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September 4, 2013

Wendy Ren
Assistant Director
Waste Management Policy Branch
Ministry of the Environment
135 St. Clair Avenue West, Floor 7
Toronto, ON M4V 1P5

Dear Ms. Ren:

**Re: Proposed *Waste Reduction Act, 2013* (EBR Registry No. 011-9260)
Proposed Waste Reduction Strategy (EBR Registry No. 011-9262)**

The following submission outlines the concerns of the undersigned public interest organizations regarding the proposed Bill 91 (*Waste Reduction Act, 2013*) and the proposed Waste Reduction Strategy, which were released for a 90-day public comment period on the EBR Registry on June 6, 2013. Additional specific details regarding our concerns with Bill 91 are expected to be prepared in anticipation of legislative committee hearings on Bill 91.

For many years, public interest groups and stakeholders have provided input and recommendations towards improving and strengthening Ontario's approach to waste reduction. The following comments provide another opportunity to emphasize and expand on issues raised by the public interest communities in the past.

In general, we welcome the introduction of Bill 91 and the Waste Reduction Strategy. After many years of delay in making necessary legislative changes to waste reduction laws, Bill 91 provides an important opportunity for Ontarians to finally have laws that move us significantly towards a zero waste goal in Ontario. However, as currently proposed, Bill 91 is inadequate in several key provisions to achieve zero waste.

This submission aims to highlight important principles, objectives and reforms which are necessary to strengthen Ontario's waste reduction framework. In particular, we focus on key

provisions in Bill 91 that require amendments in order to provide environmental and health benefits as well as economic benefits to Ontario.

General Principles

Previous submissions by non-governmental organizations have emphasized the importance of several overarching general principles that should form the foundation of the waste reduction framework.¹ We highlight several of these principles below.

a) Protection of the environment and human health must be the primary goal of Bill 91.
The focus of the Bill 91 and Waste Reduction Strategy should be to reduce existing impact and prevent future impacts on human health and the environment using the precautionary principle.

b) A goal of zero waste should be explicit in the Waste Reduction Act.
Currently, Bill 91 does not include an explicit goal of zero waste. We maintain that zero waste should be a foundational principle explicitly stated in Bill 91 as well as in the Waste Reduction Strategy.

c) A clear hierarchy of waste reduction is essential.
The proposed Act (as well as in regulations), should include a hierarchy of waste reduction initiatives including a hierarchy within the three 'R's to favour waste reduction over reuse, and reuse over recycling. Currently, Bill 91 does not distinguish between the 3R's nor give priority to waste reduction initiatives.

Additionally, higher orders of recycling that promote the highest and best use of a material must be prioritized. For example, recycling into the equivalent or higher value product that directly replaces the use of a virgin materials (e.g. a glass bottle recycled into a glass bottle) should be favoured over 'down-cycling' of materials (e.g. a glass bottle being crushed to use as road bed).

Ultimately, if a material can't be reused or recycled, and if it can't be processed in an environmentally safe way that eliminates toxic releases, it should not be sold in Ontario.

d) Polluter Pays - Waste from all sectors, geographical regions and in all forms should be regulated.

Product waste should be the responsibility of the Producer regardless of where it ends up, who the customer is, and where they are located – whether it is a member of the public in a remote municipality or a business in the Industrial Commercial and Institutional (ICI) sector in the GTA. In order to incent Producers to redesign products to reduce waste, Producers must take

¹ See: Letter to Alena Grunwald, Ministry of Environment on Minister's report 'From Waste to Worth' regarding the Waste Diversion Act Review, dated February 1, 2010 and Letter to Hon. John Gerretsen, Minister of the Environment regarding the Waste Diversion Act dated July 29, 2010.

responsibility for all product waste sold to all markets across the province, including waste that is ultimately disposed.

These general principles should be explicitly reflected in both Bill 91 and the Strategy.

PART A – Specific Comments on Bill 91

Part 1 – (Section 1) Definitions

The proposed Bill lacks clear definitions of waste reduction, reuse, recycling and disposal. Clear definitions provide the opportunity to ensure that the primary goals and principles of this Bill (and the Strategy) are entrenched in all future regulations and standards arising from them. Clear and specific definitions of waste reduction terms should be included to provide better clarity and certainty now and in the regulation-setting process.

