Waste Management | Sustainability Services

Waste to Resource Assessment

Prepared for:

UNITY HEALTH TORONTO

Caring hearts. Leading minds.

Unity Health Toronto - Providence Healthcare
3276 St. Clair Ave. E., Scarborough, Ontario
March 28, 2024

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This assessment is designed to exceed the minimum guidelines for performing waste assessments as set forth by the US EPA and Canadian provincial regulatory authorities. This report has been prepared for the specific purpose(s) contained herein. To the extent that statements and information provided by the client, its representatives, or partners have been used in the preparation of this report, Sustainability Services and Waste Management of Canada Corporation relied upon the same to be accurate, and for which no assurances are intended, and no representations or warranties are made. Sustainability Services and Waste Management of Canada Corporation make no certification and gives no assurances except as explicitly set forth in this report. This report and the information contained herein, is produced for the expressed use of Unity Health Toronto - Providence Healthcare, Scarborough, Ontario. Sustainability Services and Waste Management of Canada Corporation specifically prohibit redistribution of this report and the material contained herein in whole or part without expressed written permission of Sustainability Services and Waste Management of Canada Corporation.

Executive Summary

On March 28, 2024, Sustainability Services conducted a Waste to Resource™ assessment for Unity Health Toronto - Providence Healthcare located at 3276 St. Clair Ave. E. in Scarborough, Ontario. A few goals of the assessment were as follows:

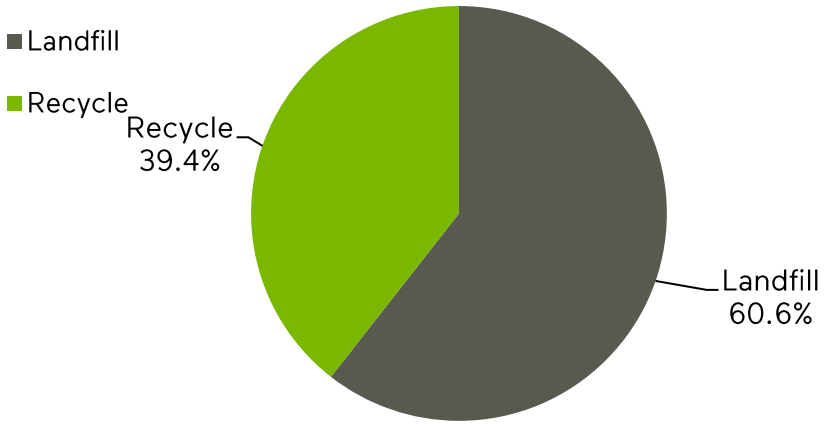
- **Update baseline inventories for waste generation at Unity Health Toronto - Providence Healthcare**
- **To identify and quantify waste composition and commodity**
- **To determine the recovery performance of existing programs**
- **Identify opportunities to further increase diversion and reduce cost**
- **Develop strategies that could be implemented throughout the facility**

Our goal is to provide Unity Health Toronto - Providence Healthcare with strategies that will maximize the efficiency of your waste diversion system. During the waste assessment conducted by Sustainability Services, visual inspections of waste generation points throughout the facility resulted in the discovery of additional diversion opportunities. The assessment identified five primary opportunities that should occur to improve your overall waste diversion rate. The following are our recommendations:

- **Increase Awareness of Current Diversion Programs**
- **Employee, Contractor, and Visitor Education and Engagement**
- **Ensure Effective Diversion Infrastructure**
- **Organization Wide Guidelines and Labelling**
- **Continual Improvement and Additional Recommendations**

The facility generated a combined 402.29 tonnes of waste and diverted materials in the last year. The current diversion rate for your facility is 39.4%.

Figure 1– Current Diversion Rate at Unity Health Toronto - Providence Healthcare



A team of sustainability consultants performed an assessment that involved a walkthrough of the facility and a targeted sort and weigh analysis of the waste stream. The following is a summary of key findings identified during the assessment:

- **The current diversion rate is 39.4%**
- **Annually, it is estimated that 243.62 tonnes of waste and 158.67 tonnes of diverted materials will be generated from your facility**
- **Of all the material generated on site, up to 64.6% potentially could have been diverted through currently available diversion programs**
- **Papers account for 28.8% of the waste sent to landfill**
- **Plastics account for 17.8% of the waste sent to landfill**
- **Organics account for 12.9% of the waste sent to landfill**

Assessment Findings and Goals Alignment

Facility Information

Table 1 – Facility Information

Item	Comments
Facility Name:	Unity Health Toronto - Providence Healthcare
Description:	Unity Health Toronto - Providence Healthcare is a health-care organization and a leader in rehabilitation, palliative care, long-term care, and community programs in Toronto
Address:	3276 St. Clair Ave. E., Scarborough, Ontario
Contact Name:	Punya Ross
Contact Number:	416-285-3666

Table 2 – Assessment Summary

Item	Comments
Performed By:	Christopher Doyle
Performed On:	March 28, 2024
Report Written:	Christopher Doyle
Report Reviewed:	Christopher Doyle
Assessment Type:	Waste to Resource Assessment – Waste Audit
Assessment Level:	☑ Basic Material Characterization ☐ Detailed Material Characterization ☑ Basic Options Analysis ☑ Detailed Option Analysis ☐ Carbon Analysis ☐ Material Process Mapping ☑ Implementation Feasibility Analysis ☑ Action Plan
Account Manager:	Keira Toscan

Goals, Objectives, and Other Factors

The following is a list of company goals, objectives, or other factors considered during this assessment.

- **Apply findings from the waste audit to reduce waste, maximize collection of recycling materials and optimize waste management efficiencies**
- **Set goals, monitor waste generation, and track recovery levels on a regular basis**
- **Streamline and standardize handling routines of materials throughout the facility**
- **Reduce waste spend and disposal costs**
- **Provide ongoing and improved employee training and education avenues**
- **Identify areas of new or enhanced diversion opportunity**
- **Increase capture rate of divertible materials and reduce overall generation of non-recyclable materials**

Regulatory Requirements

The facility took initiative to conduct a solid nonhazardous waste audit in effort to adhere to Ministry of the Environment, Conservation and Parks Regulations 102/94 and 103/94. Under O.Reg. 102/94, all waste audits must address:

- Identify the amount, nature and composition of the waste generated in designated functional areas of the facility;
- How the waste is produced, including relevant management decisions and policies;
- How the waste is managed; and
- The extent to which materials or products used or sold consist of recycled or reused materials or products.

According to O.Reg. 102/94, the Waste Reduction Work Plans or a summary of the plan must be posted at the facility in a place where it can be viewed. If a summary of the work plan is posted, the full Work Plan must be made available for review upon request by any employee.

- The waste audit report and waste reduction work plan must be retained on file for a minimum of five years;
- A waste audit report and waste reduction work plan must be conducted and updated annually.

Please see Appendix 6 – Ontario's 3Rs Regulations for more details or https://www.ontario.ca/laws/regulation/940103 and https://www.ontario.ca/laws/regulation/940102 for the full regulations.

PART IX
HOSPITALS

46. This Part applies to the operator of a public hospital classified as a class A, B or F hospital in Regulation 964 of the Revised Regulations of Ontario, 1990. O. Reg. 102/94, s. 46.

47. (1) The operator shall conduct a waste audit covering the waste generated by the operation of the hospital. The audit shall also address the extent to which materials or products used consist of recycled or reused materials or products.

(2) After conducting the waste audit, the operator shall prepare a written report of the audit.

(3) In every year following the initial waste audit, the operator shall update the audit and prepare an updated written report. O. Reg. 102/94, s. 47.

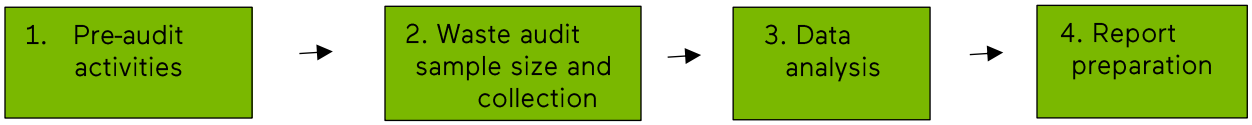
Options Overview

Five options were identified during the assessment. The table below lists key options that represent the most significant opportunities.

Table 3 – Options Summary Table

Option	Description	Benefit	Rationale
Increase Awareness of Current Diversion Programs	Stakeholders need to receive consistent messages about current diversion programs.	✓ Increases diversion and capture rates ✓ Reduced waste spends	Majority of the materials generated throughout the facility can be diverted from landfill though current reuse, recycling, or compost programs.
Employee, Contractor, and Visitor Education and Engagement	All stakeholders need to receive consistent messages about current diversion programs available to them.	✓ Increases awareness on environmental programs and issues ✓ Increased efficiencies ✓ Ensures effective education is offered	All stakeholders need to be encouraged and re-educated regarding waste and recycling procedures within the facility. Dedicated and knowledgeable staff will create the opportunity for the facility to achieve superior capture rates and manage an effective program.
Organization Wide Guidelines and Labelling	Create signage to aid all program users.	✓ Customized to be most effective ✓ Provides resources for employees	Implement signage to improve facility-wide capture rate.
Ensure Effective Diversion Infrastructure	Ensure receptacles and signage is present.	✓ Increases efficiencies in program and reduces gaps	Take measures to help users and set up the diversion program for success.
Continual Improvement and Additional Recommendations	Continually improve the waste diversion program on site. Monitor and effectively manage all programs and methods in place at the facility.	✓ Expands programs available ✓ Ensures the tools and infrastructure are in place to support diversion goals	Control decision-making and input regarding materials brought into the facility. Determine how best to capture non-traditional materials for recycling or reuse.

Sampling Methodology



1. **Pre-audit activities** - Collecting background information (such as identifying occupancy rate, changes in collection services), historical data, diversion reports, receptacle service information, etc. Establishing the plan for the assessment. Conducting a site tour of the facility to review procedures and current infrastructure.

