



The Corporation of  
**The Township of The Archipelago**

9 James Street, Parry Sound, Ontario P2A 1T4

Phone: 705-746-4243 • Fax: 705-746-7301

Cindy Acab  
Resource Recovery Policy Branch  
40 St. Clair Ave W, 8th floor  
Toronto ON M4V 1M2

Dear Ms Acab,

**Re: Reducing Litter and Waste in Our Communities: Discussion Paper  
Environmental Registry Number (ERO) Number 013-4689**

As a natural wilderness jewel in Ontario, the Township of the Archipelago and its residents considers the proper management of waste a top priority. We thank you for soliciting municipalities' responses to the Ministry of the Environment, Conservation and Parks' Discussion Paper on Reducing Litter and Waste in Our Communities.

**Township of The Archipelago: Background**

The Township of the Archipelago consists of several thousand islands in Georgian Bay and a number of inland, freshwater lakes, all used for residential and/or recreational purposes; either cottages or year-round residences. The lands in The Archipelago are remote and sparsely populated. The impetus for creating The Township of The Archipelago originated from a strong desire by its inhabitants and the Province to preserve its high-quality, near-wilderness recreational character and the natural environment.

Georgian Bay is a semi-wilderness region with a significant Crown land base. Approximately 87% of the Township is comprised of Crown Land, Conservation Reserves and Provincial Parks, including The Massasauga Provincial Park which has over 40,000 visitors a year.

The Township is located within the Georgian Bay Biosphere Reserve (GBBR), a globally important region designated by the United Nations Education, Scientific and Cultural Organization (UNESCO) in 2004. Eastern Georgian Bay is the world's largest freshwater archipelago (group of islands). It is rich with coastal areas and dynamic wetlands that provide a variety of significant and critical habitat for fish, turtles, birds, aquatic organisms and various endangered species.

The Township operates one landfill site, which is shared with the community of the Shawanaga First Nation. The Township also operates eight transfer stations, including two exclusively water-access sites. Pursuant to the Provincial Approvals for our waste sites, they are all staffed. Staff are able to assist the public and provide information and guidance with respect to the disposal and sorting of waste.

The Township works with community partners including the GBBR and the science-based charity Georgian Bay Forever (GBF) as well as our ratepayers' associations to drive education and research initiatives around waste management issues and best practices.

Please find herein the Township of the Archipelago's comments on the Ministry's Discussion Paper, using the Ministry's own headings.

## **2.1 Prevent and Reduce Litter in Neighbourhoods and Parks**

Given our Township's remote road system, we are seeing illegal dumping of waste in parks, dead end streets, along their roadsides and/or on vacant lands. Litter, usually plastic, is an environmental concern on the shoreline up and down Georgian Bay and the inland lakes.

We are seeing an increase in the amount of waste left by visitors to Provincial Parks. It would be very helpful if Park staff hold visitors accountable for the waste they leave behind through fines or prohibition of future visits.

The Township of the Archipelago has very limited commercial activity: mainly marinas and a few restaurants. As integral members of our community these organizations are very diligent in their waste management.

### **Community Day of Action – What the Province Can Do**

The Township of the Archipelago is working with our community partners and local cottage associations to organize a Community Day of Action to focus on cleaning up plastic litter in our community. Products and packaging such as cigarette butts, chewing gum, drink containers, snack wrappers, fast food packaging, dock foam and beverage cups are some of the most problematic litter types in our community. We are challenging different communities to compete to see who can remove the most plastic waste from our shorelines and roads.

If the Ministry leads the way with a Provincial Day of Action, this would provide significant visibility, education and support to our own efforts in this area. We would appreciate the Province's support in any way possible including providing promotion materials, education materials, etc. The more communities can work together on the same day the more effective it will be for all key stakeholders.

### **Preventing Litter in the First Place: Enact Legislation, Regulations and Provide Enforcement Capacity**

The Province should play a legislative and enforcement role by:

- Implementing full producer responsibility for paper products and packaging (PPP) and other problematic single-use products that are most often captured as litter;
- Strengthening litter and illegal dumping laws related to roadside and shoreline litter from *cars and boats*, including meaningful punishment for offenders;
- Providing financial support for the Township's enforcement of provincial litter laws;
- Providing sufficient resources to Provincial Park staff to reduce and manage the waste produced by their users; and
- Considering banning problematic materials or packaging like plastic holders on a six pack of beer, or activities such as balloon releases.

## **2.2 Increase Opportunities for Ontarians to Reduce Waste**

The Township of the Archipelago are firm believers that the old “Three Rs” are still the best guidance, and that the Rs are in order of importance. That is, **reduce** should always be the first step, followed by **re-use**, and then **recover/recycle**. An ounce of prevention is worth a pound of cure, as they say.