Part 2 – Waste Reduction Authority - Accountability, Transparency and Public Oversight

Bill 91 needs to provide for strong accountability structures to ensure that the Waste Reduction Authority is accountable to the Legislature and ultimately to the public for the conduct of its operations. An important means of ensuring accountability is by public transparency and public oversight. In this regard, we note that the section 25 of the Bill stipulates that the Auditor General may audit the Authority. We support the inclusion of this provision as it ensures that the financial operations of the Waste Reduction Authority will be subject to scrutiny and oversight by the Auditor General.

However, the Bill does not include other important accountability structures which currently apply to government ministries such as the *Freedom of Information and Protection of Privacy Act (FIPPA)*, the *Environmental Bill of Rights, 1993 (EBR)* and the *Ombudsman Act*.

FIPPA provides for a general right of the public to access, upon request, records which are under the control of an institution which is defined or designated under the Act. In the event access is denied, the decision may be appealed to the Information and Privacy Commissioner, who can order release of the record. *FIPPA*, thus provides an important means of ensuring public transparency of government ministries and provincial agencies.

The *EBR* which was enacted in 1993 has also played a significant role in ensuring government accountability by providing the public with the opportunity to provide input into the government's decision-making process on environmental matters. Under the *EBR*, the public has to be given notice and provided the opportunity to comment on legislation, regulations, policies and other instruments. In addition, the public also has the right to request an investigation for alleged violations of prescribed laws and request a review of laws and policies.

The *Ombudsman Act* is also another essential legislation for ensuring accountability by provincial government organizations. The Ombudsman's mandate is to investigate complaints made by Ontarians against provincial governmental organizations. In the event the Ombudsman

finds a problem with a government action or decision, he or she can make recommendations to the government to address the problem. In the event, the recommendations are not implemented the Ombudsman can report the case to the Legislature.

Bill 91's failure to subject the Waste Reduction Authority to *FIPPA*, the *EBR* and the *Ombudsman Act* will result in the loss of important accountability structures which apply to organizations operating in the public sphere. We therefore recommend that *FIPPA*, the *EBR* and the *Ombudsman Act* apply to the Waste Reduction Authority.

Part 3 – Responsibilities of Producers

As noted in previous submissions by environmental NGOs, a framework of individual producer responsibility is essential for an effective waste reduction and zero waste goal for Ontario. These groups strongly support an individual producer – or a 'Polluter Pays' -- regime that promotes redesign of products and packaging to minimize waste.

As producers and importers are uniquely in the position to determine product design, packaging and distribution, they are able to reduce waste and eliminate toxicity in the products and materials they sell in Ontario.

Part 3 (Section 39) - Producers should be held responsible for all product waste.

A fundamental element to individual producer responsibility is that producers must be held responsible for all products and packaging they sell into the market and profit from, no matter where it is sold, who the consumer is, or whether it is disposed.

- Producers must collect their product and packaging waste from all consumers across the Province, no matter where they live. This means they cannot be permitted to fulfill their producer obligations by focusing on only one region while ignoring another. Producers who benefit from remote markets and difficult to reach municipalities must take responsibility for the waste created in those regions. If producers can find a way to sell their products to a region, they need to be responsible for the waste generated in that region. The Waste Reduction Strategy and Bill 91 regulations need to guard against standards that permit producers to manage waste in only some regions of the Province. A goal of zero waste will advance this approach and ensure that Producers address issues facing remote markets and municipalities on waste management.
- Producers should be responsible for all designated products sold into Ontario markets regardless of the purchaser. Limiting liability to the residential sector continues to ignore a large and important segment of the market and a major environmental opportunity. Producers should be required to meet waste reduction targets whether their product is sold to individual consumers, the public sector, or the ICI sector. This also requires that reduction, reuse and recycling targets need to be sufficiently high so that Producers don't 'cherry-pick' and selectively reduce waste in some areas and with some customers, while ignoring others.

- Finally, Producers must be responsible for the reduction, reuse and recycling of products, as well as for the disposal costs of wastes that are sent for disposal. This can take the form of establishing high reduction standards and reduction, reuse and recycling targets (in the range of 95 to 100%, with an ultimate goal of 100% over time), or a tiered fee or penalty for waste that isn't recovered. By ensuring that there is a clear and direct liability for disposal, the Act can further incent producers to reduce waste.