2. **Waste audit and sample size** - To characterize the material stream, visual observations, and waste samples (non-hazardous solid waste) were obtained from various collection areas throughout the facility. These collection areas were identified from labels placed on the waste bags or collection receptacle. For the purposes of this assessment, a sample **generation area** is a combination of a specific collection area or department and/or waste generating process. The sample material was collected in a safe and designated location separate from other waste collection areas for the assessment.

   During this assessment, samples were collected from 5 unique generation areas throughout the facility over a 24-hour period. For the purposes of this project, it is assumed that the sample period chosen is a fair representation of typical activities and waste generation at the site, although daily variances are possible. The materials were sorted and divided into up to 10 waste categories and weights of each material sub-category (up to 90) were recorded.

3. **Data analysis** – Analysis of on and off-site data provided by WM and the client. Calculation of diversion and capture rate for the site. Annual projection calculations were determined using the weights of the samples projected against the facility's operational days.

4. **Report preparation -** Full report prepared including site specific recommendations and Ministry of the Environment, Conservation and Parks - Audit and Workplan forms.

Limitations

A small amount of the collected sample was unlabeled; therefore, it was not possible to identify the origin of the sample from within the facility.

Hazardous, Industrial, and Liquid Industrial Wastes were not included within the scope of this assessment. These materials are not typically included in MOE Reg. 102/94 solid waste audits and specialized processes are required to handle these materials due to the health and safety concerns associated.

Staff may occasionally dispose bulk materials (e.g., broken furniture) in landfill. These materials may not be collected in the audited sample and as a result are not included in the assessment.

A portion of the sample bags included diapers and medical fluids, auditors conducted limited or simple sorting of these sample bags.

Material Composition Breakdown

Landfill Waste Material Comparison by Category

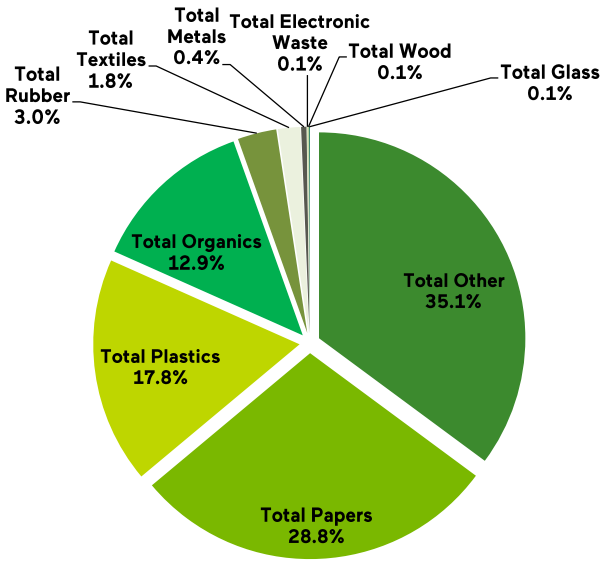
This section displays a breakdown of general material categories by weight and volume. The largest category by weight was other materials which represented 35.1% of the landfill waste stream.

Table 4 – Landfill Waste Material Comparison

Waste Category	Total Audited Waste Material (kg)	Material Composition (%)	Annual Projected Volume Generated (kg)
Total Other	106.66	35.1%	85,625
Total Papers	87.28	28.8%	70,069
Total Plastics	53.92	17.8%	43,286
Total Organics	39.06	12.9%	31,357
Total Rubber	9.25	3.0%	7,423
Total Textiles	5.32	1.8%	4,271
Total Metals	1.29	0.4%	1,036
Total Electronic Waste	0.28	0.1%	225
Total Wood	0.21	0.1%	169
Total Glass	0.20	0.1%	161
Total	**303.47**	**100.0%**	**243,620**

Figure 2 below represents the generation areas at the facility.

Figure 2 – Landfill Waste Material by Category



Audited Waste Material Composition by Sample Collection Area

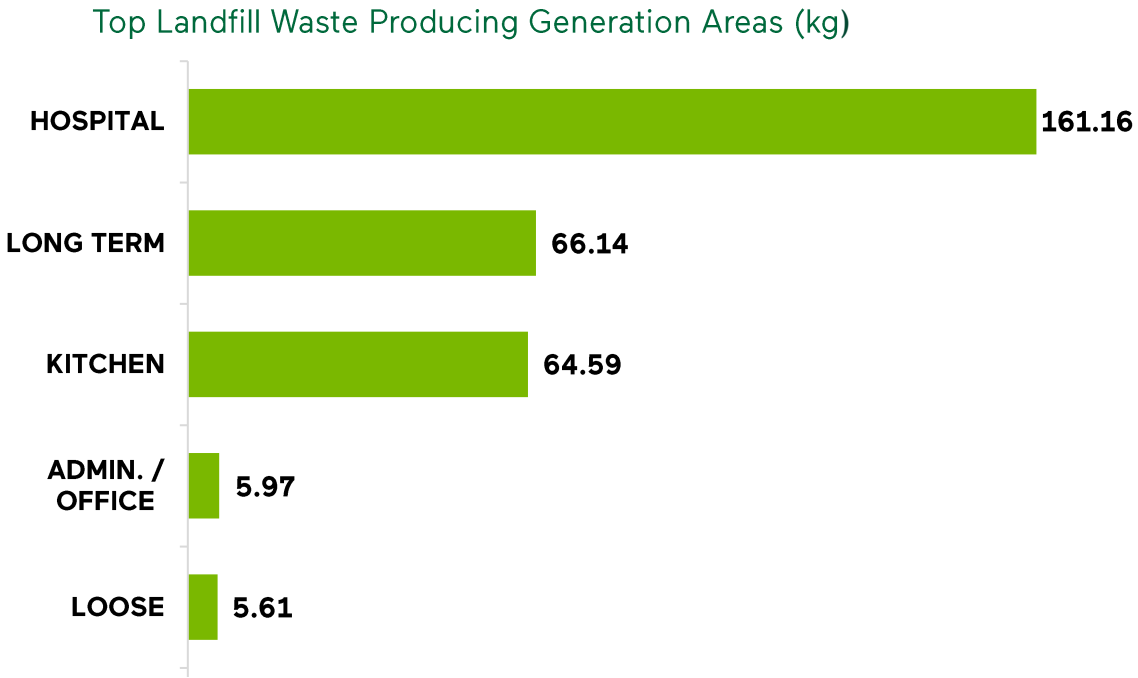
The following table displays a breakdown of the waste sources during the assessment. For further in-depth analysis of the generation areas identified, consult Appendices and (if requested) Supplementary Data. The largest generation area identified was the HOSPITAL generation area representing 53.1% of the audited sample.

Table 5 – Audited Waste Sources

Generation Area	Total Audited Waste (kg)	Generation Composition (%)	Annual Projected Volume (kg)
HOSPITAL	161.16	53.1%	129,377
LONG TERM	66.14	21.8%	53,092
KITCHEN	64.59	21.3%	51,852
ADMIN. / OFFICE	5.97	2.0%	4,796
LOOSE	5.61	1.8%	4,504
Grand Total	**303.47**	**100.0%**	**243,620**

Figure 3 below represents the top five generation areas identified at the facility.

Figure 3 – Waste Generation by Collection Area



Diversion Opportunities

Increased diversion opportunities represent the largest potential cost savings and landfill diversion opportunity for Unity Health Toronto - Providence Healthcare. While diversion programs are currently in operation, the audit shows that they are not working at their optimal efficiency.

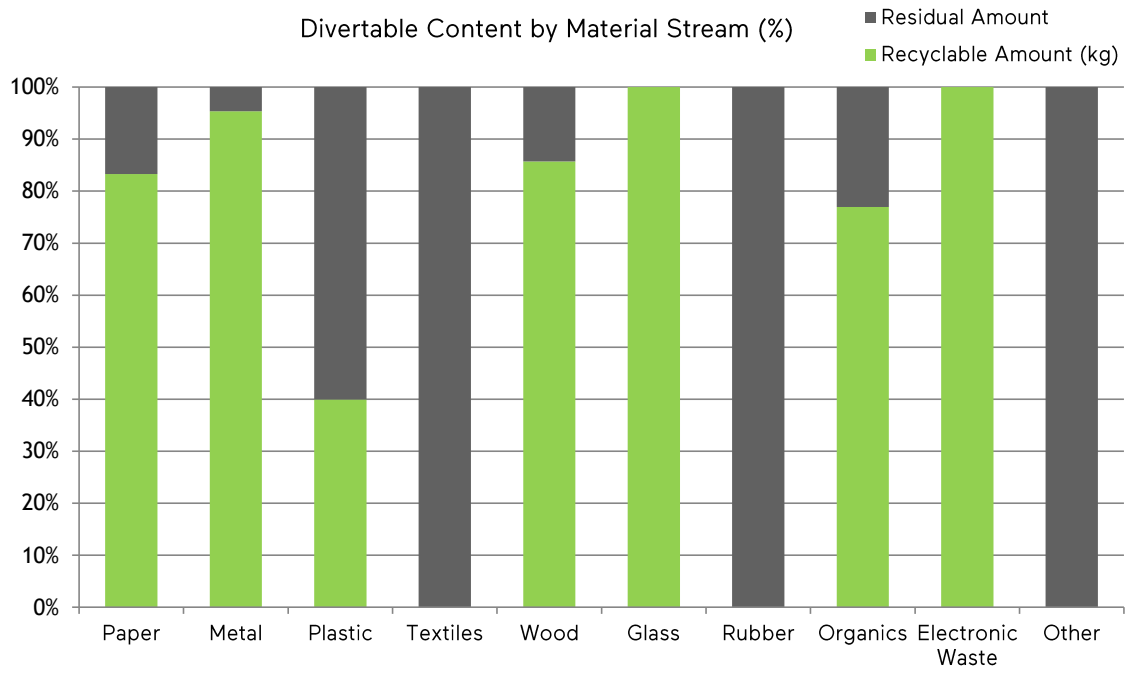
Diversion rate is calculated as follows:

$$\textbf{Diversion Rate} = \frac{\text{Weight of recovered material}}{\text{Total weight of material generated on-site.}} \times 100\%$$

The current diversion rate at the facility is 39.4%. Based on the diversion program currently in place, 64.6% of the material generated at the facility is recyclable or divertible. Therefore, there is room for improvement within the diversion program where most employees in the facility handle their waste.