Although the Discussion Paper includes recycling under the Waste Reduction heading, the Township of the Archipelago urges the Province to make this important distinction, and to consider recycling as the poor cousin to reduction.

### **Move to full producer responsibility**

As discussed under heading 2.3 below, shifting the responsibility for waste to producers will create economic opportunities, incent innovation, improve our environment, and reduce the burden on Ontario’s taxpayers. The Township of the Archipelago urges the province to make producer responsibility *the highest priority* in its waste management initiatives.

### **Seek national targets and consistent definitions & metrics**

The Provincial government should set mandatory targets that match or exceed those in other leading jurisdictions. By 2025, Ontario should have transformed the plastic packaging sector by meeting four targets:

- Along with reduction efforts, all plastic packaging should be reduced where possible, reusable or recyclable,
- A 70% target for all plastic packaging to be effectively reused or recycled including individual targets,
- Take actions to eliminate problematic or unnecessary single-use packaging items through redesign, innovation or alternative (reuse) delivery models, and
- A target of 50% average recycled content across all plastic packaging.

### **Address issues related to single-use packaging and problematic materials**

The Province should work with the federal government to target action, such as bans, fees, or recycled content requirements, to reduce the use of disposable single-use products and eliminate problematic plastics and plastic additives.

## **2.3 Make Producers Responsible for Their Waste**

The Township of the Archipelago firmly believes that the Blue Box Program should transition to full producer responsibility via regulation under the RRCEA, and that the Minister initiate this process as soon as possible. The Township endorses the approach as outlined in a letter from AMO President Jamie McGarvey to Minister Phillips on March 19, 2019.

It is particularly important that the RRCEA comprises all municipalities. Cherry-picking high-volume municipalities is inequitable to a municipality like the Township of the Archipelago that has the waste management complexity of a mainland and off-shore community and the additional cost of transferring waste over water from remote transfer stations.

We believe the current Blue Box system is not working. It is costly for all stakeholders and, without substantive changes, these costs will continue to increase municipal budgets and impact Ontario tax and rate payers. Making producers fully responsible for managing the PPP that they supply into Ontario will fundamentally change this structure. Producers are best positioned to reduce waste, increase the resources that are recovered and reincorporated into the economy, and enable a consistent, province-wide system that makes recycling easier and more accessible.

The RRCEA ensures transparency. It focuses on outcomes over process, provides producers with flexibility in decision-making, and ensures proper oversight and enforcement. It also moves us away from a process that requires constant government intervention.

The transition to producer responsibility should reduce consumer confusion about what is recyclable and what is not; those that are not should ultimately be phased out through a successful implementation of the program. The current Blue Box Program should continue in place until full producer responsibility renders it redundant.

The Right to Repair is also an important component of making producers responsible for their products and the waste they produce. The Province should recognize a consumer's right to repair, reducing "planned obsolescence" and other commercial practices that make it more convenient for a consumer to buy new than to extend the life of what they have.

### **Ensure stranded materials are addressed**

Permanent and dedicated federal and/or provincial funding will need to address products and packaging that do not have an identifiable producer responsible.

### **Additional Products to Consider under Full Producer Responsibility**

The Township of the Archipelago, which accepts large items at its transfer stations and landfill, supports the expansion of full producer responsibility to a number of items that the discussion paper references (e.g. small and large appliances, power tools, rechargeable batteries, fluorescent bulbs and tubes, carpets, mattresses, clothing and textiles, furniture and other bulky items). We urge the Ministry to consider including these additional items:

- Any product or package with an electrical current;
- "Compostable" products and packaging;
- Construction and demolition waste;
- Durable plastics such as children's toys, play structures, outdoor patio furniture and like products; and
- "Flushable" products.

## **2.4 Reduce and Divert Food and Organic Waste**

We support the Ministry's work on reducing and diverting food and organic waste and appreciate the consideration shown to the unique circumstances faced by rural, northern and remote communities in delivering waste services. However, we must highlight that the lack of a funding source for implementation of these programs remains a challenge. Financing and operating organics waste diversion program implementation will be difficult for many communities.

The Township of the Archipelago does not have a separate food/organics waste stream (it currently goes to landfill). We have had to put electric fencing around our waste transfer stations to keep bears from spreading waste. Residential composting of food waste is not feasible for most of our residents, given the risk of bears; indeed, bears have broken into cottages repeatedly just to get a scrap of food left behind.

We support in principle the idea of a food waste ban, but without a present alternative, ask the Ministry proceed by way of evolution over revolution: food and organic waste bans should be implemented over a 5- to 10-year period to provide time for adequate infrastructure to be put in place, to allow entities to take appropriate steps to reduce waste, and for economies of scale to be developed. The Province must also recognize that such changes will come with significant financial pressure on the municipalities. We will need adequate support to effectively implement them.