Part 3 (Section 40) - Only Producers should be liable for meeting their obligations.

The undersigned public interest groups object to the entrenchment of Intermediaries in Bill 91. The Producer must be ultimately and solely responsible for meeting environmental regulations and standards. The responsibility and obligation of the Producers cannot be shared with or transferred to an agent or intermediary contracted to provide services to a Producer. By entrenching the concept of intermediaries in Bill 91, the *Waste Reduction Act* simply serves to further complicate concepts of responsibility, accountability, liability and add another party to be regulated by a Waste Reduction Authority. Producers ought to be free to choose to meet their obligations in any manner, without any impact on their liability and responsibilities.

Part 3 (Section 41(3)) Municipalities play a valuable role in waste reduction

Municipalities play an essential role in waste reduction, waste collection and public education that needs to be considered while balancing the need to ensure that environmental goals are met.

Across Ontario, municipal governments are the 'face' of waste management for the general public, having built up years of experience and reputation. The *Waste Reduction Act* and Strategy must recognize the value that municipalities provide in terms of public access to waste services and knowledge of public waste management. Bill 91 needs to protect municipalities and ensure a new Producer Responsibility regime won't leave small or remote municipalities without adequate and effective waste management services. At the same time, this is an opportunity to improve waste reduction by raising waste diversion services and targets for all municipalities.

The public experience of waste reduction efforts (including access to waste management services as well as information about those services) indicates that such efforts must be made simple and effective. Regulations made under the *Waste Reduction Act* and implementation of the Waste Reduction Strategy must guard against the creation of a fragmented and confusing waste management system.

Consistency in what is recycled in the blue box program, on how Municipal Hazardous and Special Waste (MHSW) and other forms of waste are handled is important for an effective program. Where possible, the *Waste Reduction Act* should work towards consistency among municipalities and also with the ICI sector in terms of designated waste, waste diversion rates, and waste reduction, reuse and recycling systems.

Part 4 – Integrated Pricing

The undersigned organizations agree with the concept of integrated pricing as it will eliminate consumer confusion and ensure that the environmental costs of products in Ontario are not simply passed on to municipalities and taxpayers. .

Part 5 – Inspections and Enforcement

In previous submissions, we have expressed concerns to the Ministry of Environment (MOE) about the need for effective oversight and enforcement to ensure that industry complies with the regulatory requirements for waste diversion.²

Bill 91 provides the Waste Reduction Authority with inspection and enforcement powers, including the power to issue administrative penalties and conduct prosecutions for violations of the Act and regulations.

We strongly support the use of inspections and enforcement powers to ensure regulatory compliance with the *Waste Reduction Act* and regulations. However, we are very concerned about the transfer of enforcement powers from the Ministry of Environment to the proposed Waste Reduction Authority as the means of achieving this objective.

The transfer of enforcement functions to the Authority raises serious concerns about the impact that such a move would have on independence and fairness in the conduct of prosecutions under the *Waste Reduction Act* and regulations.³ Currently, prosecutors with the Ministry of Environment's Legal Services Branch, who undertake prosecution of Ontario's environmental laws, are accountable to the Attorney General as opposed to the Minister of Environment. This arrangement was intended to ensure that there was no political interference with regard to the conduct of prosecution by the Crown. The Attorney General, in turn, is accountable to the Legislature for the administration of justice in the province. As a result of this accountability, a continuum of responsibility exists in government ministries undertaking prosecutions, from individual Crown counsel who handle specific cases up to the Attorney General.⁴ The transfer of enforcement functions would result in the loss of this important accountability structure that presently exists in the administration of justice in Ontario. Furthermore, the policies of the Ministry of Attorney General regarding the initiation of charges, the conduct of prosecution and other procedural requirements such as disclosure requirements by the Crown will not apply to

² Letter to Alena Grunwald, Ministry of Environment on Minister's report 'From Waste to Worth' regarding the Waste Diversion Act Review, dated February 1, 2010.

³ These concerns were raised previously by the Canadian Institute of Environmental Law and Policy in a report titled "The New Public Management Comes to Ontario." The report examined these transfer of enforcement functions from the Ministry of Consumer and Commercial Relations to the Technical Standards and Safety Authority. However, many of the concerns raised in that study are also relevant to the Waste Reduction Authority.