Figure 4 outlines the material in each category which could potentially be diverted.

Figure 4 - Diversion Opportunity by Material Category



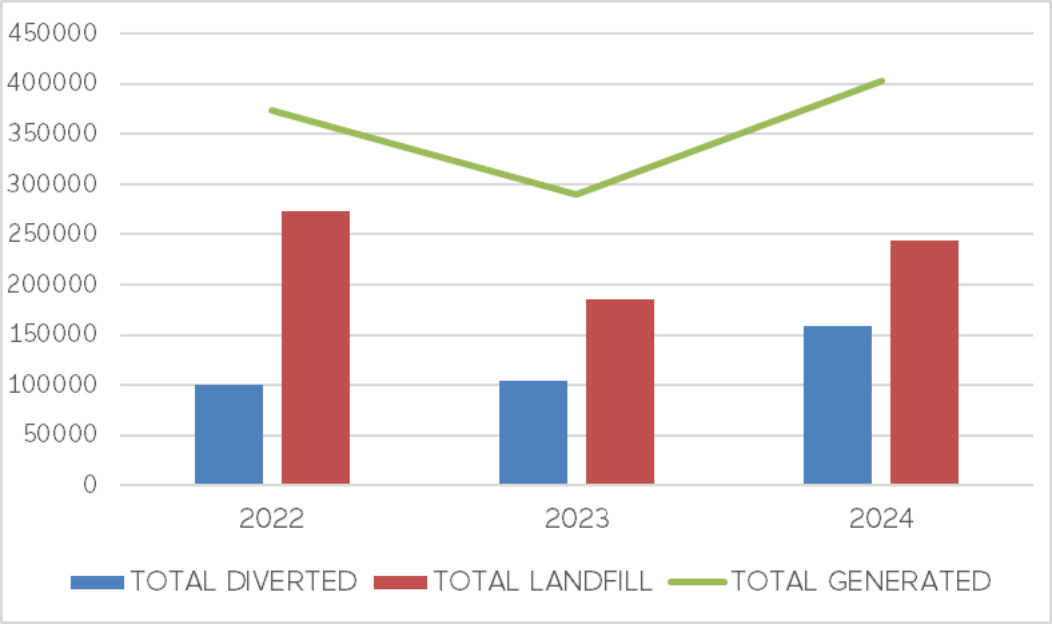
Year Over Year Audit Comparison

An assessment was completed at the facility in 2023 and it was determined that the diversion rate has increased at 35.9% compared to the current assessment of 39.4%.

The facility has seen substantial increase in their total material generation over this period. Most significantly the facility increased the amount of landfill generated. The facility generated 185.92 MT of landfill waste in 2023, compared to the current 243.62 MT.

The facility captured 158.67 MT of material for diversion (recycling, reuse, or organics) in the current assessment compared to 104.03 MT in 2023.

Figure 5 – Comparison of 2022 to 2024 results



Diverted Material Comparison by Category

This following table displays a breakdown of assessed diverted, recycled, reused, and composted materials. The facility currently has programs in place to capture the following waste streams:

Table 6 – Facility Service Information

Diversion Program	Service Provider/s	Container Type	Note
Cardboard	WM	6-yard bin	-
Single Stream	WM	8-yard bin	
Confidential Paper Shredding			Service information not available at time of assessment.
Organics	WM	15, 35 gal totes	
E-Waste		Boxes	Service information not available at time of assessment.
Batteries	-	In place	Service information not available at time of assessment.
Scrap Metals		As needed	
Scrap Wood		As needed	
Light Bulbs			Service information not available at time of assessment.
Toner, Ink Cartridges			Service information not available at time of assessment.
Construction & Demolition		As needed	

Landfill at the facility was collected in 2x 8-yard bins and a 40-yard open top.

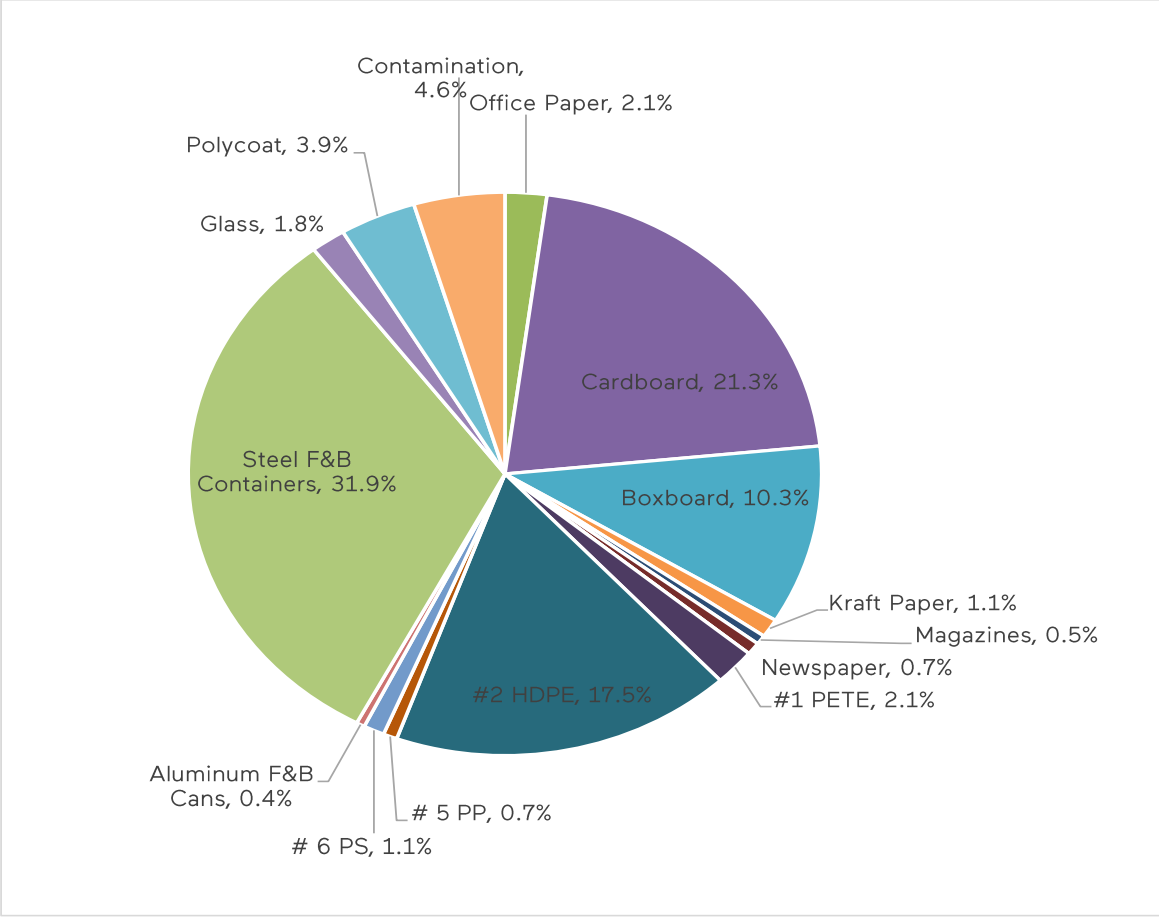
Table 7 – Diverted Material Comparison

Diverted Material	Annual Projected Volume (kg)	Percentage of all Diverted Materials (%)
Mixed Recycling	71,960	45.4%
Organics	67,430	42.5%
Cardboard	19,278	12.1%
Total	**158,668**	**100.0%**

Contamination Identified in Recycling Stream

A sample of the materials collected for the recycling and compost programs was reviewed during the assessment. It was determined that approximately 4.6% of the sample was various forms of contamination. This included excess food and liquids, paper towel, paper cups, and LDPE plastic wrap identified in the recycling bags.

Figure 6 – Breakdown of Audited Material Collected for Recycling and Compost



The **capture rate** indicates the percentage of a material (i.e., office paper, organics) that is being disposed of via one of the sites recovery programs (i.e., single stream, mixed recycling, organics). A 100% capture rate indicates that all recoverable materials being produced on-site has been placed in the correct receptacle and the landfill garbage contains no recoverable materials.

$$\text{Capture Rate} = \frac{\text{Recovered material (e.g. paper in mixed recycling)}}{\text{Recovered material (e.g. paper in mixed recycling)} + \text{Waste material (e.g. paper in garbage)}} \times 100\%$$

Based on the assessment findings, of the 402,288 kg of material generated at the facility in the last 12 months, 259,941 kg of that material is potentially divertible in the available diversion programs. As 158,668 kg of material was captured for recycling or compost, the facility wide capture rate was determined to be 61.0%. Table 8 below outlines the capture rate per material.