We strongly support initiatives that would *prevent* food waste and agree with the Ministry's recommendations to build a culture of food waste avoidance. We support in principle the safe donation and rescue of surplus food, but we have so few businesses this would have little relevance to our particular municipality. We recommend that the Ministry convene multi-stakeholder roundtables to address each of these recommendations, including in rural communities. The Township would be interested in participating in such activities, and we see a role for the municipality in the areas of education and community engagement.

## **2.5 Reducing Plastic Waste Going into Landfills or Waterways**

Georgian Bay Forever has done some excellent research regarding micro-plastics: <https://georgianbayforever.org/microplastics-impacts/> . Their research has revealed that a significant percentage of micro-plastics in our water come from clothing and textiles. It would be irresponsible to ignore this significant plastic contributor. The Province has the responsibility and ability to mitigate a significant amount of micro-plastics by mandating that washing machines sold in the province come with a micro-fiber filter similar to a dryer lint filter.

The Township of the Archipelago and its residents collaborate with and provide funding to the Georgian Bay Biosphere Reserve and Georgian Bay Forever to help educate our community and support environmental protection and research like the microplastics research.

Larger (macro) plastic waste/litter issues have been addressed under headings 2.1 to 2.3 above.

Education and outreach campaigns on the root causes and negative environmental effects of waste products and packaging in and around all bodies of water should be created. The Township would take an active role in such campaigns.

## **2.6 Provide Clear Rules for Compostables**

Existing organic processing infrastructure in the province has been primarily designed for treatment of food waste and items like soiled paper products, and not compostable products and packaging waste. Ensuring successful degradation of compostable products and packaging will require changes and upgrades to existing facilities that are costly and impacts to beneficial end products such as biogas and compost are not known. These upgrades should not be funded by taxpayers.

The Township of the Archipelago believes that producers of compostable products and packaging should be responsible to meet the associated outcomes established under a RRCEA regulation. Property taxpayers should not have to pay for a system when they have no influence over the types of materials entering the waste stream. Government policies should focus responsibility on the parties that can most effectively and efficiently drive change: the producer.

## **2.7 Recover the Value of Resources**

The Township of the Archipelago agrees that recovery in the context of a waste hierarchy is better than landfill, but lower value than reduction or recycling. The Township's landfill has a limited life span. Recovery and/or recycling must be available to all municipalities in order for it to be effective. This cannot be a Toronto-centric solution.

The Province's policy priority should be to reincorporate resources into new products and packaging in support of the broader objective of promoting a more circular economy for Ontario. The federal government has a major role in this as well. Having expanded definitions and recovery solutions that keep valued materials out of landfills and not discarded on the ground will help municipal governments with current and future waste management systems.

### **Support end markets**

Discussed further below, the Province should work with the federal government to provide support for recyclable commodity markets to incentivize the use of secondary materials over virgin material through tax incentives and procurement practices.

## **2.8 Support Competitive and Sustainable End-Markets**

With a proposed landfill ban pending, it may be necessary to consider a co-operative, concurrent approvals process for resource recovery systems. This would assist the Township of the Archipelago to work together with other municipalities in the West Parry Sound District to develop processing infrastructure to navigate the required approvals under both the *Planning Act* and the *Environmental Protection Act*. A streamlined process would benefit from consistent teams of provincial staff working with us from pre-consultation on siting, land use and ECA approvals, through to commissioning and operation.

## Conclusion

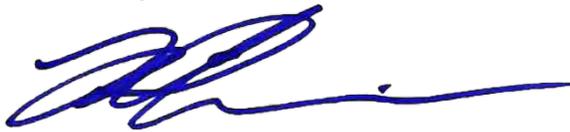
The Township of the Archipelago firmly believes that the Province's highest priority in waste management should be implementing full producer responsibility. This will result in improvements under all the other headings in the Discussion Paper: litter (on land and water), waste reduction, recycling and recovery. It will also shift, as it should, the burden of waste management off the backs of taxpayers, who often have little choice in the products they purchase or in the options they have to dispose of them.

The Township also encourages the Province to focus on waste *reduction* at all levels. It is better not to have to produce a thing in the first place than it is to decide what to do with that thing when it reaches the end of its useful life. This is especially true of packaging, whose useful life is fleeting. This could potentially move the spectre of landfill expansion to that of landfill remediation.

The Township of the Archipelago staff have comprehensively optimized the management of waste within our Township. However, it is unreasonable to place the burden of major changes to the waste management system onto the taxpayers.

Thank you again for the opportunity to provide feedback.

Sincerely,



Bert Liverance  
Reeve, Township of the Archipelago

CC: The Honourable Rod Phillips,  
Ontario Ministry of the Environment, Conservation and Parks