

Mr. Vito Spatafora
Chair, Environmental Services Committee
The Regional Municipality of York
17250 Yonge Street Newmarket, Ontario L3Y 6Z1
vspatafora@richmondhill.ca

Re: Sewer Use By-law No. 2011-56, Prohibition of Food Waste Disposers

Dear Mr. Spatafora,

The Association of Home Appliance Manufacturers Canada (AHAM) appreciates the consultation workshops arranged by the Region of York held on November 8, 2012 and January 16, 2013 concerning the Region of York's proposal to prohibit the installation of Food Waste Disposers (FWD). It is unfortunate that such a consultation did not occur prior to adoption of the Model Sewer Use By-law, as the information shared and dialogue among stakeholders might very well have yielded a different initial recommendation to the Committee. FWD play an important role as a consumer-friendly household tool in achieving organic waste diversion and environmental goals. People use FWD to improve their lives by saving time, improving sanitary conditions in the home, and helping improve the environment.

AHAM is the industry trade association representing the manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM membership includes over 150 companies throughout the world. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances are a success story in terms of energy efficiency and environmental protection.

Best Practices

We believe that the technical, financial and best practice research that was provided by our AHAM member companies for your consideration clearly demonstrated that FWD can play a useful role for diverting food waste scraps from landfill, thereby helping to achieve the goals of the Province and the Region. In comparison to human waste that flows through the York region wastewater infrastructure and facilities, the food scraps processed by FWD do not impose inordinate environmental or economic costs on the Region and its facilities, making it an essential complement to other York Region organic diversion programs.

Benefits of FWD

During the Consultation workshops we continually heard about the unique York Region situation that raised concerns about the use of FWDs. To be clear, we have not found the Region of

York's sewer and wastewater facilities and infrastructure to be unique in respect to use of FWD when compared to similarly sized municipalities. Quite telling, we find that the aforementioned research, information and data that was provided to York Region demonstrates that a growing majority of 21st century cities are encouraging the installation and use of Food Waste Disposers as an effective tool for managing food scraps and for creating a liquid resource rich in organic material for the production of clean water, biogas, and fertilizer products. In the waste water treatment industry, trends underscore that the liquid organic waste stream increasingly is regarded as a resource to be harnessed, not as a waste stream with no value.

Creation of Three-Tier System for FWD

The proposed amendments by York Region to the Sewer Use by-law appear to allow existing FWDs to remain in place and be replaced as necessary, while prohibiting the new installation of FWD in single residential dwellings. That distinction is unwarranted and unnecessary, and from a practical standpoint unenforceable; FWDs will continue to be available for sale as the Region does not have the authority to prohibit the sale of these legal products, nor compel retailers to post notices.

Moreover, the proposal to allow for the installation of FWD in multi-residential dwellings, with the written consent of the region and under conditions that have not yet been defined, will cause significant public confusion. The multi-residential dwelling proposal creates a public policy whereby the residents of multi-residential dwellings may have access to FWD whereas residents in single residential dwellings will be prohibited from being able to enjoy the convenience and sanitary ability to dispose of food waste scraps.

AHAM is opposed to establishing public policy that treats consumers in the York Region differently whereby residents in a single residential dwelling are offered less opportunity to improve their standard of living if they so choose than others. As a matter of good public policy AHAM is opposed to creating this three-tiered system.

Conclusion

We respectfully submit that the body of technical research, data, and best practices provided to York Region by AHAM member companies is compelling and has provided sufficient evidence to conclude that FWD – at both current and projected installation levels – will not be detrimental to the Region's existing sewer infrastructure and wastewater treatment facilities. In fact, FWDs would play an important role as a consumer-friendly household tool in achieving the Region's organic waste diversion and environmental goals.

Therefore, AHAM remains strongly in opposition to York Region's proposal to prohibit new installations of FWD. FWD should be regarded as a compelling and complementary food waste diversion tool for use in all residences, including single dwelling properties.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Bruce Rebel".

Bruce Rebel
Vice-President and General Manager

CC:

Mr. Bill Fisch,
Chairman and Chief Executive Officer (CEO)
regional.chair@york.ca

Mr. Bruce MacGregor
Chief Administrative Officer
bruce.macgregor@york.ca

Ms. Erin Mahoney
Commissioner, Environmental Services
erin.mahoney@york.ca

Ms. Michele Samuels
Manager, Regulatory Compliance and Policy
michele.samuels@york.ca

Mr. Denis Kelly
Regional Clerk
regionalclerk@york.ca

Ms. Ghislaine Boulianne
Environmental Service Committee Coordinator
Ghislaine.Boulianne@york.ca