

***Development of a Regulation for
Packaging, Paper and Packaging-like
Products (PPPP) Under the Resource
Recovery & Circular Economy Act
(RRCEA) and transitioning Blue Box
programs***

DRAFT

Revised April 9, 2020

Disclaimer

The following are draft comments prepared by the Municipal Resource Recovery and Research Collaborative (M3RC) to the Ministry of the Environment, Conservation and Parks (the Ministry), in response to the consultation on transitioning the Blue Box through the creation of a new regulation under the *Resource Recovery and Circular Economy Act, 2016* (RRCEA).

The purpose of the M3RC is to develop and promote policies and programs on behalf of the municipal sector to support the transition to a circular economy. The M3RC provides advice and recommendations to staff and municipal councils for their consideration and action but does not usurp or replace the autonomy of individual municipal governments. These positions do not preclude individual municipal Councils from sharing their own positions with the Ministry.

The M3RC has been providing advice to the sector since 2017. This includes being active in both the mediation process by Special Advisor, David Lindsay, and now in the current consultation on the regulation being held by the Ministry.

The recommendations made by the M3RC were informed by the recommendations made in [Mr. Lindsay's report](#) that were accepted by the Ministry. They also align with the [provincial interests incorporated in the RRCEA](#), and the public policy objectives of the Blue Box mediation process as set out in the [Minister's mandate letter to the Special Advisor](#).

Note that the M3RC recognizes that this is an iterative process and active policy discussion. Given that, this initial input may change as more feedback and information are received. It is also understood that certain areas will need further discussion and refinement in the coming weeks.

DRAFT FOR FEEDBACK

Executive Summary

The M3RC are recommending the following key attributes should be reflected within the regulation:

1. The list of designated materials should ensure a level-playing field for all packaging, paper, and packaging-like products (PPPP) captured; reduce consumer confusion as to what packaging and products are recyclable in Ontario; and begin to address issues related to certain single use items (see Table below).

Proposed Materials to be Designated under the RRCEA

Designated PPPP	Change from current BBPP
<p>All primary packaging, as defined by Sections 59 and 60 of the RRCEA</p>	<ul style="list-style-type: none"> • Alcoholic beverage containers & related packaging should be included to ensure continued proper management and to treat all PPPP under the same legislative framework. • All material compositions captured (e.g., wood, compostable or fabric) to ensure a level playing field for all producers, to avoid “free-riders”, and other unintended consequences.
<p>All convenience packaging, as defined by Sections 59 and 60 of the RRECA</p>	<ul style="list-style-type: none"> • All material compositions captured (e.g., wood, compostable or fabric) to ensure a level playing field for all producers, to avoid “free-riders”, and other unintended consequences.
<p>All transport packaging, as defined by Sections 59 and 60 of the RRECA, excluding road, rail, ship and air containers</p>	<ul style="list-style-type: none"> • All material compositions captured (e.g., wood, compostable or fabric) to ensure a level playing field for all producers, to avoid “free-riders”, and other unintended consequences.
<p>Paper Products, as defined by BC’s Program Plan</p>	<ul style="list-style-type: none"> • Expands beyond printed paper to include purchased posters, calendars, greeting cards, envelopes, and paper for copying, printing, writing, and other general use paper, which is the same as BC. • Results in less free-riders, and provides for better measurement of actual collection, and management performance. • Hard cover books would remain exempt.

Designated PPPP	Change from current BBPP
<p>All packaging-like products which includes:</p> <ul style="list-style-type: none"> • packaging components and ancillary elements that are integrated into the packaging; • products that are indistinguishable from other PPPP captured in the above categories; and • Single-use products with short retention times that are identified as major contributors to litter.* 	<ul style="list-style-type: none"> • Expands to include items that act like packaging & are indistinguishable from other PPPP (e.g., pie plate, cups, bags sold as products). • Expands to include products with short retention times that are increasingly of concern (e.g., flushable products like wet wipes, cigarette filters, straws, stir sticks, utensils) and a significant source of litter.* <p>* Limited to registration, reporting & potentially education requirements</p>

- The list of eligible sources should be defined as:

 - permanent or seasonal single & multi-family households (including rental, cooperative or condominium residential);
 - senior citizen residences and long-term care facilities;
 - elementary and secondary schools;
 - eligible sources component of publicly-operated (municipally-owned or contracted) or privately-operated drop-off depots,
 - dedicated depots, or depots at landfill sites;
 - public space recycling containers; and,
 - municipally or privately owned and operated campgrounds if there are permanent households or seasonal households (i.e., a trailer park).
- A defined common collection system that services the eligible sources and to which all designated producers are obligated to contribute. Alternative collection systems to the common collection system should be permitted, however the Regulation should allow for some considerations such as:

 - Accessibility, collection and management targets must be met
 - Sufficient consequences are required to address non-compliance
 - Programs that don't meet targets can be ordered back to the common collection system
- Best-in-class material specific collection, and management targets should be established (e.g., the Ellen MacArthur Foundation (EMF) [New Plastics Economy Global Commitment](#); the [UK Plastics Pact](#); the [European Union's Single Use Directive](#); and the [Ocean Plastics Charter](#)). Recycling activities should be defined based on what is reutilized back into new products (i.e., discounting process losses and contamination). High targets are essential components of the new regulation and will ensure continual improvement in future years unlike the past two decades where performance has been stagnant.
- Municipal governments providing Blue Box services should have the opportunity to self-determine when their services will transition within the context of a three-year rolling cap of up to one-third of municipal Blue Box services. This will help address the complexity of changing responsibility for the services from municipal governments and communities to producers and reduce risk of service disruptions.
- Producer requirements should be scaled up from the transition period to the post transition period to allow for producers to effectively assume operational responsibility of the current system (see below). Best effort requirements to meet 2026 accessibility, collection and management targets should be established for the transition period.

Requirements During Transition and Post-Transition Phases (2023-2025 & 2026-)

PPPP PROGRAM ELEMENT	DEGREE OF STANDARDIZATION – 2023-2025 Transition	DEGREE OF STANDARDIZATION – 2026 and Beyond
List of PPPP materials to be collected and managed	<ul style="list-style-type: none"> At a minimum, maintain collection list in each transitioned municipality that existed prior to transition 	<ul style="list-style-type: none"> Standardized across the province. All materials would have to participate in the common collection system and/or equivalent alternative).
List of eligible sources	<ul style="list-style-type: none"> At a minimum, maintain eligible sources allowed under BBPP and require that any new eligible developments be serviced when they reach a defined occupancy rate 	<ul style="list-style-type: none"> Match accessibility provided by local government garbage collection systems (e.g., curbside, depot, public space) and require that any new eligible developments be serviced when they reach a defined occupancy rate. Also, all multi-unit residential, retirement & long-term care homes, elementary and secondary schools, and an expansion of public space recycling.
Service Levels	<ul style="list-style-type: none"> Maintain current municipal collection frequency 	<ul style="list-style-type: none"> Minimum Provincial standard (e.g., at a minimum bi-weekly). Flexibility reflecting community size, density and geographic location. Flexibility in type of container but size must be adequate to store and set out the projected quantities of PPPP materials in that community taking into consideration collection frequency.
Promotion & Education Requirements	<ul style="list-style-type: none"> At a minimum, maintain current efforts and promote behaviour change (recycling, litter abatement, reduction, etc.) Allow for flexibility in local promotion messages and sorting instructions; especially where integrated waste collection systems are in place 	<ul style="list-style-type: none"> At a minimum, promote behaviour change (recycling, litter abatement, reduction, etc.) Allow for flexibility in local promotion messages and sorting instructions; especially where integrated waste collection systems are in place.

- The regulation must ensure transparency and accountability through reporting, record keeping and auditing protocols.

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1.0 Background

In early 2017 key producers of packaging, paper, and packaging-like products (PPPP) and municipal governments met to discuss the future of Ontario's Blue Box in the context of growing challenges for both municipalities and producers. These challenges included:

- A rapidly changing mix of packaging and paper products in the Blue Box residential recycling stream;
- Disconnect between those who supply PPPP and those who collect, process and market the PPPP;
- A fragmented municipal recycling collection and processing system that does not easily accommodate system-wide rationalization to standardize items collected, increase collection rates, improve scale efficiencies, reduce contamination, and mitigate commodity market risks;
- New investment in Ontario's recycling collection and processing system has been hindered due to uncertainty related to the future direction of the Blue Box Program; and
- An increased focus on quality in global recyclable material commodity markets.

Due to the above conditions, both municipalities and producers were facing rapidly increasing shared system costs without levers to mitigate these costs under the current regulatory environment.