Table 8 – Capture Rate Calculations by Material

Diverted Material	Total Generated (kg)	Captured for Diversion (kg)	Landfilled (kg)	Capture Rate (%)
Aluminum food and beverage cans	1,293	321	971	24.9%
Cardboard	37,010	35,341	1,670	95.5%
Fine paper	2,851	1,606	1,244	56.3%
Glass food and beverage bottles/jars	1,499	1,339	161	89.3%
Newsprint	1,065	535	530	50.3%
Steel food and beverage cans	24,110	24,094	16	99.9%
PET (#1) plastic	3,418	1,579	1,838	46.2%
HDPE (#2)	15,098	13,171	1,927	87.2%
LDPE (#4) plastic film	15,735	-	15,735	0.0%
PP (#5) plastic containers	6,283	535	5,748	8.5%
Polystyrene (#6)	8,574	803	7,771	9.4%
Organics	98,787	67,430	31,357	68.3%
Boxboard	13,150	7,764	5,387	59.0%
Glossy magazines, catalogues, flyers	546	402	145	73.5%
Wood	169	-	169	0.0%
Steel	8	-	8	0.0%
Paper towels	44,572	-	44,572	0.0%
Printer cartridges	96	-	96	0.0%
Furniture	3,035	-	3,035	0.0%
Building/renovation material	1,156	-	1,156	0.0%
Disposable food packaging (incl. polycoat)	14,361	3,748	10,613	26.1%
Diapers	54,228	-	54,228	0.0%
Clothing/textiles	4,271	-	4,271	0.0%
Other: Medical bedding, gowns, wraps, etc. Significant liquids, etc.	50,974	-	50,974	0.0%

Recommendations Overview

Five options have been identified that can help Unity Health Toronto - Providence Healthcare make its operations more sustainable. Each option should be carefully reviewed for operational, financial, social, and strategic fit.

- **Increase Awareness of Current Diversion Programs**
- **Employee, Contractor, and Visitor Education and Engagement**
- **Ensure Effective Diversion Infrastructure**
- **Organization Wide Guidelines and Labelling**
- **Continual Improvement and Additional Recommendations**

Photographs 1 to 2 – Collection Receptacle Examples in Facility

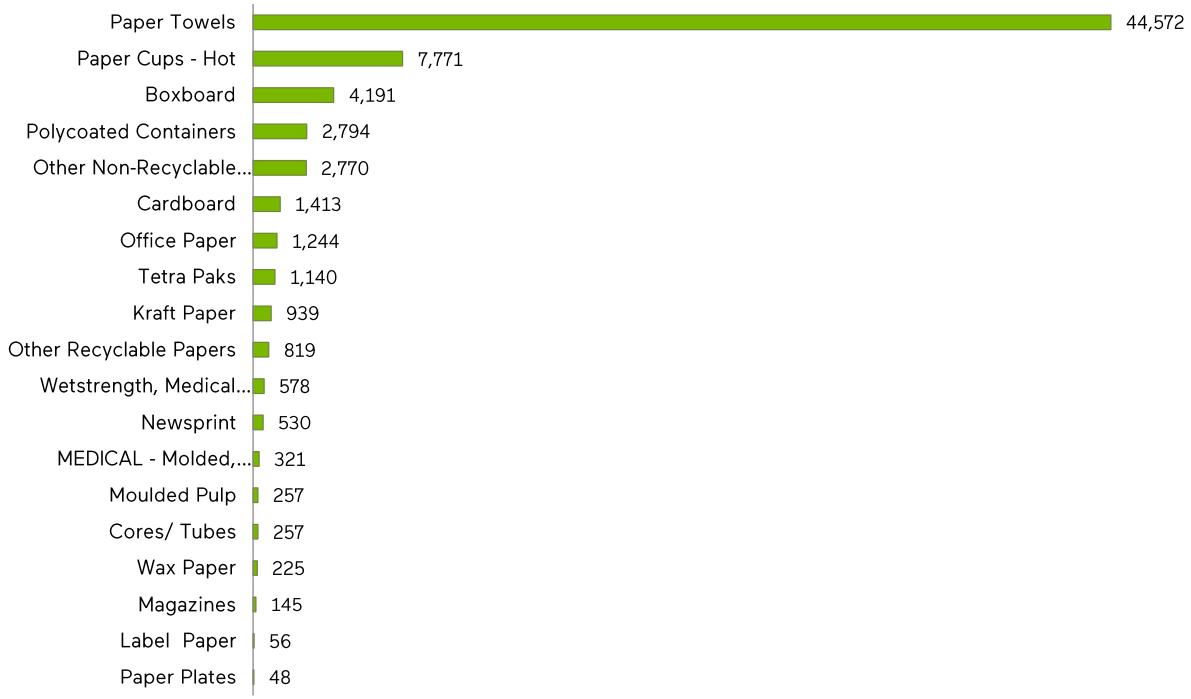
Landfill Sample Material Category Breakdown

Increase Awareness of Current Diversion Programs:
Below is a breakdown of the composition of the audited landfill material generated on site based on the analysis of the audited sample. As well as recommendations for selected sub-category material types.

Papers

Paper materials sent to landfill accounted for 28.8% of your total waste; nearly 70,069 kg of paper will be sent to landfill annually. The facility currently has programs in place to capture cardboard, confidential shredding and mixed paper for recycling.

Figure 7 - Annual Papers Disposed in Landfill (in kg)



Paper towel represented 18.3% of the landfill waste sample. This subcategory includes hand towels, facial tissue, and similar materials. Much of these materials were generated in the washroom and patient areas. The facility should consider providing alternatives including hand dryers to reduce these materials in washrooms. The facility should review hand dryer options that best suit their facility as the payback of the capital costs are often seen in reasonable time frames through reduced landfill costs and the reduction in costs of purchasing new paper towel products.

Paper towel is typically accepted in organic collection programs and could be included in the program already in place at the facility in certain areas.

Paper cups accounted for 3.2% of the audited landfill sample. This included lined hot beverage cups. These materials are not accepted in mixed recycling in this jurisdiction. The facility should promote the use of reusable mugs and containers to its staff.

Boxboard (e.g., tissue or nitrile glove boxes) accounted for 1.7% of the landfill sample. These materials are accepted in the existing mixed recycling program. Examples should be included on educational signage to increase awareness.

Polycoated containers included 1.1% of the landfill sample. This included milk cartons. Education and signage should include these materials to increase awareness that they are recyclable.

Other non-recyclable papers include wax paper and soiled food packaging. This material subcategory accounted for 1.1% of the disposal weight.

Cardboard accounted for 0.6% of the landfill sample. The facility should encourage staff to separate these materials throughout their workday and collect then place for collection.

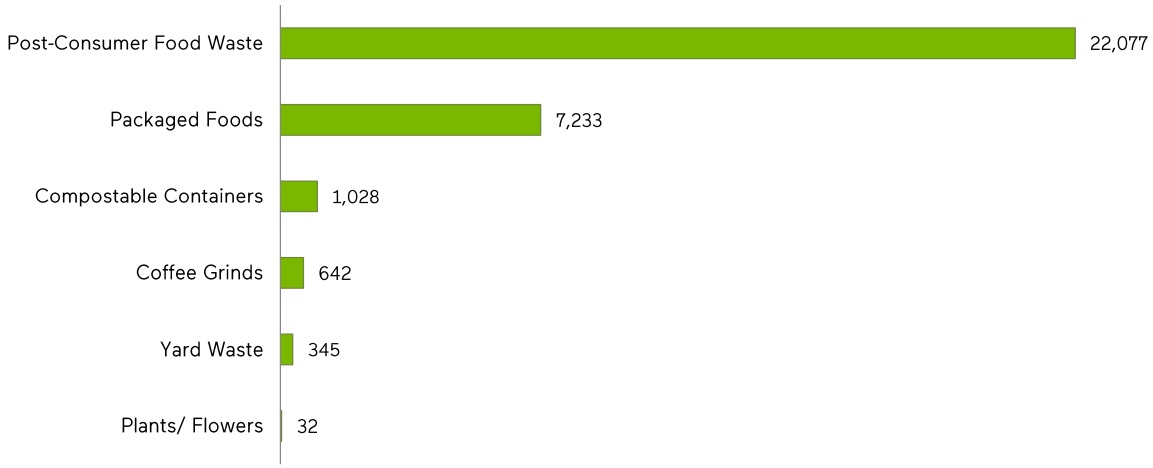
Office paper represented 0.5% of all landfilled materials audited. Continued education for employees should be provided to ensure awareness of current programs and recycling opportunities. Receptacles should be accessible where these materials are generated such as office and nurse stations.

Photographs 3 to 6 – Paper Material Examples in Landfill Sample
(Polycoat containers, paper towel, office paper, paper cups)

Organics

Organic materials sent to landfill accounted for 12.9% of your total waste; nearly 31,357 kg of organics will be sent to landfill annually. A program currently exists at the facility to capture organic materials for compost.

Figure 8 - Annual Organics Disposed in Landfill (in kg)



Organic material was identified primarily as **post-consumer food waste** which represented 9.1% of the entire landfill waste stream. **Packaged foods** included pre-purchased food and represented 3.0% of the audited landfill sample. **Compostable containers** represented 0.4%.

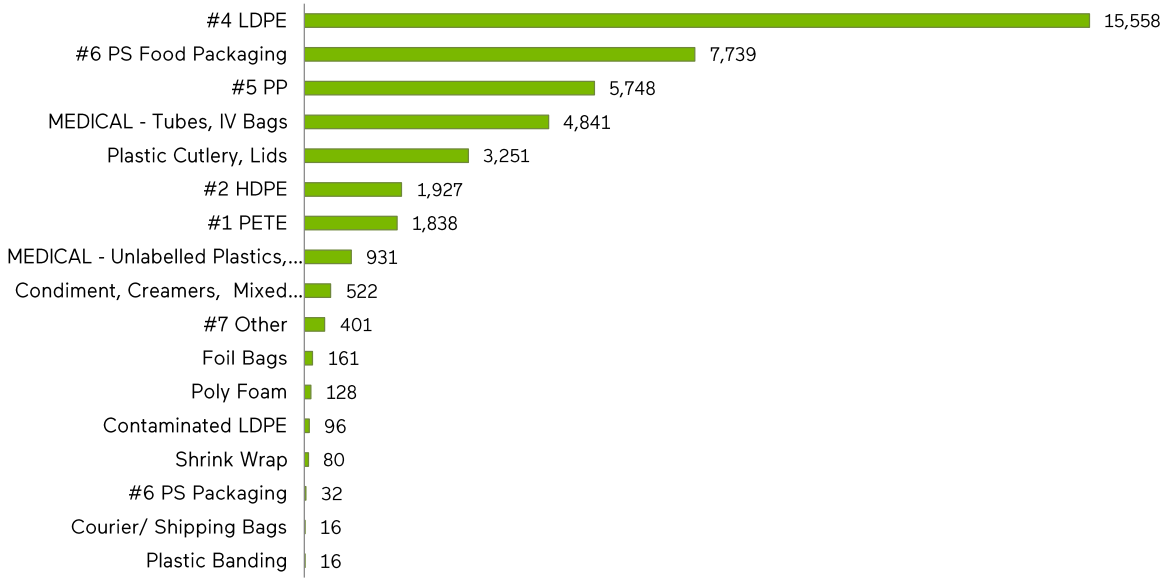
All the material categories above could be diverted from landfill through the organics collection program in place.

