that rewards efficiency and penalizes inefficiency. The Province also has an opportunity to revisit the plan promoted by the Ontario Tire Stewardship (OTS) as approved by the WDO in order to implement an environmental user fee to support the proper disposal of waste (non-recyclable) tires. The Province can also encourage more municipalities to implement user-fee programs as incentives for households to reduce their production of non-recyclable waste.

2. **Subsidies and other types of financial support** such as tax reductions that make environmental-friendly behaviour cheaper. For example, many jurisdictions reward waste prevention and recycling. In Europe, there are many subsidy programs for technological improvements in waste processing facilities and for the development of waste management infrastructure in general. The Province should assess industry standards for

packaging to reduce waste at its source as a first step. It can then examine other industry standards and make the necessary adjustments in financial legislation.

3. **Deposit-refund systems**, in which a deposit for a potential waste product is paid by the purchaser, who can claim a refund for the return of the product. In this way the product retains a value, even if it has become useless to the economic agent that bought it, thereby preventing uncontrolled dumping. While Brewers Retail has operated a tremendously successful deposit-return scheme since 1927, no other industries have stepped forward to fulfill the requirements of extended producer responsibility (EPR) by implementing a similar system. The Province has an opportunity through the beverage industry, including the Liquor Control Board of Ontario (LCBO), to introduce a deposit-return system utilizing the environment fee that is already imposed on the sale of each container. Moreover, deposit-return should be extended to other consumer products such as electronics and automobiles as previously mentioned.

Such economic instruments are flexible mechanisms that create awareness and can yield substantial cost savings by allowing polluters to determine the most appropriate ways of meeting a given standard, they offer an ongoing incentive to reduce pollution below the levels determined by regulations, and they are justifiable under the polluter-pays principle.

In summary, the Province should create a timeline for industry to adopt changes necessary to reduce, reuse, and recycle waste by utilizing economic instruments. This could occur by utilizing the following:

- A short period of provincially-funded financial incentives for industry to reuse and recycle products and/or a relevant regulatory requirement followed by a disincentive policy of financial penalties for industry that creates products that are not reusable or recyclable
- A similar continuum of incentives followed by disincentives for industry to reduce the amount of non-recyclable material in their products and/or packaging
- A stimulus package for local industry to develop innovative production methods and disposal options for their products and packaging
- A package of similar incentives and disincentives for consumers/citizens.

4.2 Regulatory Instruments

Regulatory instruments, whether emission or design standards, provide a significant degree of predictability for all stakeholders. AMO asks the Province to amend its current regulatory environment as set out in the guidelines governing

energy from waste facilities, the *Environmental Assessment Act*, and the *Waste Diversion Act*. The Province will also need to develop regulatory requirements to promote reduction, reuse, and recycling. An inter-ministerial approach will be necessary to create a manageably streamlined approvals and regulatory process for new technologies such as biodigestion, which may produce a wide range of end products including energy, ethanol, compost, and wastewater.

For example, the Province should approve of and implement environmental fees dedicated to encouraging diversion, such as that in the WDO-approved Scrap Tire Diversion Program Plan. Similarly, Section 25(2) of the *Waste Diversion Act* must be amended to enable materials to be converted into energy, such as (non-recyclable) tires being used to fuel coal-fired cement plants as in many jurisdictions in the United States. Such a change would require amendments to supportive documents such as Guidelines A-6 and A-7 on energy from waste facilities as well as to Certificates of Approval for coal plants and other interested industries. Other regulatory changes that serve the greater public interest include those enabling industries to use closed-loop production processes that power part or all of production by converting their waste products into energy and/or heat. Even if we can meet the 60% Diversion goal, there will continue to be 40% of waste in the stream that will need management. The Province has the benefit of being able to utilize numerous working models of such regulations, such as the EU Waste Incineration Directive standards, to ensure any new waste management mechanisms are low risk, environmentally benign, and cost-effective.

4.3 Improving Environmental Assessment

AMO has commented extensively to the government's Environmental Assessment Advisory Panel's Report. In addition, the Province has a very useful report from the Waste Sub-Panel as part of the EA review process initiated in the spring of this year.

Unfortunately, the current regulatory environment, as set out in the legislation, regulations and guidelines, which governs the assessment and issuance of approvals for waste management undertakings, is excessively long, confusing, and in some instances discriminatorily expensive. For example, it took the Region of Halton 10 years and over $8 million dollars, and Ottawa Valley unsuccessfully invested $3.3 million over 15 years, to manoeuvre through the labyrinth of the environmental assessment process. The time and expense of this process on the property tax dollar can no longer be justified or sustained, and must be significantly modified without delay. The combination of this onerous legislative-regulatory process and cost with the serious limitations in the availability of disposal facilities in Ontario is potentially disastrous. The EA process must be streamlined to become timelier and less financially onerous.