In April of 2017, an agreement was reached between the parties that:

- Producers ought to be the party that assumes full operational and financial responsibility for delivering the Blue Box to Ontarians; and
- An amended Blue Box Program Plan (a-BBPP) might provide a mechanism to affect the orderly transfer of operational responsibility from municipalities to producers as a first step to full operational and financial extended producer responsibility (EPR). This would set the stage for a second step to an individual producer responsibility (IPR) regulation under the *Resource Recovery and Circular Economy Act, 2016* (RRCEA).

The Minister directed the Resource Productivity and Recovery Authority (the Authority) and Stewardship Ontario to develop a proposal for an a-BBPP.

However, the a-BBPP proposal was not completed prior to the Minister's deadline and the pending spring 2018 provincial election. This left some key outstanding issues without policy direction from the Ontario government, including:

- What accessibility, collection and recycling targets would be appropriate, including associated terminology definitions and calculation methodologies;
- What reporting mechanisms for oversight and enforcement would be required; and
- What timelines would be for the next stage of transition to IPR under the RRCEA.

While unsuccessful, the a-BBPP process provided some essential learnings. The most important was that this interim step was unnecessary and instead perpetuated many of the challenges all stakeholders face in the current system. Moving PPPP under the RRCEA as soon as possible should be the goal of all stakeholders as all parties' benefit.

The RRCEA ensures transparency; it focuses on outcomes over process; provides producers with flexibility in decision-making; and ensures proper oversight and enforcement. It also smoothly moves stakeholders away from a process that requires constant government intervention.

The M3RC applauds the Ontario government announcement on August 15, 2019 that provides certainty around the timeline to transition the Blue Box to full producer responsibility under the RRCEA, as it will enable:

- Much needed investments into Ontario's recycling collection and processing infrastructure;
- Informed business decisions between municipalities and their contractors;
- Producers to prepare to assume their future obligations;
- Producers to drive towards outcomes-based performance standards, and incentivize them to innovate their PPPP and the associated end-of-life collection and management systems; and

- A schedule and framework for municipal governments, their existing service providers, producers, and their future service providers to develop interim steps that will enable a smooth transition.

It is important to note that the same approach has already been successfully taken for the recycling of used tires. The transition has led to new investments being made and ensured that used tires continue to be managed properly.

The M3RC has been providing advice to the sector since 2017. This includes being active in both the mediation process by Special Advisor, David Lindsay, and now in the current consultation on the regulation being held by the Ministry.

The recommendations made by the M3RC are informed by the recommendations made in Mr. Lindsay's report that were accepted by the Ministry. They also align with the provincial interests incorporated in the RRCEA, and the public policy objectives of the Blue Box mediation process as set out in the Minister's mandate letter to the Special Advisor.

2.0 Approach

The M3RC has provided recommendations that cover six (6) topics/sections:

- What materials should be designated (i.e. covered in the regulation);
- Who is responsible;
- How should municipal programs transition;
- What is required during the transition phase (e.g., 2023 – 2025);
- What is required post transition (e.g., 2026 -); and
- What other provisions are necessary.

3.0 Designating Materials

M3RC recommends that the PPPP regulation designate materials broadly based on the definitions already in the RRCEA and reflect the products and packaging definition in [British Columbia's \(BC\) Packaging and Paper Product Extended Producer Responsibility Plan](#), as it includes primary packaging, convenience packaging and transport packaging (excluding road, rail, ship and air containers). Both convenience and transport packaging are growing given the increased demand for home delivery of goods and food.¹

The definitions of primary, convenience and transport packaging should be expanded slightly from the current definitions in Ontario's Blue Box Program Plan to include:

- all alcoholic beverages (currently exempt) and their packaging that are placed by consumers into the PPPP system to ensure continued proper management and to treat all PPPP under the same legislative framework;
- all packaging captured regardless of what the material was manufactured with (e.g., wood, compostable, fabric) to ensure a level playing field for all producers, to avoid "free-riders", and other perverse consequences; and,
- an expanded paper products definition, similar to BC's Program Plan (e.g., newspapers, news print, posters, calendars, greeting cards, envelopes and paper for copying, printing, writing and other general use paper), which reduces "free-riders", and a provides a better measurement of actual collection, and management performance.
- Hard cover books would remain exempt.

A new category called "packaging-like products" should be included and defined as:

- Packaging components and ancillary elements integrated into packaging already captured in BC's and Ontario's program plan;

¹ Vox. 'Food delivery and takeout are on the rise. So are the mountains of trash they create,' December 4, 2019. Available at <https://www.vox.com/the-goods/2019/12/4/20974876/takeout-delivery-waste-grubhub-recycling>.