Photograph 7 – Organic Material Examples in Landfill Sample (Food waste)

Plastics

Plastic materials account for 17.8% of your waste stream composition; 43,286 kg of plastic materials will be sent to landfill this year from your facility The facility currently has programs in place to capture bottles and containers plastics #1-7. Plastic is generally not a heavy material, therefore the weight generated indicates a significant volume of material. Utilizing current recycling programs will ensure this material is diverted. Most commonly, recycling programs will exist for #1, #2 & #5 containers. Limited recycling programs exist for #3, #4 and #6 plastics due to limited end market demand. The facility currently has programs in place to capture mixed recycling throughout the facility.

Figure 9 - Annual Plastics Disposed in Landfill (in kg)



#4 LDPE film bags & packaging accounted for 6.4% of landfilled materials when combined. At this time, LDPE and soft plastic materials are not accepted in mixed recycling programs.

PS#6 representing 3.2% overall, this most often included food packaging, take out containers, (excluding Styrofoam). If clean, these are often accepted as part of mixed recycling programs.

PP #5 accounted for 2.4% of the landfill sample. Fast food beverage, yogurt, food containers are the most common sources of #5. Users should be aware that these products are recyclable, examples of these materials should be included in educational signage.

Plastic cutlery and lids accounted for 1.3% of the audited sample. These materials are not recyclable in mixed recycling programs. Reusable items should be encouraged where possible.

HDPE#2 represented 0.8% of the landfill waste stream. Cleaning containers, food containers are the most common sources of #2 HDPE. These are commonly accepted in mixed recycling programs. HDPE #2 examples should be included in educational signage.

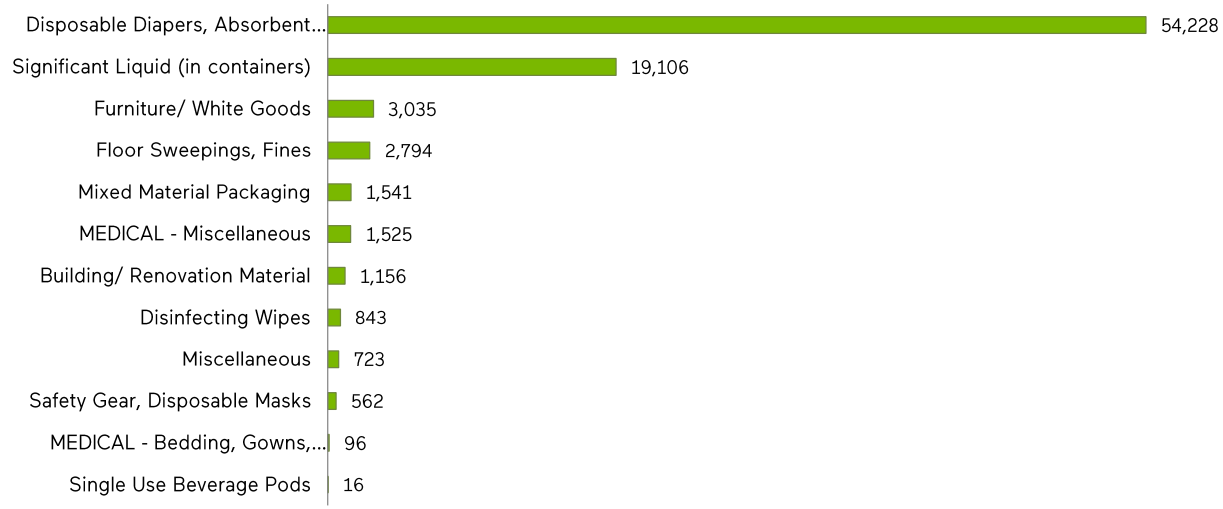
PETE#1 plastic materials represented 0.8% of the landfill sample. Water, juice, and beverage containers are the most common sources of #1 PETE. Most users are aware that these types of products are recyclable, but these items are being found in the waste stream. Examples of these materials should be included in educational signage.

Photographs 8 to 11 – Plastic Material Examples in Landfill Sample (#5PP, #2 HDPE, #6 PS)

Other Materials

Other materials sent to landfill accounted for 35.1% of your total waste; nearly 85,625 kg of this category of material will be sent to the landfill annually. Currently, there are no programs in place to capture most of these materials from the landfill.

Figure 10 - Annual Other Disposed in Landfill (in kg)



Disposable diapers, absorbent pads represented 22.3% of the landfill sample. Currently, no programs are available to divert this material.

Significant liquids represented 7.8% of the facility's disposal weight. Commonly this category includes soaps, water and coffee and other beverages which were most often unfinished in their original containers. Staff may be encouraged to empty containers to ensure the container is captured for recycling.

Also identified in large quantities was **furniture** which included broken, office desks and chairs accounting for 1.2% of the audited sample. This category will also fluctuate due to the needs of employees.

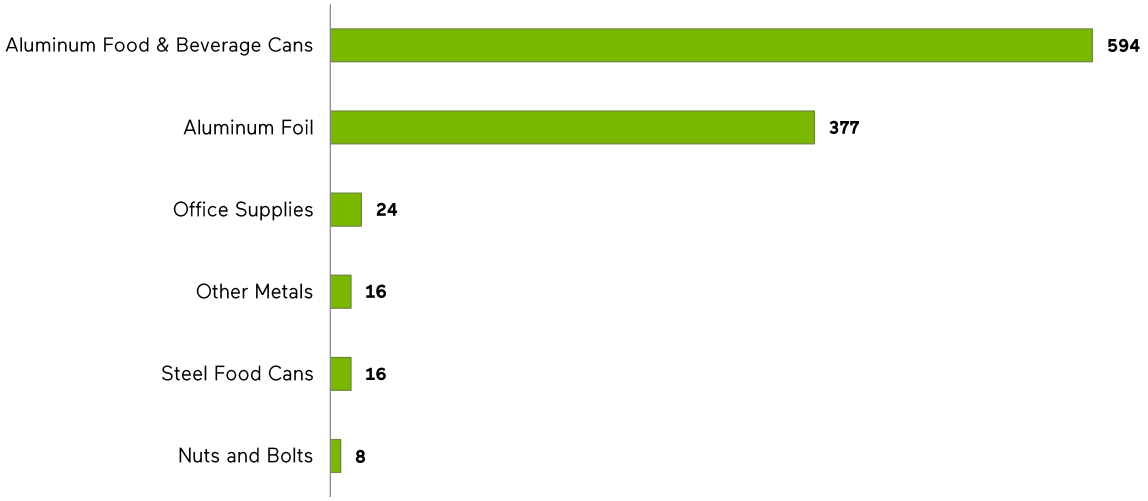
Floor sweepings included a vacuum bag and accounted for 1.1% of the audited sample. These are not recyclable.

Photographs 12 to 13 – Other Material Examples in Landfill Sample (Construction and demo. materials, safety masks)

Metals

Metal materials sent to landfill accounted for 0.4% of your total waste; nearly 1,036 kg of metals will be sent to landfill annually. The facility has programs in place to capture most metal food and beverage containers in the mixed recycling program.

Figure 11 - Annual Metals Disposed in Landfill (in kg)



Aluminum food and beverage cans were present at 0.2% of the sample. These are recyclable materials and could be accepted in mixed recycling programs. Clearly labeled and easily accessible recycling receptacles are key to ensure that employees and visitors can participate and separate materials where generated.

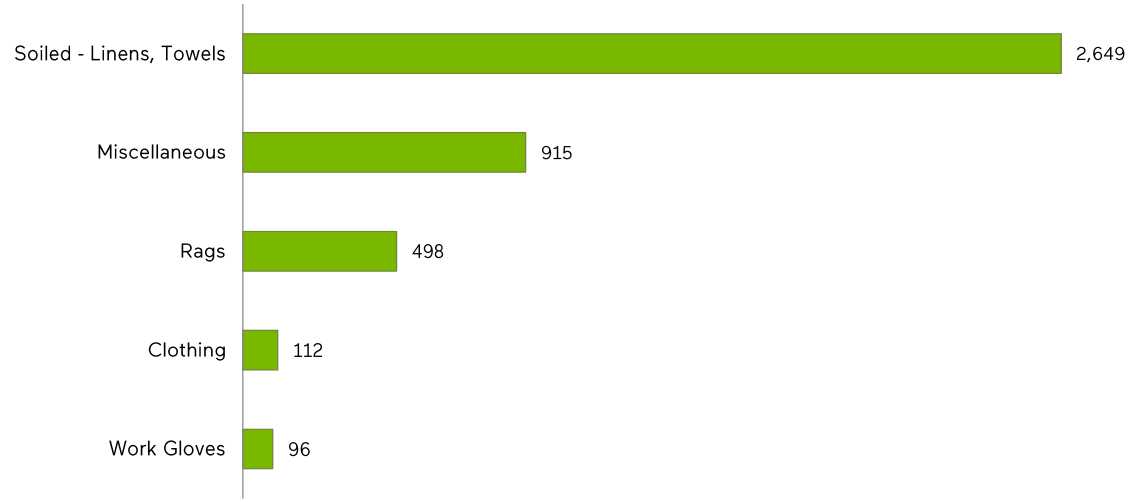
Aluminum foil 0.2% of the audited sample. If clean, it could be captured in the facility's mixed recycling program. These items are not recyclable in the current program.