⁴ Ontario Ministry of the Attorney General, Crown Policy Manual available at <http://www.attorneygeneral.jus.gov.on.ca/english/crim/cpm/2005/CPMPreamble.pdf> at p. 2

the Authority.⁵ The delegation of enforcement powers to the Waste Reduction Authority also raises important concerns about whether the protections afforded to accused persons under the *Canadian Charter of Rights and Freedoms* will apply to prosecutions undertaken by the Waste Reduction Authority.

We note that since the transfer of inspections and enforcement functions from the Ministry of Government Services, (formerly known as the Ministry of Consumer and Commercial Relations) to the Technical Standards and Safety Authority (TSSA) in June 1996, concerns have been raised about TSSA's effectiveness as a regulator. A report done by the Auditor General of Ontario found that the Ministry's monitoring of inspections, investigations and other enforcement activities undertaken by delegated authorities in response to violations was inadequate.⁶ The report noted that of the 4,600 natural gas pipeline incidents reported in 2001, only about 170 or 4% were investigated by the TSSA and no assessment had been done to determine whether this level of investigation was sufficient and appropriate to protect public safety.⁷ The Auditor General concluded that with respect to the Ministry's oversight of delegated authorities, the Ministry did not have adequate assurance that public safety and consumers were properly protected by the industry oversight organizations.⁸ Similarly, a study done by Elaine Todres and Associates which assessed the effectiveness of the use of delegated administrative authorities found that businesses were not addressing the problems that were identified through TSSA's inspections. The report noted that a key aspect of the TSSA inspection and enforcement model is that businesses are billed for fees after an inspection. However, some business owners felt it was cheaper to have re-inspections occur than fix the problem.⁹ This has given rise to concerns that the TSSA is more focused on cost-recovery than in ensuring public safety and is reluctant to move swiftly to mandatory enforcement in case of repeated non-compliance.

A 1998 Coroner's Inquest which was held in relation to the death of an individual by a reverse bungee ride resulted in 29 jury recommendations being directed mainly at the TSSA. The jury recommended that the province and not the TSSA take responsibility for investigating accidents. More recently, the explosion at the Sunrise Propane facility in North York has also raised concerns about the effectiveness of the TSSA's inspection and enforcement procedures.

In our view, the enforcement of law is a core government function and should not be transferred to a delegated administrative authority such as the Waste Reduction Authority. We therefore strongly recommend that the inspection and enforcement powers in relation to the *Waste Reduction Act* and regulations remain with the Ministry of Environment.

⁵ See Crown Policy Manual.

⁶ Office of the Auditor of Ontario, Annual Report 2003, at p. 97.

⁷ *Ibid.*

⁸ *Ibid.* at p. 96.

⁹ Elaine Todres and Associates, *Delegated Administrative Review Model*, (May 2009) at p. 75.

Part 6 – Regulations

Currently, Bill 91 does not provide sufficient information to demonstrate that the environment will be protected, and that waste will be reduced. Bill 91 acts as enabling legislation that will seek new regulations to establish environmental and health standards related to waste. Minimum environmental standards should be a fundamental component of Bill 91 and the Waste Reduction Strategy to provide clarity and certainty for the future regulation-setting process.

Regulations and standards must be set very high, and must consider a range of environmental and health impacts of waste management. Regulations and standards must undergo regular review to ensure that the expected outcomes are being met and to identify gaps and improvements.

The Waste Reduction Hierarchy – The 3Rs Hierarchy

To achieve a zero waste goal and minimize environmental impacts, a hierarchy of waste reduction, including a hierarchy within the three “R”s must be recognized that prioritizes conservation of materials and lower-impact practices. Materials and products should be reused or recycled to the best and highest practicable use - to minimize material and resource waste, toxic releases, and to reduce environmental impacts.

The *Waste Reduction Act*, future regulations and the Strategy should include recognition of a hierarchy of waste reduction initiatives to favour practices that promote the highest and best use of a material. For example, reuse (such as deposit-return programs) should be favoured over recycling. Additionally, higher orders of recycling such as recycling into the equivalent or higher value product that directly replaces the use of a virgin materials (e.g. a glass bottle recycled into a glass bottle) should be favoured over ‘down-cycling’ of materials (e.g. a glass bottle being crushed to use as road bed).

