

21 Reeve Street
Woodstock, Ontario
N4S 7Y3
info@futureoxford.ca

March 18, 2021

Allison Deng
Resource Recovery Policy Branch
40 St. Clair Avenue West, 8th floor
Toronto, ON M4V 1M2

**RE: Proposed producer responsibility regulation for Hazardous and Special Products (HSP),
ERO Posting # 019-2836**

Dear Allison:

Zero Waste Oxford is a committee of community members under the Environmental Pillar of Future Oxford's Community Sustainability Plan. Its membership includes laypersons interested in the prevention and reduction of waste as well as some professionals with subject expertise. The following is submitted by Zero Waste Oxford in good faith with an intent to assist the province in moving hazardous and special products under the Waste Authority and out of the environment.

More, Better, Sooner

Zero Waste Oxford thanks the Ministry of the Environment, Conservation and Parks for the opportunity to comment on producer responsibility for hazardous and special products, as well as for seeking to move them to full producer responsibility as suggested in the Made-in-Ontario Environmental Plan draft. This fits our view that more, better and sooner need to be watchwords for producers, vendors, handlers, users and the Province. By their nature, hazardous and special products require the utmost caution, start to finish. Otherwise, harmless and recoverable resources, if contaminated with hazardous and special product waste, can become dangerous themselves.

Supporting Economic Growth and Innovation

Zero Waste Oxford encourages the Ministry through its work to ensure that full producer responsibility means full cost accounting. Previous regimes have pushed costs into municipalities; Full producer responsibility would mean that none of these costs should be

externalized. Manufacturing, delivery, storage, use, and disposal are critical in their handling. Pick-up has to be safe and convenient for users. We are glad to see that the number of pick-up points is high and stays in proportion to points of sale. Currently, our municipality provides drop-off points for a wide variety of hazardous products. These public assets must not be stranded by a move to full producer responsibility. The public has invested in them; their past and current cost needs to be recouped from the new program, or they need to be included in the new program with payment to the municipality for their continued use. Similarly, private businesses locally collect and recycle some products, paint for instance. It would be wise to include them in pick-up points under the regulations for the sake of convenience of residents, and to recognize the investments in money and time made by those businesses.

Improving Environmental Outcomes

The reduction in quantities of waste produced is a goal. When costly recovery of low-value resources is necessary, it makes more sense to radically reduce the entry of those products on the market or to ban them entirely. While the suggestion that the disposal of fertilizers can be averted by sharing the remaining quantities, we are aware that an over-abundance of phosphorus from fertilizers is having significant negative impacts on waterways in South-western Ontario especially the lower Great Lakes. Given the added benefits of organic material to land, it would seem logical to reduce chemical fertilizers, to replace them with organic compost or digestate as far as possible to increase soils' retention of moisture and friability. This means that a diminution of supply of hazardous and special products would help solve a problem with quantities of organic waste. This principle of simplification and beneficial consequences could be applied more broadly: Where the variety of products is smaller, their sorting and recovery will be more successful. Some products will need to be banned, as suggested in the Made-in-Ontario Environmental Plan. Reductions elsewhere can be achieved through education and persuasion as well as green procurement at the provincial and municipal levels. Market factors can spark creativity on the part of producers.

Safe and Healthy Communities

In the area of Hazardous and Special products, education means safety. It is therefore important that producers and vendors have a good understanding of the dangers associated with these products and share them with end users. They can assist in motivating users to keep them out of other waste streams, to handle them with extreme caution, to consider less-hazardous alternatives (harm reduction), and to direct them to the producers for resource recover once finished. Pick-up, haulage and disposal are all moments where ignorance and/or negligence could be very dangerous.

The province of Ontario led in the banning of cosmetic pesticides once it had determined their danger to environmental and human health. It did not take long for the public to adapt to different practices and aesthetics. These shifts should also be possible for Hazardous and Special Products. In fact, when certain products are becoming rare in use, users will want to avoid being the last to see out proper disposal, thus accelerating the rate at which we move to a circular economy.

Zero Waste Oxford encourages the Ministry of the Environment, Conservation and Parks to move with due haste and care to full producer responsibility for hazardous and special products as well in other parts of the current waste stream. Our group is prepared to help both with framing this work and with the execution of it. We look forward to more.

Submitted by:

Bryan Smith, Co-Chair

On behalf of Zero Waste Oxford