Photographs 14 to 15 – Metal Material Examples in Landfill Sample (Aluminum foil, aluminum cans)

Textiles

Textile materials sent to landfill accounted for 1.8% of your total waste; nearly 4,271 kg of textiles will be sent to landfill annually. There is currently no program in place to capture these materials.

Figure 12 - Annual Textiles Disposed in Landfill (in kg)



Textiles identified in the landfill waste stream are not currently recyclable.

Soiled Linens, Towels accounted for 1.1% of the landfill sample. These are not recyclable; employees should be sure to fully use all resources prior to disposal.

The facility should review opportunities to provide reusable towels and set up a program to capture and reuse or repurpose gloves where possible through their uniform suppler.

Photograph 16 – Textile Material Examples in Landfill Sample (Clothing)

Rubber

Rubber materials sent to landfill accounted for 3.0% of your total waste; nearly 7,423 kg of rubber will be sent to landfill annually. There are currently no programs in place to capture these items.

Figure 13 - Annual Rubber Disposed in Landfill (in kg)

Nitrile work gloves accounted for 3.0% of the landfill sample. These are not accepted in mixed recycling programs. The facility should consider implementing a targeted program from a supplier such as a Terracycle or Go Zero. These vendors can offer programs for diverting unique materials not typically recycled.

Government of Canada Actions on Plastic Waste

With the consistent growth in plastic pollution and associated carbon emissions, the Government of Canada has made robust commitments to address the developing problem of plastic use. The *'Single-Use Plastics Prohibition Regulation'* (SUPPR) is a part of the Government of Canada's plan to support the concerns of pollution and GHG emissions, meeting a target of zero plastic waste by 2030.

Materials such as, single-use plastic checkout bags, ring carriers, foodservice ware, stir sticks, and straws will be prohibited from manufacture, import, and sale within Canada. The government has set explicit targets and commitments including plastic waste diversion, reducing single use materials, and procuring sustainable plastic products.

Table 8: Goals to Reduce or Divert Plastics

Goal and Commitment	Facility Participation	Facility Recommendations
Increase Plastic Waste Diversion:	Container recycling collection is in place.	▪ Increase capture rates in existing programs through education. ▪ Consider local procurement to reduce shipping materials. ▪ Implementation of additional diversion program for limited materials.
Reduce Single-Use Plastics in Operations, Meetings and Events:	Currently, there are minimal in-person events and meetings. Most kitchens are equipped with reusable dishes that can be washed and reused, as observed on site tour.	▪ Ensure all kitchens are equipped with reusable cutlery and assess options for sanitizing dishwashing systems. ▪ Discourage single-use beverage pods and offer refillable pods as an alternative. ▪ Reduce foil packaging by encouraging employees to participate in 'waste-free lunches.'
Procure Sustainable Plastics:	When procuring products that contain plastics, promote the procurement of sustainable products and the reduction of associated plastic packaging waste.	▪ Ensure all operational plastics are accepted into the current recycling program. ▪ Seek local procurement to avoid shipping material. ▪ Source procurement options with minimal packaging.

A considerable amount of the single-use plastics identified in the waste assessment were related to takeout food. This included plastic cutlery, hard to recycle food packaging, stir sticks, and straws. Once implemented, the facility should complete a waste assessment to determine progress and opportunities for future waste diversion programs.

Employee, Contractor, and Visitor Education and Engagement

The success of a diversion program is driven by user participation. If those who generated the waste are not utilizing diversion programs, success will never be achieved as it is not enough to simply implement programs and expect those programs to be effective. There are two critical factors necessary to ensure that diversion programs are effective. These factors are education and engagement.

As many different stakeholders are involved and contribute to the waste and diversion program it is important to target education towards each group.

1. Communication Program - The facility could maintain a communication program to communicate to educate all stakeholders. The following are all methods that can ensure stakeholders understand the steps that are being taken to achieve environmental sustainability within the facility and feel included in its successes.

   Promotion - The facility could use internal communication such as newsletters, internal emails, and educational boards to relay their message. As well as Earth Day or Environment Days to promote the diversion program through promotional materials or information booths; Waste Reduction Week in October is another opportunity for communication around waste reduction.

   As well, the facility could create a **slogan or branding** to help promote their diversion program and create continuity for all promotional or educational materials.

   Information can be tailored to reflect the findings of this assessment. For example, create a campaign to encourage employees to take a moment to put their mixed paper in the correct receptacle, no matter where they are on site.

   Green information boards, similar to health and safety boards, can be a centralized place for relevant environmental information and reference material, example below.

Below is an example of colour coded pictorial signage. Each provider should be able to provide similar material to educate stakeholders.

2. Training - Regular training of employees, custodial staff and contractors on diversion procedures help demonstrate the facility's commitment to diversion programs, update staff on policy changes and account for changes in workforce. Regular training has also been shown to aid in the elimination of inconsistency and complacency in diversion programs.
    - Training can be provided with power point presentations and examples of educational signage and recyclable materials.
    - Training can be just a few minutes during safety talks or weekly check-ins.
    - Ongoing training and education are critical due to turnover of employees and contractors as well as occasional program changes.
    - Management and supervisors could be trained on all aspects of the diversion program which will allow them to be an ambassador and a resource to support employees and visitors.

3. Maintenance/ Custodial Review – Facility management could regularly meet with the custodial manager and maintenance staff (custodians) as they may be able to provide hands on insight into aspects of the diversion program and areas of improvement.

    Custodial staff should be trained on the diversion program during their orientation and reminded on a regular basis by their managers. Input from custodians and custodial managers may prove beneficial as they have firsthand knowledge of the program.

Site Observations - It was identified throughout the assessment that there were inconsistencies in the types of receptacles used, location of receptacles and the availability of labelling; signage etc. The facility could strive to use a similar style of receptacles throughout the facility and ensure that all receptacles and collection bins are appropriately labelled.

- Facility organic and waste bins located in the exterior of the building. Black organic totes within the right picture are subcontracted through Planet Earth.

- It is recommended that the facility look to implement more comprehensive signage and labeling on all receptacles located both inside and outside of the building. As seen in the pictures below the waste and recycling bins found throughout the building had minimal signage for employees to follow.

Ensure Effective Diversion Infrastructure

The infrastructure of a diversion program, including the receptacles and education materials, play an integral role in its success. If containers are not present, or accessible to collect recyclable material, users will not be able to participate.

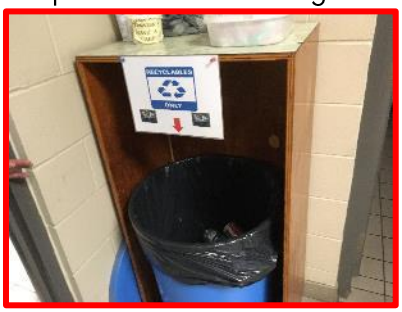
- Facility Managers should, as part of their duties, routinely tour the facilities to monitor the infrastructure. By ensuring recycling stations are available, clean, and orderly. This will aid in their effectiveness. This will also ensure that receptacles, equipped with labelling and signage, are in place for ease of use by employees, contractors, and visitors.
- Recycling receptacles should be accessible and the largest receptacles and the most available in terms of numbers.
    - As described in this report, most of the materials generated at the facility are recyclable; therefore, waste receptacles should be less prominent to encourage the use of the recycling receptacles.

- Apply a colour coding system (e.g., blue receptacles and blue labelling for mixed recycling) will help users recognize the recycling containers in different areas of the facility.

- Receptacles should be labeled (e.g., stickers, printing labels, posters, magnets) to identify what stream they are intended to collect.
    - This is a straightforward way to update current receptacles without the capital costs of new containers.

- Pictures, with simple easily recognizable images, should be used to indicate recyclable materials to those not familiar with the language or for young readers.

- Recycling receptacles should never be lined with black bags, as they may be confused for landfill and misplaced, during disposal; It should be requested that the maintenance team use clear bags to collect recyclables to ensure that recyclable or compostable materials are directed to the correct receptacle. Different bags are not as easily confused in carts.



- Promotional materials help educate and increase awareness in the necessity of the 3 Rs.

Organization Wide Guidelines and Labelling

Recycling receptacles identified during the site visit were often not labeled and not equipped with guidelines to help staff or visitors understand which specific materials they can recycle.

It is recommended that the facility develop educational signage and receptacle labelling to help facilitate the diversion program. Ideally the program designed is developed and approved by top managers. This approach will ensure that a consistent standard is applied and could increase buy-in throughout the organization.

Such a program could include:

- Reference posters, indicating a list of acceptable recyclable materials common at stores. For back of house and common spaces such as breakrooms;
- Labels directly for receptacles and collection bins, indicating what they are designated to collect;
- Educational/motivational materials, including companywide slogans, branding, and imagery may be applied;
- Applying a colour coding system (e.g., blue receptacles/ labelling for bottles and cans) will significantly aid users in disposing of their waste easily and understanding what goes where;

Where necessary the program should set out a recommended set up procedure, including photo examples, to advise each department how to best set up infrastructure.

It is recommended that:

- Older receptacles may be updated with labels (e.g., stickers, printing labels, posters, magnets) to remain consistent and effective, saving capital costs purchasing new receptacles;
- Pictorial recycling guidelines should be available at all recycling stations (posted on the wall or receptacles) providing recyclable examples and where appropriate, 'non-acceptable' materials; simple, easily recognizable images should be used to educate user and convey the message to those less familiar with English;
- Reference signage outlining all diversion programs should be placed on employee health and safety boards and in back-of-house areas, with a longer list of all the materials generated on site;
- Simple terms and bright colours are used as they are most effective to draw attention;

✓ **Colour coded pictorial signage and receptacles**
✓ **Labels used to update older receptacles**

Continual Improvement and Additional Recommendations

The following are suggested actions to help the facility improve their internal processes and strive to reach higher diversion rates while maintaining a strong, efficient diversion program.