- Products that are indistinguishable to the consumer from other PPPP captured², as they are currently “free-riders” in the current system, and do not contribute to the collection / recycling targets; and
- Single-use products with short retention times that are increasingly of concern (e.g., flushable products, cigarette filters, straws, stir sticks, utensils) and a significant source of litter which have been identified globally as an urgent issue to address.

While this list increases the basket of goods captured, there is a strong rationale to do this:

- Ensures equity – all packaging would be treated equally and perverse outcomes from exclusion of certain material types would be avoided. This should help ensure a level playing field for producers and reduce “free-riders”.
- Simplifies the management of materials for consumers – consumers should not be forced to evaluate the context of PPPP to understand if it is captured under the provincial regulation. Currently an aluminium pie plate that holds a pie bought from a retail outlet is considered convenience packaging and captured in the Blue Box Program Plan. However, a package of aluminum pie plates bought for use in the home is considered a product and is not captured in the Blue Box Program Plan. These rules do not make sense to the consumer and should be changed. This also helps to reduce free ridership for those items that will inevitably make their way into the program.
- Addresses single-use items and litter – There has been an urgent call for action on these items globally. Additionally, a strong declaration by producers³ was made for a harmonized approach to single-use plastics at the provincial and federal levels of government. This regulation could make an important contribution to this goal by requiring that producers of single-use plastic items (e.g., flushable products, cigarette butts, utensils, straws, stir sticks, etc.) report on the amount of these products supplied into the market.

The requirements for each type of PPPP can differ (e.g., reporting, registration, collection, and management). Specifically, for problematic single-use products, the proposal is for producers to report on the quantities of products to better understand generation rates and to consider potential promotion and education efforts to ensure better management of PPPP at the end-of-life.

Eligible Sources

The M3RC recommends that eligible sources be defined in the regulation based on an amendment of the definition in the [Municipal Datacall Guide](#), with the following changes noted in red:

Public, ~~or~~ municipal ~~or~~ private contract-based collection of or from:

- Permanent or seasonal single & multi-family households (including rental, cooperative or condominium residential)⁴.
- Senior citizen residences and long-term care facilities.
- ~~Elementary Public~~ and secondary schools ~~collected along a residential collection route, concurrently with residential tonnes.~~
- The ~~residential-eligible sources~~ component of publicly-operated (municipally-owned or contracted) drop-off depots, at dedicated depots, or depots at landfill sites.
- Public space recycling containers, ~~whether operated in parks, streetscapes or public facing local government buildings if they are collected on a residential collection route concurrently with residential tonnes~~ (tonnes from local government special events/festivals are ~~not~~ eligible).

² Examples include convenience packaging provided at a retail or in bulk to the consumer. The goal is to ensure packaging-like products (e.g., sandwich bags, freezer bags, coffee pods etc.) that ultimately end up in the recycling system are included.

³ Retail Council of Canada. ‘Open Letter to Ontario Government: A harmonized approach to single-use plastics is better for business than municipal patchwork,’ October 3, 2019. Available at <https://www.retailcouncil.org/press-releases/open-letter-to-ontario-government-a-harmonized-approach-to-single-use-plastics-is-better-for-business-than-municipal-patchwork/>.

⁴ A discussion will be necessary on how to manage residential dwellings on private roads which have potential liability issues.

- Municipally **and privately**-owned and operated campgrounds can be reported as eligible sources only if there are permanent households or seasonal households, i.e. a trailer park (weekend campgrounds are considered IC&I).⁵

This definition retains the intention of the Special Advisor’s Report, as it was clear the definition of PPPP should exclude industrial, commercial, and institutional materials (ICI) that are outside of the current Blue Box Program Plan. It also ensures that the definition is enforceable and equitable. With a shift to producer responsibility, it is not equitable or easily enforceable to limit eligibility to only those concurrently collected upon a municipal collection route. As a result, the above changes should be made and defined within the regulation.

4.0 Defining Responsibility and Management

The M3RC recommends that the definition of “responsible producer” should take a similar cascading approach to [Ontario’s Used Tires Regulation](#), [BC’s PPP program plan](#), and in [Stewardship Ontario’s draft amended Blue Box Program Plan](#) (e.g. brandholder, first importer, marketer [resident and not]).

