



March 19, 2013

Regional Councillor Mr. Vito Spatafora
Chair - Environmental Services Committee
The Regional Municipality of York
C/O Office of the Regional Clerk
17250 Yonge Street, 4th Fl.
Newmarket, ON., L3Y 6Z1

Dear Councillor Spatafora:

Re: Follow-up on the Sewer Use By-law Prohibition of In-Sink Food Waste Grinders

Spinnaker Recycling Corp. wishes to offer our experience-based perspective on waste diversion with respect to the York Region's consideration of the benefits and impacts of food waste disposers. Spinnaker Recycling Corp. specializes in waste diversion strategies within the multi-residential sector, and as such, serves as a resource to municipalities, companies and industry associations. Over the past five years Spinnaker Recycling Corp. has conducted more than 300 audits of multi-residential properties within the Greater Toronto Area and the surrounding regions.

We participated in the first workshop organized by York Region; we were most impressed by the expert evidence provided by industry stakeholders regarding the growing acceptance of the use of food waste disposers in cities around the world, and the well-researched technical and best-practice evidence supporting that acceptance.

Our perspective remains the same as expressed in our letter in September 2012: that the York Region should reconsider and rescind its ban on food waste disposers in all types of housing within the region. The Region should not deprive its residents of a convenient and effective tool for their use in achieving the Region's important environmental goals.

Based on our experience and the typical results that are seen within the multi-res sector by municipalities waste diversion within multi-residential properties is challenging, whether in the rental or condominium environment. Food waste diversion, even with seemingly progressive two or three-chute systems, or tri-sorters on single-chute systems, is by far the most challenging. Participation and diversion by residents is typically low, and is difficult for buildings to manage (odour concerns in chutes, increased need for cleaning, etc.). Even San Francisco acknowledges that 40% of multi-residential residents do not participate in its mandatory green-bin program.

Also recognized at the workshop is that older buildings do not have modern chute-based infrastructure, forcing the collection of food waste materials to another collection point; that approach reduces the all-important convenience of the system, which in turn reduces its effectiveness and increases costs.

There is no question, however, that in-sink food waste grinders significantly improve the diversion of food scraps; they also ensure that food scraps otherwise sent down sinks and toilets benefit from a reduction in particle size, decreasing the likelihood of pipe clogs.

For both old and newly-constructed multi-residential buildings, it was suggested that some concessions might be made for the installation of in-sink food waste grinders – which implicitly suggests that their impacts might not be as severe as suggested by York Region staff and its consultants.

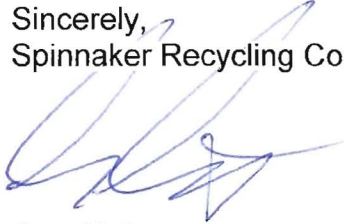
If the exception for multi-residential buildings is adopted, logically the installation of in-sink food waste grinders should not be an issue in all types of residences.

Therefore, Spinnaker Recycling Corp. continues to recommend that the prohibition of food waste grinders be fully rescinded, or at the very least, tabled pending the results of studies that can lead all parties to a better understanding of the real impacts of these appliances.

We especially welcome the York Region's consideration of one or more case studies that would provide more and better data regarding the efficacy of disposers as a waste diversion tool in all types of housing. Waste audits of homes/subdivisions/multi-res buildings that have in-sink units should be undertaken to understand the impact upon green bin waste diversion, and by extension, the amount of solids making their way down the drains.

Spinnaker Recycling Corp. appreciates the opportunity to submit comments and we look forward to future opportunities for stakeholder engagement. Please feel free to contact the undersigned if you have any comments or concerns.

Sincerely,
Spinnaker Recycling Corp.



Gerald Grant,
President

Cc Mr. Bill Fisch, Chairman and Chief Executive Officer
Mr. Bruce Macgregor, Chief Administrative officer
Environmental Services Committee members
Regional Clerk