It is recommended that the facility regularly check with their waste hauler to confirm what materials are recyclable in their jurisdiction. As some of these materials may be integral to the operations of the facility, it is recommended that you regularly review opportunities to reduce or substitute these materials in your operations.

i. Contamination in Recycling Sample

Some non-recyclable materials were identified within the recycling and compost samples. This included a significant amount of liquids, food, polyfoam, paper towel, paper cup and LDPE plastic wrap in recycling bags. Based on the assessment about 4.6% of the of the mixed recycling sample could be considered contamination.

Education and awareness should be provided to ensure employees know that these materials may contaminate the recycling and compost streams and, in some instances, force the material to be sent to landfill, thus wasting the efforts of others who made efforts to recycle. It is recommended that recycling receptacles be equipped with labelling reminding users that garbage is not accepted here.

ii. Capture Additional Materials

Some non-traditional recyclable materials were identified in the landfill waste sample. This included nitrile gloves and safety gear. Programs are available from companies like TerraCycle or Go Zero in to provide the resources to set up a collection station at your facility.

https://www.terracycle.ca/en-CA/brigades/writing-instrument-retail-based-brigade

https://gozerorecycle.com/pages/recyclingboxes

Example of Go Zero collection box

In addition, TerraCycle or Go Zero offer other recycling programs for common non-conventional materials which were identified during the audit. These include single use beverage pods, creamer containers and plastic wrappers.

iii. Sustainability Goal Setting

It is recommended that the facility set specific diversion **goals** regarding their waste management program.

- Goals must be accompanied by a target date and progress reviewed at least once per year to maintain effectiveness.
- Through the process of goal setting, there is inherent motivation to meet those goals and it is believed that organizations who establish goals publicly are more likely to act with pressure from those who would like to see these goals met. Waste disposal represents a significant cost to the facility and all efforts to reduce disposal cost are beneficial.
- Managers and personnel may change but once the momentum is started and goals are set, new staff will be motivated to see projects through.

iv. Material Substitutions: Paper Towel

When considering environmental and financial costs of paper towel manufacturing and disposal, alternatives such as High-Speed Energy Efficient (HSEE) hand dryers would be a favourable option for the facility.

a) The **environmental factor**: In comparing the carbon footprint of paper towel and hand dryers, material production, manufacturing, transportation, material use, and its end of life are considered. The carbon footprint for an HSEE hand dryers is estimated to be less than one third of paper towel even if produced from recycled materials.
b) The **cost factor**: Paper towel use involves continuous costs: purchasing, handling (custodial operations), and disposal (both composting and landfilling have costs associated). The initial capital cost of hand dryers begins to see a payback within a reasonable timeframe.
c) The **hygiene factor**: Paper towels are typically determined to be more hygienically effective in comparison to hand dryers as the hands dry more quickly. However, this can be mitigated with measures such as ensuring antibacterial soaps and guidelines of drying length on hand dryers. There is no research connecting use of hand dyers to infection. The research suggests that thorough handwashing will not lead to the spread of bacteria with use of hand dryers.

Waste Management Sustainability Services
2024 Recycling Benefits for Unity Health Toronto

In 2024, we recycled 63 tons of Cardboard, Plastic, Aluminum, Glass, and Paper

These recycling efforts conserved the following resources/prevented these emissions:

1,060 Mature Trees
Represents enough saved timber resources to produce 18,020,000 sheets of printing and copy paper!

158 Cubic Yards of Landfill Airspace
Enough airspace to fulfill the annual municipal waste disposal needs for 183 people!

144,630 Kw-Hrs of Electricity
Enough power to fulfill the annual electricity needs of 13 homes!

Avoided 159 Metric Tons (MTCO2E) of GHG Emissions
That GHG reduction is equivalent to removing annual emissions from 33 passenger vehicles!

257,131 Gallons of Water
Represents enough saved water to meet the daily fresh water needs of 3,428 people!

Sources: U.S. Environmental Protection Agency, U.S. Energy Information Administration, Environmental Paper Network-Paper Calculator V4.0, Domtar Paper, Gaylord Corporation, U.S. Forest Products Laboratory, and Waste Management.
Notes: GHG = Greenhouse Gas; MTCO2E = Metric Tons of Carbon Dioxide Equivalent

Appendix 2 - Detailed Waste Breakdown by Generation Area

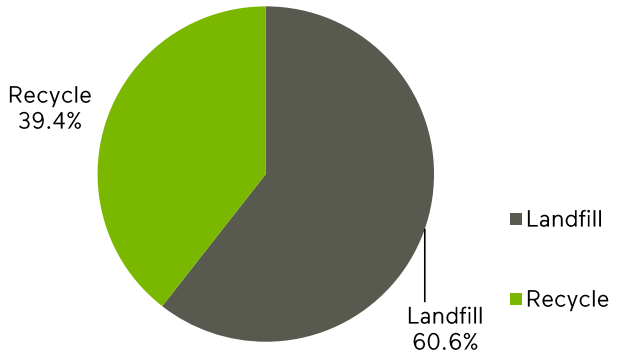
Area	Paper	Metal	Plastic	Textile	Wood	Glass	Rubber	Organic	Electric	Other	Total
HOSPITAL	62.44	0.36	21.19	3.77	0.06	0.00	6.26	13.99	0.25	52.84	**161.16**
LONG TERM	13.03	0.22	10.83	1.14	0.01	0.00	2.97	2.52	0.02	35.40	**66.14**
KITCHEN	8.67	0.64	21.03	0.40	0.13	0.20	0.02	21.12	0.00	12.38	**64.59**
ADMIN. / OFFICE	3.14	0.07	0.87	0.01	0.01	0.00	0.00	1.04	0.01	0.82	**5.97**
LOOSE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39	0.00	5.22	**5.61**
Grand Total	**87.28**	**1.29**	**53.92**	**5.32**	**0.21**	**0.20**	**9.25**	**39.06**	**0.28**	**106.66**	**303.47**

Appendix 3 – Diversion Report

Diversion Overview
Unity Health Toronto - Providence Healthcare, Scarborough Ontario

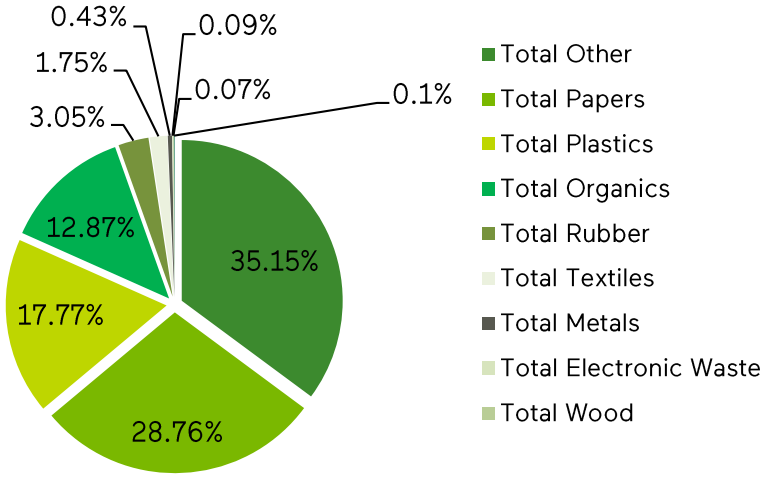
Diverted Materials	Annual Projected Volume (kg)	% Of Diverted Materials
Mixed Recycling	71,960	45.4%
Organics	67,430	42.5%
Cardboard	19,278	12.1%
Total	**158,668**	**100.0%**

Diversion Summary



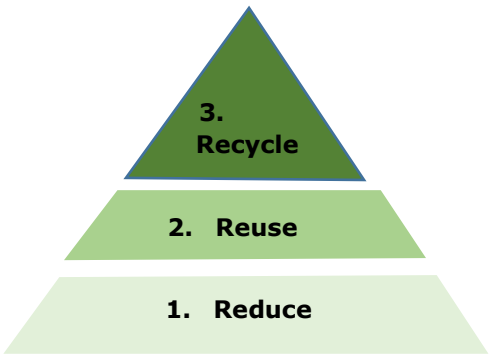
Waste Category	Material Composition (%)	Annual Projected Volume (kg)
Total Other	35.1%	85,625
Total Papers	28.8%	70,069
Total Plastics	17.8%	43,286
Total Organics	12.9%	31,357
Total Rubber	3.0%	7,423
Total Textiles	1.8%	4,271
Total Metals	0.4%	1,036
Total Electronic Waste	0.1%	225
Total Wood	0.1%	169
Total Glass	0.1%	161
Total	**100.0%**	**243,620**

Waste Material By Category



Appendix 4 – Three R's Waste Hierarchy

The three R's waste hierarchy gives an order of priority of actions to be taken to reduce the overall amount of waste generated at the site.