De Minimis

The M3RC understands de minimis requirements may be necessary as it reduces the burden on small business and aligns with risk-based compliance protocols. Ontario’s current de minimis under the existing Blue Box Program Plan exempts producers with annual gross sales in Ontario of less than \$2 million or who supply less than 15 tonnes of designated materials into Ontario annually or whose products are included under a separate regulation (e.g. household hazardous or special waste).

We note that British Columbia, Quebec and some European programs have lower de minimis levels and provide options for simplified reporting and flat fee payments for smaller generators. Table 1 provides a comparison of different de minimis levels in Canada.

Table 1: De Minimis Requirements in Canada

Jurisdiction	De Minimis
British Columbia	<ul style="list-style-type: none"> • <\$1M revenue and/or <1 T PPPP supplied to market; • Single point of retail sale (not a franchise/chain); or • Is a registered charity.
Quebec	<ul style="list-style-type: none"> • <\$1M revenue and/or <1 T PPPP supplied to market; • Flat-rate contribution for enterprises who market annually between 1 and 15 metric tons of material. • Newspaper enterprises who put in the market less than 15 metric tons annually.

The M3RC’s interest in de minimis setting is based on the impact it will have on collection and management targets as it impacts the denominator in these calculations.

Defining Recycling

It is recommended that the regulation be technology agnostic. If mechanical and chemical processes can produce base products, materials or substances that can be re-incorporated into new products, they should both count towards recycling.

The current definition of recycling should change to be consistent with the new EU recycling calculation. That calculation moves the point of measurement to the input into the final recycling facility - after all

⁵ Note ensure new storage locker collection services for residential PPPP deliveries are included (e.g., <https://www.penguinpickup.com>).

sorting has taken place. Contamination and process losses should also be removed from the weight of materials recycled as reported to the Authority. This ensures that Ontario moves to a system that values the quality of materials and away from a system that puts a greater focus on quantity over quality. If direct sources of this information are not available, alternative approaches such as processing efficiency standards with mandatory auditing and reporting could be used.

Municipal governments also support standardized digital reporting requirements for all recycling and composting facilities. These requirements should not duplicate environmental compliance reporting requirements but instead allow for streamlined reporting. This would allow for better oversight and a more fulsome understanding of market conditions.

Defining Organic Processing

It is recommended that the regulation recognize composting and other types of organics processing, such as anaerobic digestion, which produce nutrient based products that are used to enrich the soil. These activities should be included as an eligible management methodology towards achievement of targets. Some PPPP items are already captured in green bin programs in Ontario such as shredded paper, and soiled pizza boxes. It is however important to note that items that are currently labelled as compostable cannot be composted in most organic process facilities in Ontario. This is a growing issue globally so it is important that proof exists that the materials are actually being properly processed into a product. Municipal governments should not be forced to accept materials in their programs that they cannot properly process.

Inclusion of Energy Recovery

AMO and many municipalities (with some variations) have endorsed a position to adhere to the waste hierarchy and the premise that recovery be considered a higher use in the waste hierarchy than disposal.