4.4 Sustaining the WDO

Another area where the Province can provide leadership is through Waste Diversion Ontario (WDO). The Minister of the Environment is empowered under the *Waste Diversion Act* to designate materials for diversion, requests additional work to be done by the WDO, order new activities and request revisions to WDO approved documents, determine the composition of the WDO Board and the IFO Board of Directors, approve the fee structure for stewards, and has the power to make any regulation.

WDO has coordinated the preparation of two diversion plans: the Blue Box Program Plan (BBPP) and the Used Tire Plan. It is in the process of co-ordinating the Waste Electronic and Electrical Equipment (WEEE) Plan and is trying to resolve the stalemate around the Used Oil Plan. The WDO was envisioned as an independent and self-reliant body that derived its administrative funds from industry organizations with approved waste diversion plans. Unfortunately, to date, only the BBPP has been approved and the industry funding organization for the BBPP, Stewardship Ontario, is solely paying those fees.

Municipalities have been very committed to the development of new diversion plans but have been hamstrung by the lack of assuredness in the WDO development process. We are concerned how this might impact the development of the electronic waste plan and other impending plans for materials that need to be diverted to meet the Province's admirable 60% diversion goal.

Permitting the WDO to fail will have grave consequences for the Province and municipalities. As the pressure mounts to find solutions for waste disposal, the need for diversion of materials becomes critical. The current designation of Blue Box waste actually creates a disincentive for companies to increase the recyclability of their packaging and unfairly targets companies with a high percentage of recyclable packaging. This can be addressed by designating non-recyclable packaging as well and requiring these industries to pay for the cost of municipal waste collection and disposal.

4.5 60% Diversion

AMO supports the Province's plan to see 60% of waste diverted. However, we are doubtful that this can be achieved by the targeted timeline of 2008 due to the lack of existing infrastructure or an implementation plan. The Province must develop and implement a plan for the 60% waste diversion target, including a funding program for the facilities needed to manage organic waste.

4.6 Remaining Materials yet to be Diverted

By establishing a province-wide framework, the Province will set the bar in terms of what is expected – including targets such as the 60% waste diversion and newly designated waste materials. Yet, a number of substantive issues must be resolved to achieve this mandate, not least of which is the availability of funding to meet infrastructure needs for certain diversion materials. The other aspect to achieving this goal is the designation and plan development under the *WDA* for materials in the waste stream such as household hazardous waste and organics. It is also unquestionably important to complete and approve the plans for those already designated materials including electronics and tires. Thus, the Province needs to form aggressive diversion plans that include timelines and measurable goals for materials such as organics, household hazardous waste, non-recyclable packaging, disposable products (e.g. diapers), fast food and convenience food packaging.

4.7 Communication & Education

In terms of communicative instruments, Ontario municipalities have been leaders in developing and providing education and information initiatives but have not been adequately supported by other mechanisms such as eco-labelling. Eco-labelling is a visible and affordable way of the government communicating to consumers which firms are producing products that seek to maximize resource use and minimize waste. The Province needs to develop an eco-labelling program such as those that have been successfully developed in Europe for packaging and other products. The Province also has the ability to support municipal waste reduction, reuse, and recycling campaigns.

4.8 Research & Innovative Approaches

Without research and demonstration projects supported by the government, the potentially large number of alternative uses for recycled materials is unlikely to become economical in the foreseeable future. The Province should re-establish the capacity that used to exist within the Ministry of the Environment for conducting research – such as that needed on the Life Cycle and Cost Benefit Analyses of various products targeted for designation under the *WDA* or slated for a product redesign. The 2006 Budget should contain provisions to reinstall this capacity in a timely manner to cope with the problems we are facing today. Certain municipalities could also benefit from provincial analyses of new alternative waste management technologies under an improved MOE research and development capacity. Finally, the Province has an opportunity to increase the market for reused and recycled goods by ensuring that their procurement procedures are geared to maximize the use of such goods and that the taxation system also rewards firms that do the same.

4.9 The Financial Dilemma

The Province should step forward with a funding strategy for the new waste management facilities that are required in most areas of Ontario. As a minimum, the Province should reinstate waste management facilities as an eligible service under the *Development Charges Act* so that growing communities can recover the costs of new facilities required as a result of an increased population base. This of course does not help rural and remote communities, which will require some financial assistance to meet their waste management needs.

5.0 Conclusion

Despite progress in diverting waste from landfill sites through reducing, recycling and composting, Ontario is beset by the combined pressures of a growing population, a lack of landfill capacity, and a lack of other options as a result of current legislative and political realities. We need new solutions for waste disposal and we need them quickly. Implementing these solutions will demand that both municipalities and the Province act boldly and bravely. AMO believes that adopting and implementing the hierarchy and the supportive policies set out in this paper is a necessary first step to making Ontario a recognized leader in integrated waste management, resource use, and energy creation – and will ensure it maintains a strong economy and a pristine environment.