Studies indicate that between 2 and 5 percent of waste streams are reusable. There are many ways to prevent waste, at the source, and reuse products to reduce waste, including:

	Material	Reduction Strategies	Reuse Strategies	Recycling Strategies
Papers	**Cardboard / boxboard**	Encourage suppliers to use reusable packaging (e.g., plastic totes) Purchase reusable products	Re-use of cardboard for storage and packaging	Provide enough receptacles, information and signposting for OCC and mixed recycling programs
	Office paper	Encourage use of electronic communications Encourage tenants to print two sided	Encourage one sided printed paper for scrap paper Creation of scrap pads Utilize centralized notice boards	
	Paper towels	Install hand-dryers in washrooms and dish cloths in kitchens		
	Newsprint / Magazines	Provide communal newspapers in break out areas and spaces	Encourage staff to share magazines and newspapers Donate used magazines and newsprint Use newsprint for packaging materials	
	Paper cups	Place reusable coffee cups in kitchen areas Encourage users to bring reusable coffee cups Incentivize the use of own cups (discounts, loyalty cards)	Provide coffee making facilities in kitchens and encourage users to refill reusable coffee cups	Encourage tenants to use compostable and recycling coffee cups which are accepted in organics/mixed recycling programs
Plastics	**PETE**	Encourage building users to bring reusable water bottles Ensure sufficient water fountains for building users	Encourage building users to reuse plastic bottles Use refundable recycling schemes at the site	Provide enough receptacles, information, and signposting for mixed
	HDPE	Encourage bulk buying of goods to reduce volume of packaging		

		Purchase products with minimal packaging		recycling programs
	LDPE	Train custodial staff to empty individual waste receptacles into single black garbage bag		
	Polystyrene	Develop procurement policies which require on-site retailers to use compostable and recyclable packaging and cutlery		
	Organics	Set up partnerships and donation programs with local charities		Implement organics program
Containers	**Beverage Cans**	Encourage use of drinks dispensers at food courts and in kitchens	Use refundable recycling schemes at the site	Provide enough receptacles, information, and signposting for mixed recycling programs
	Glass Bottles/Jars	Encourage use of drinks dispensers at food courts and in kitchens		
	Single Use Beverage Pods	Encourage use alternative coffee making facilities (i.e., filter coffee, pod free coffee machines)	Use reusable k-cups	Set up k-cup recycling programs with local supply companies
	Office supplies	Set up communal stationary points in offices for building users	Establish donation programs with local schools	Set up recycling programs with specialist companies such as Teracycle

Appendix 5 – Material Descriptions

Material	General Descriptions	Waste Stream
#1 PETE	Polyethylene Terephthalate, Water Bottles, Soft Drink Bottles	Recycle
#2 HDPE	High Density Polyethylene Containers, Chemical Containers or Jugs; High Density Polyethylene Bags or Film, Strong "crispy" Bags	Recycle
#3 PVC	Plastic pipes, Cleaning Supply Jugs, Pool Liners, Sheeting, Twine, Carpet Backing	Landfill
#4 LDPE	Low Density Polyethylene Bags and Film, Garbage Bags, Shopping Bags	Landfill
#5 PP	Poly Propylene, Yogurt Containers, Straws	Recycle
#6 PS	Poly Styrene, Beverage Containers, Packaging Materials, Take-out Food Containers, Packing Popcorn	Recycle
#7 Other	Products Labeled #7, Unlabeled Plastic Items	Landfill
Courier and Shipping Bags	Poly Mailer Bags	Landfill
Misc. Plastics	Plastic Utensils	Landfill
Plastic Cutlery	Plastic Forks, Spoons, Knives, Stirring Sticks	Landfill
Plastic Strapping	Plastic Shipping Straps, Plastic Banding	Landfill
Polycoat	Milk Cartons, Tetra Packs	Recycle
Polyfoam	Foam Protective Packaging Materials, Styrofoam	Landfill
Shrink Wrap	Shrink Wrap, Plastic Film	Landfill
OCC	Old Corrugated Cardboard	Recycle
Boxboard	Cereal, Tissue Box Material	Recycle
Cores and Tubes	Paper-Based Cores and Tubes	Recycle
Kraft Paper	Paper Bags, Heavy Brown Paper	Recycle
Label Paper	Sticker Paper	Landfill
Magazines	Glossy Magazines and Newspapers	Recycle
Napkins	Paper Napkins and Tissues	Organic
Newsprint	Newspapers, Weekly Flyers	Recycle
Molded Pulp	Drink Trays, Egg Cartons, Product Packaging	Recycle
Paper Cups	Paper or Polycoated Cups	Recycle
Paper Plates	Paper Food Plates	Organic
Paper Towels	Paper Hand Towels	Organic
Photo Paper	Glossy Paper	Landfill
Tetra Pak Containers	Juice Boxes, Liquid Beverage Containers	Landfill
Tissue Paper	Thin Packing Paper	Landfill
Wax Paper	Paper for Wrapping or Packaging	Landfill
Wet Strength Paper	Wet Strength Kraft Paper, Medical Paper	Landfill
White/ Ledger/ Office Paper	White Paper, Printer Paper	Recycle
Aerosol Cans	Spray Cans	Recycle

Aluminum	Aluminum Parts and Products	Recycle
Aluminum F & B Cans	Aluminum Food and Beverage Cans, Pop Cans	Recycle
Aluminum Foil / Wrappers	Food Wrappers and Packaging	Landfill
Metal Banding	Metal Straps	Landfill
Misc. Metals	Metal Shavings, Nuts and Bolts, Metal Clothes Hangers, Scrap Metal	Landfill
Paint Cans	Empty Paint Cans	Landfill
Steel	Steel Food Cans, Steel Parts, and Products	Landfill
Coloured Glass	Coloured Beverage Bottles and Jars	Recycle
Clear Glass	Clear Beverage Bottles and Jars	Recycle
Drinking Glass	Glass Cups, Wine Glass	Landfill
Lab, Medical Glass	Flasks, Beaker, Dropper, Measuring Cylinder, Test Tubes, Jars	Landfill
Pallets and Skids	Wooden Pallets and Skids	Landfill / Reuse
Scrap Wood	Construction Materials, Misc. Wood Pieces	Landfill
Wood Shavings	Scrap Construction Shavings and Debris	Organic
Wooden Crates	Shipping Crates	Landfill
Stir or Chop Sticks	Wooden Stir or Chop Sticks	Organic
Batteries	Dry Cell Batteries, Large Batteries	E-Waste
Electronics	Cables, Computer Equipment, Toasters, TVs, Phones, Printers	E-Waste
IT Equipment	IT Visual and Audio Equipment, Wires, Cords	E-Waste
Printer Cartridges	Used Printer or Ink Cartridges	E-Waste
Coffee Grounds	Used Coffee Grounds	Organic
Plants / Flowers / Yard Waste	Indoor and Outdoor Plants, Flowers, Leaves, Yard Waste	Organic
Post-Consumer Waste	Scrap Food Waste	Organic
Pre-Consumer Waste	Food Preparation Waste	Organic
Compostable Containers	Compostable Take-Out Containers, Paper Plates	Organic
Rubber Tubing	Cable Protection, Metal Coverings, Pipe Fittings	Landfill
Nitrile and Latex Gloves	Nitrile and Latex Gloves	Landfill
Rags	Used Rags and Cloths	Landfill
Shoes and Boots	Assorted Footwear	Landfill
Personal Clothing	Used Shirts, Uniforms, Hats	Landfill
Misc. Textiles	Rags, Mop Heads, Cloth Gloves	Landfill
Building Material	Construction Material, Drywall, Insulation	Landfill
Bulbs	CFL, LED, Fluorescent Bulbs and Tubes	Special
Ceramics	Objects Formed with Clay (e.g., Pottery)	Landfill
Cooking Grease	Fats, Oils and Grease	Landfill
Drywall	Regular or White Board Drywall	Landfill
Disposable Diapers	Disposable Diapers	Landfill
Face Coverings	Surgical Masks, Dust Masks, N95 Masks	Landfill
Floor Sweepings	Debris, Dust	Landfill
Furniture	Chairs, Desks, Lamps, Shelves	Landfill

Hygiene Materials	Feminine Hygiene Materials, Disposable Diapers, Cloth Diapers	Landfill
Liquid in Container	Significant Liquid in Bottle, Container or Cup	Landfill
Mixed Material Packaging	Condiment Containers, Envelope with Window, Miscellaneous Product Packaging	Landfill
Air Filters	Furnace Filters, Vehicle Filters	Landfill
Safety Gear	Safety Vests, Jackets, Harness, Safety Toe Covers, Work Gloves	Landfill
Single Use Beverage Pods	K-Cups and Pods	Landfill
Tires	Car Tires, Forklift Tires	Landfill

Appendix 6 – Ontario's 3Rs Regulations

Ontario's 3Rs Regulations

Ontario's 3Rs Regulations governing non-hazardous solid waste from residential, industrial, commercial and institution sources became law in March 1994. Designated IC&I organizations are now required to conduct annual waste audits and update annual waste reduction work plans. This documents overviews the regulatory requirements for IC&I sector organizations.

Regulation	Intent	Requirements	Who Must Comply
Ontario Regulation 102/94 ***Waste Audits*** ***Waste Reduction Work Plans***	To understand the amount and composition of all waste produced, how the waste is produced including relevant management policies and practices, and how the waste is managed A waste reduction work plan seeks to establish concrete goals to reduce waste	Annual waste audit must be completed in which the types of waste and quantities of waste are assessed. A waste reduction work plan must contain a strategy for reducing, reusing and recycling waste, identify who is responsible for implementation and provide a summary of timing and expected results from the waste reduction projects. This plan must be communicated with all employees	• Retail shopping complexes of 10,000+ m^2 floor area • Class A, B or F hospitals under Ontario Reg. 964 • Schools with 350+ students at a location or campus • Restaurants with gross annual sales of $3,000,000+ • Office buildings with 10,000m^2 of floor area • Hotels and motels with 75+ units • Building construction projects of 2,000+ m^2 • Building demolition projects of 2,000+ m^2 • Manufacturing sites with 16,000 employee hours per month
Ontario Regulation 103/94 ***Source Separation Programs***	To promote the source separation of materials throughout the facility	Handling and storage facilities must be provided for recyclable materials. Efforts must be made to ensure the system is used and that source-separated materials are reused or recycled. Employees must be instructed on the use of the program	
Ontario Regulation 104/94 ***Packaging Audits*** ***Packaging Reduction Work Plans***	To examine the impact of packaging on the waste management system and identify waste reduction plans. Packaging refers to all materials used to protect, contain or transport a product.	Bi-annual audit must address; types and quantities of packaging used, reusability or recyclability of packaging, the environmental impact of the waste and the lifecycle of the packaging materials. Reduction work plan must identify ways to reduce packaging used, increase reuse or recyclability content, reduce the environmental impact and reduce the burden of waste for the consumer.	• Manufactures or packagers of packaged food, beverage, paper or chemical products with total employee hours of 16,000+ per month • Importers of packaged food, beverage, paper or chemical products for sale in Ontario with value of goods imported $20,000,000 per year

THINK GREEN.