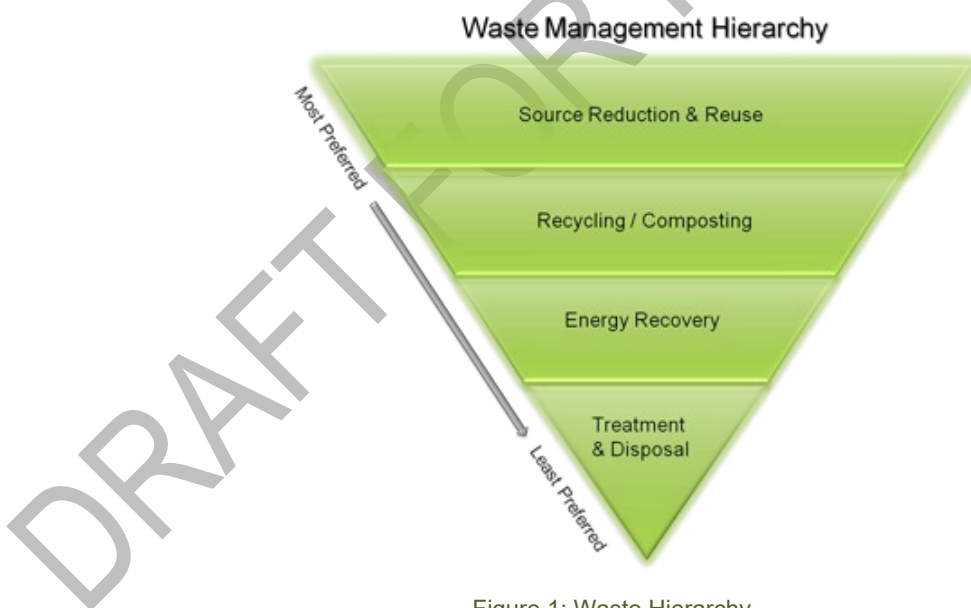


Figure 1: Waste Hierarchy

The Regulation should adopt a waste hierarchy approach to reporting for the management of collected materials in a similar manner to BC which separately accounts for materials managed as engineered fuels and energy-from-waste / incineration, as well as accounting for the amount sent to landfill.

The regulation may want to incent producers to use recovery options for residuals, versus landfill disposal in the Regulation. However, this should not be credited towards meeting reduction, reuse or recycling /

management targets. This approach would align with recommendation from Special Advisor, David Lindsay.

5.0 Transition Mechanism

Municipal governments providing Blue Box services should have the opportunity to self-determine when they want their services to transition. A data collection exercise is already underway to have municipal Councils providing Blue Box services submit the following information by June 30, 2020:

- What date the Council would like to transition their blue box services;
- Rationale for selecting this date;
- Express if the municipal government has interest in potentially providing services to producers if satisfactory commercial terms can be reached, or not; and
- A key contact within each municipality should questions arise.

A number of municipal resolutions have already been passed and are being sent to both AMO and the Ministry.

The proposed transition process would see a three-year rolling cap of up to one-third of municipal Blue Box services. If the data collection exercise determines that municipal preferences for transitioning can be organized to match the rolling cap of one-third of the services transition in each year of transition, the transition dates for each municipality should be identified in a schedule to the regulation. This will help address the complexity of changing responsibility for the services from municipal governments and communities to producers and reduce risk of service disruptions.

If any of the first two years are over-subscribed relative to the rolling cap, the M3RC recommends that a mechanism for determining individual municipality transition dates should be established by the government, and the schedule for municipalities to transition included in the regulation. This could include the development of criteria to aid in prioritizing individual municipal transitions (i.e., contract expiry dates, transition dates of neighbouring municipalities etc.). Additional conversations would occur between municipal governments should this be the case.

Obligation for Non-Transitioned Municipalities

Municipal governments providing Blue Box services should be compensated by producers under the Blue Box Program Plan for 50% of their net verified costs based on the guidelines in the Authority's [Datacall Guide](#) until they have been fully transitioned. The Authority should continue to audit Datacall submissions and QA/QC submissions for accuracy. However, the best practice, efficiency/effectiveness and cost containment metrics, methodologies and modelling exercises that have been proven not to work and that result in litigation between the parties must be eliminated. This change was agreed to by the parties during the a-BBPP consultation process.

O. Reg 101/94 and Transitioned Municipalities

Once a municipality transitions, the requirements under [Ontario Regulation 101/94](#) for municipalities with population of at least 5,000 to operate and maintain a Blue Box management system must cease to apply.

6.0 Pre-Transition Requirements

Producer Registration and Reporting

The regulation should require designated producers to register and report annual supply data a year before transition (e.g., 2022). The data captured in the preceding years to completion of full transition of

municipalities will assist with measurements and the need for any changes that may be necessary to targets. This data should ensure consistent detailed reporting as is currently done through the Blue Box Program Plan.⁶

This will allow for a better understanding of changes that may be necessary to material categories over time and track program status. This data should be made available to the industry funding organization i.e., Stewardship Ontario to support collection of steward fees to fund non-transitioned municipalities until wind-up is complete.

Producers should calculate the amount of designated materials that they determine are supplied into eligible sources (see Section 3.0) in the Province, and make transparent the rationale for how they determined these quantities (Table 2).

