

Sent by Fax to: 416-314-6748

September 3, 2007

The Honourable Laurel Broten
Minister of the Environment
135 St. Clair Avenue West, 12th floor
Toronto, Ontario M4V 1P5

Dear Minister Broten:

This year marks the first opportunity to review the provisions and intent of the Waste Diversion Act (WDA). While many facets of the Act have served both industry and municipalities well in establishing and governing the cost management framework, the Association of Municipalities of Ontario (AMO) and Association of Municipal Recycling Coordinators (AMRC) regard this review as a timely opportunity to provide a needed impetus for policy and program leadership to be reflected within the WDA and the governance structure of Waste Diversion Ontario.

AMO and AMRC have also taken the opportunity to put forward a new recommendation before delving into specific recommendations for the *Waste Diversion Act*. Following up on our joint response to the draft **Policy Statement on Waste Management Planning**, AMO and AMRC recommend that the Ministry of the Environment review the need to put in place stand-alone comprehensive legislation governing virtually all waste management matters. Like drinking water, solid waste matters are of prime importance to all Ontario residents. There is a need for consistency, clarity of direction and comprehensive rules for all sectors (municipal, industrial, commercial and institutional).

It is AMO and AMRC's position that our recommended changes for the *Waste Diversion Act* would fit nicely into one piece of legislation – with only one Part addressing waste diversion matters. The rest could deal with waste management auditing and planning, waste approvals (Part V of the EPA), recycling, composting, landfill disposal and thermal treatment matters. AMO and AMRC recommend virtually all waste management matters be handled under one piece of legislation, with the exception of environmental assessment requirements relating to waste management projects which would continue to be governed by the *Environmental Assessment Act* and its regulations.

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It is AMO and AMRC's position that the recommendations contained within the attached discussion paper continue to ensure fairness and transparency in the legislation as well as meet the needs of our members.

AMO and AMRC look forward to working with the Province to address municipal concerns as part of the Act's pending five-year mandatory review and will be submitting a separate discussion paper on specific amendments as part of that review.

Sincerely,



Doug Reycraft
President



Mike Birett, Chair, Board of Directors
Association of Municipal Recycling
Coordinators (AMRC)

Attached

cc: John Gerretsen, Minister, MMAH
John Vidan, Director, Waste Management Policy Branch, MOE
Peter Hargreave, Senior Policy Advisor, Land & Waste, Minister's Office, MOE
Derek Stephenson, Program Manager, Stewardship Ontario
Gord Miller, Environmental Commissioner of Ontario
AMO-AMRC Waste Task Force
Vivian De Giovanni, Executive Director, AMRC

