



Hamilton

City of Hamilton EBR Comments

Regulations under the Waste Diversion Transition Act, EBR Registry Number: 012-7818

As a member of the Regional Public Works Commissioners of Ontario (RPWCO), the City of Hamilton is supportive of the proposed regulations under the Waste Diversion Transition Act, 2016 as outlined in EBR Registry Number 012-7818. The following are the City of Hamilton's comments regarding the newly proposed Waste Diversion Transition Act ("WDTA"):

1. The City of Hamilton is supportive of the adoption of the proposed WDTA as it will improve the Resource Productivity and Recovery Authority's (RPRA) enforcement capability during the transition of existing waste diversion programs and Industry Funding Organizations (IFOs) to the new producer responsibility framework under the Resource Recovery and Circular Economy Act, 2016 (RRCEA).
2. It is essential the RPRA ensures there is a smooth transition of the existing waste diversion programs and develops a new fair integrated waste management system under the RRCEA.
3. The Province must ensure existing waste diversion programs will continue to be provided to the public under the WDTA without disruption until their wind-up.
4. Municipalities have a major role in the operation of existing waste diversion programs in the Province for Blue Box materials, municipal hazardous and special waste, waste electronic and electrical equipment, and used tires. The development of the WDTA must consider contractual, financial and other operational impacts experienced by municipalities. It is imperative municipalities be involved in discussions, assessments, program design, implementation, and monitoring as a key stakeholder of the waste management system in Ontario. The Province shall ensure municipalities are engaged during the development process of the transition plans.
5. Funding for municipal waste diversion programs, including the Blue Box program, must be determined in a transparent and accountable manner.
6. It is recommended the Province require producers pay for actual total net costs incurred by municipalities in order to fairly compensate municipalities for their services and to completely transition to full producer responsibility.
7. It is challenging for municipalities to plan their waste management services to support continuous improvement due to the uncertainty around the transition of existing waste diversion programs. It is recommended the Province finalize transition plans in a timely and expedited manner.