Table 2: Reporting Supplied During Pre-Transition Phase

Reported in	Rationale
All designated materials by packaging type (e.g., similar to CSSA Reporting Requirements with inclusion for additional material types such as compostable and wood)	<ul style="list-style-type: none"> • Already detailed report – no additional burden • Reporting to the Authority but can provide access to the Industry Funding Organization
Eligible Sources (with rationale) vs Total Supplied	<ul style="list-style-type: none"> • Transparently demonstrate how this is calculated

Producers have robust data management systems to track the total quantities and types of products they supply into their markets. Since the enactment of the *Waste Diversion Act* in 2002 in Ontario and similar regulations in other Canadian provinces, producers, their compliance agencies (Stewardship Ontario, Eco-Entreprise Quebec; Recycle BC; and their service providers such as CSSA) and independent reporting service providers have developed detailed protocols for translating these detailed sales figures into PPPP equivalencies for the purposes of reporting on their stewardship obligations and to pay fees on detailed material sub-categories. However significant challenges remain with accurately determining what percentage of these materials are consumed and generated as waste within “eligible sources”.

Determining the amount of PPPP that ends up in eligible sources is an allocation that each producer makes, which is then verified by the Authority. To determine which PPPP ends up in residential homes, apartments, schools, public places, long term care homes, versus offices, workplaces, shopping malls and hotels is an inexact science. The means by which individual producers determine what percentage of their total sales are determined to be “eligible” needs to be completed transparently and subject to audit.

Transparency on the total of materials supplied will provide essential data to accurately monitor progress towards targets. It will also support effective planning to improve the recycling performance for the significant quantities of PPPP that will continue to be generated outside of “eligible sources”.

Given the staggering changes underway in product and packaging design and consumer consumption patterns related to prepared food home food delivery⁷, delivered home meal kits, and on-line shopping⁸, it

⁶ Canadian Stewardship Services Alliance. ‘2020 Guidebook for Stewards,’ January 2020. See pages 56-78 available at https://www.cssalliance.ca/wp-content/uploads/2019/01/CSSA-2020-Guidebook_FINAL-Jan-7.pdf

⁷ Vox. ‘Food delivery and takeout are on the rise. So are the mountains of trash they create,’ December 4, 2019. Available at <https://www.vox.com/the-goods/2019/12/4/20974876/takeout-delivery-waste-grubhub-recycling>.

⁸ Toronto Star. ‘I went undercover as an Amazon delivery driver. Here’s what I learned about the hidden costs of free shipping,’ December 19, 2019. Available at <https://www.thestar.com/news/investigations/2019/12/19/i-went-undercover-as-an-amazon-delivery-driver-heres-what-i-learned-about-the-hidden-costs-of-free-shipping.html>.

is important to understand how these consumption and waste generation patterns are changing. This especially pertains to transport and convenience packaging delivered to eligible and non-eligible sources.

Supply data reported by the designated producer into the Registry should be accessible, at the producer's choice, to their Producer Responsibility Organization (PRO), as is currently the case for used tires, to avoid duplicative reporting.

Service Providers Registration

Service providers (collectors, haulers, processors, and PROs) should be required to register a year before the regulation comes into force.

7.0 Transition Phase (2023 – 2025)

M3RC understands that during the transition phase there are a number of complexities to transitioning a system with varying:

- Materials accepted in municipal collection systems;
- Collection system designs and service levels;
- Processing system designs and capabilities; and
- Contract terms and requirements.

Designated producers will need some time to transition and improve the common collection system. Target setting and measurement will be more complicated given the scaled transition over three years.

As a result, the M3RC proposes that there be some flexibility allowed to producers during this period – provided producers are making best efforts to meet 2026 accessibility, collection, and management targets.

Within this flexibility, producers should build on the municipal structure that is already in place. Producers during this period would at the minimum, need to ensure that:

- Materials accepted by local governments prior to transition are accepted until all local governments are transitioned.⁹
- Accessibility rates be maintained to current accessibility (e.g., curbside – single-family & multi-unit residential, depot, public space, schools, long-term care) based on the most recent Datacall reporting for a municipality transitioning (or on a one-time registration of collection sites by municipalities). During this time, it should also be required that any new eligible developments be serviced when they reach a defined occupancy rate.
- Promotion and education requirements should promote behaviour change (recycling, litter abatement, reduction, etc.). Flexibility in local promotion messages and sorting instructions should be allowed, especially where integrated waste collection systems are in place.
- Collection frequency should maintain the current municipal collection frequency during the transition period to minimize disruption to Ontarians and service providers.

⁹ There is an opportunity during this period for producers working with their service providers to improve systems and test innovative solutions for a standardized Blue Box system for Ontario by 2026.

Table 3 provides a summary of the Transition Phase requirements.