Ultimately, if a material can’t be reused or recycled, and if it can’t be processed in an environmentally safe way that eliminates toxic releases, it should not be sold in Ontario.

Part 7 – Existing Waste Diversion Programs

The timeline for transition from existing programs under the *Waste Diversion Act* to the new *Waste Reduction Act* is far too slow. Considering the significant consultation and analysis of the current system, there is no need for the transition to be delayed - this may lead to many unnecessary further delays and complications

Additional Comments on Bill 91

Processors should also be regulated by the Waste Reduction Authority.

In order to meet high environmental standards and to achieve the goal of waste reduction and environmental protection, there needs to be regulation and standards imposed on recyclers and waste processors.

Without regulation or licensing of the recycling industry, there is no assurance that materials are recycled safely, with consistency across service providers, or with a priority for higher order recycling. Consumers and the public expect and want to be assured that recycling standards are consistent and that environmental goals are being met.

It cannot be left to the recycling processors themselves --or the producers-- to both meet recycling obligations and certify and inspect recycling facilities - it's 'leaving the fox to guard the henhouse' again.

Regulations need to be set by the Government of Ontario to outline operation standards, and provide definitions of recycling. These standards also need to define higher order and lower order recycling, as explained above.

Processors could be managed through a certification or licensing system that is available to both in-Ontario and outside-Ontario recyclers. Waste that is sent to a non-registered processor should not be counted towards Producer obligations.

Environmental Standards

As enabling legislation, Bill 91 will create a number of regulations to implement the *Waste Reduction Act*, including establishing environmental standards. The undersigned public interest groups note the importance of establishing environmental standards that support a goal of zero waste for Ontario. Bill 91 would be strengthened significantly if it includes such a goal. Such goals would substantially give priority to the importance of environmental and health protection as it relates to waste management. It would also provide guidance during the regulatory development phase for establishing environmental standards for waste reduction.

Other Legislation

The *Waste Reduction Act* should examine the impact of, and relationship to, other relevant Federal and Provincial legislation. In particular, the *Competition Act* is essential for the effective implementation of this Act, to ensure that individual producers meet their obligations in a way that is fair. The Provincial *Toxics Reduction Act* must also be considered in how producer and processor responsibilities to reduce the release of toxics in manufacturing, processing, recycling and disposal can enhance the environmental and health outcomes of the *Waste Reduction Act*.

Part B – Comments on Waste Reduction Strategy

Expand programs to designate additional wastes.

Under the current EPR system in Ontario, a number of important wastes are not the responsibility of the Producers. The goal of the Act and Strategy should be to cover all possible products and waste materials as quickly as possible towards the goal of zero waste.

In particular, there a number of undesignated types of MHSW that are currently being offloaded to municipalities and residents. Additionally, some types of e-waste, durable goods and other recyclable materials not collected in the blue box can and ought to be designated as quickly as possible. Construction and demolition waste form a significant amount of waste in Ontario and should be designated for producer responsibility.

Organic waste is one of the largest categories of waste and also represents an important source of waste that has significant potential benefits for the environment regarding its application. There is an urgent need for the Province to create a coordinated strategy to support municipalities operating expensive organics programs. Branded organic products should be designated to provide further incentive to reduce organic waste going for disposal and provide much needed support for municipalities overwhelmed by managing organic waste.

The strategy needs a clear schedule for designating additional wastes.

The strategy needs to outline a clear schedule and plan for the designation of new materials to provide certainty and stability to support and promote green innovation and investment in recycling technology. In its current form, a timeframe for transition for the current waste streams to 2017 has been outlined. The Strategy should include a framework for additional waste reduction goals beyond 2017. Such a timeframe should also outline when re-evaluation of the current goals and approaches on specific waste streams may require new management regimes.

Disposal Bans are effective.

Bans on designated waste from disposal in a landfill or incinerator are a welcome tool for quickly reducing waste disposed, and promoting innovation and investment in improved waste reduction, reuse and recycling. The use of bans must be done carefully and with full consideration that disposal alternatives and mechanisms are in place. The process should also include accessible and effective public engagement to ensure transparency and accountability in the process.

Energy from Waste and ‘Recovery’.

We commend the province for maintaining the 3Rs in Bill 91, and advocate that incineration or thermal disposal of waste *not* be considered anything other than disposal in all future regulations. ‘Recovery’ of energy through incineration is a very inefficient process and destroys valuable natural resources for minimal energy return. In addition, incineration contributes to the on-going releases of some of the most highly toxic substances (i.e. dioxins and furans, hexachlorobenzene, heavy metals); the reduction of the use and release of these toxic substances is the focus of the Ontario *Toxics Reduction Act*.

Permitting energy from waste as a tool to meet any waste reduction standards may weaken environmental gains associated with waste reduction. Waste materials that are reused or recycled must be put to their highest and best use – as an equivalent or higher value material or product. Permitting ‘recovery of energy’ wastes the available resources and creates less energy than would be conserved by reuse or recycling of the same material. The recovery of materials

from ash following incineration and all energy from waste processes must not be permitted in meeting a Producer's obligations.

In the *Waste Reduction Act* and Strategy (including associated future regulations and standards), 'Recovery' of materials or energy from an incineration process should be limited to disposal, and not diversion or waste reduction in any form.

Part C – Comments on the Consultation Process

Enabling Legislation - Bill 91 is enabling legislation that sets out obligations for the Ministry to develop regulations on specific aspects of waste reduction, but draft regulations have not yet been released for public review. Accordingly, Bill 91 poses significant challenges for stakeholders that seek greater certainty and transparency in the decision making process. There are many concerns regarding the Bill as enabling legislation.

- 1) The legal text in Bill 91 is vague regarding the regulations to be developed and lacks a defined timeframe for completing such regulations. Furthermore, details for the development of regulations are limited.
- 2) Stakeholders, particularly non-governmental organizations, and the public will be disadvantaged by these vague processes that will be used to create the regulations. These processes may be lengthy and several regulatory making processes may be conducted simultaneously or within a narrow time frame. There are limited resources and capacity to monitor and respond to all regulatory development processes on waste reduction. Therefore, the quality of the regulatory making process may be significantly diminished with the limited engagement by the public and NGOs. To ensure this does not happen, the public and NGOs require a transparent process and sufficient resources to actively participate in the process.
- 3) There may be greater opportunities for proponents unhappy with the Bill to weaken the scope of the regulations during the regulatory development process.
- 4) The regulation-making process takes significant time and resources to complete. It may take years to initiate regulatory development for specific obligations under Bill 91. As well as ensuring active and meaningful public and NGO involvement in the regulatory development process, this process must happen as quickly as possible.
- 5) Several regulations are expected to be negotiated under Bill 91. There is greater uncertainty and confidence that key principles and goals are upheld to ensure the effective implementation of the act.

We trust that the foregoing comments will be considered and acted upon by the Ontario Government as Bill 91 and the Waste Reduction Strategy are finalized. If requested, we would be pleased to meet with you or your staff to discuss our recommendations, and we look forward to participating in the anticipated Standing Committee hearings on Bill 91 in the fall.

For further information, please contact Emily Alfred (TEA), Ramani Nadarajah (CELA) or Rick Lindgren (CELA).

Yours truly,

Toronto Environmental Alliance (Emily Alfred, Waste Campaigner; 416-596-0660)
Canadian Environmental Law Association (Ramani Nadarajah, Counsel or Rick Lindgren,
Counsel; 416-960-2284)
Citizens' Network on Waste Management (John Jackson, Coordinator; 519-744-7503)

Canadian Association of Physicians for the Environment (CAPE) (Gideon Forman, Executive
Director)
Citizens Environment Alliance of Southwestern Ontario (Derek Coronado, Coordinator)
Ecojustice Canada (Pierre Sadik, Manager of Legislative Affairs)
Environmental Defence Canada (Sara Winterton, Executive Director)
Environment Hamilton (Lynda Lukasik, Executive Director)
Durham Environment Watch (Kerry Meydam, Founder)
Durham Clear (Doug Anderson, President)
Ontario Zero Waste Coalition (Liz Benneian, Founder)
Sierra Club Ontario (Dan McDermott, Chapter Director)
Unifor Windsor Regional Environment Council (Mark Bartlett, President)
Zero Waste 4 Zero Burning (Linda Gasser & Louis Bertrand, Co-Founders)

cc: Greg Sones, Director, Waste Management Policy Branch, Ministry of the Environment
Honourable Jim Bradley, Minister of the Environment
Michael Harris MPP, PC Environment Critic
Jonah Schein MPP, NDP Environment Critic