Table 3: Requirements During Transition Phase (2023-2025)

PPPP PROGRAM ELEMENT	DEGREE OF STANDARDIZATION
List of PPPP materials	<ul style="list-style-type: none"> At a minimum, maintain each municipality's collection list in place prior to transition
List of eligible sources	<ul style="list-style-type: none"> At a minimum, maintain eligible sources allowed under BBPP and require that any new eligible developments be serviced when they reach a defined occupancy rate
Service Levels	<ul style="list-style-type: none"> Maintain municipal collection frequency in place prior to transition
Promotion & Education requirements	<ul style="list-style-type: none"> At a minimum, maintain current efforts and promote behaviour change (recycling, litter abatement, reduction, etc.) Allow for flexibility in local promotion messages and sorting instructions; especially where integrated waste collection systems are in place

Producer Performance Reporting

Designated producers, either individually or through their PRO, would be required to report beginning in 2023 in compliance with the performance requirements in the regulation:

- Accessibility, service levels, and promotion and education.
- Amount of PPPP collected
- How PPPP was managed by tonnage based on the following activities:
 - Used in the production of new products including nutrient based products like compost excluding any losses and contamination in a similar manner as the EU.
 - Recovery including specifically how much material was used as a fuel and how much sent to a waste incinerator that generates energy.
 - Disposed of either in a landfill or a waste incinerator without any energy generation.

The reporting of how materials are managed should be similar to how RecycleBC already reports (See Figure 2).

RECYCLING	RECOVERY	RESIDUAL MANAGEMENT	
Tonnes of material managed by recycling 180,532 tonnes*	Tonnes of material managed by recovery (engineered fuel) 6,185	Tonnes of material managed by disposal 16,742	% of collected tonnes managed by recycling. 87.3%**
	Tonnes of material managed by recovery (energy from waste) 0		

Data above represents audited data from processor on quantities of materials shipped. Prior year-end inventory shipped in the current year and unprocessed and unshipped inventories at year end are both considered.

* Gross tonnes managed by recycling in the Recycle BC system, including newspaper

** Based on gross tonnes collected in Recycle BC system of 206,778 tonnes

Figure 2: Example from 2018 Recycle BC Annual Report

Table 4 provides a summary of reporting requirements and Table 5 provides a description of the categories and subcategories that should be the basis for reporting in relation to collection and management targets. The goal is to ensure that increased producer efforts are applied to low performing, problematic items (e.g., litter) or materials that may have other desirable environmental attributes to divert (e.g., GHG reduction opportunities). It is understood that some discussion may be necessary to balance the specificity of reporting.

Table 4: Reporting Requirements During Transition Phase

Reported	Rationale / Potential for Burden
How the producer met accessibility, promotion and education, and service level requirements including improvements from the baseline	<ul style="list-style-type: none"> • Already detailed reporting – no additional burden • Can be done by the PRO
Amount of PPPP collected (in tonnes)	<ul style="list-style-type: none"> • Already detailed reporting – no additional burden • Can be done by the PRO
How PPPP was managed (in tonnes)	<ul style="list-style-type: none"> • Generally, follows reporting as in BC for PPPP • Materials recycled that excludes process losses & contamination & includes organic processing • Materials sent to recovery (fuel or incineration) • Materials landfilled or incinerated without energy capture • Can be done by PRO

Table 5: Reporting Categories

Base Categories	Specific Sub-Categories
Paper	OCC, ONP, and mixed fibres
Polycoat Cartons	Gable top, aseptic
Rigid Plastics	PET, HDPE, PP, Polystyrene, Other rigid plastics
Flexible Plastics	Single material, multi-material
Metal	Ferrous and non-ferrous
Glass	N/A
Items Marketed as Compostable	Fibre and "plastic-like"
Wood	N/A
On-the-Go Containers	(e.g., take-out and home delivery food service packaging such as pizza boxes, cups, bags, folded cartons, wraps, trays, etc.) *Excluded from material specific categories above
Non-Alcoholic Beverage Containers	(e.g., sealed non-alcoholic beverage containers under 1L) *Excluded from material specific categories above
Alcoholic Beverage Containers	N/A *Excluded from material specific categories above

8.0 Post Transition Phase (2026 -)

The targets established for the post transition phase (2026 -) will become the drivers for any system improvements occurring during the transition phase (2023-2025). The importance of establishing high targets to drive activities cannot be understated.

Accessibility

Once the system is fully transitioned, designated producers should be required to have PPPP accessibility in place that at a minimum:

- Matches accessibility provided by local government and private garbage collection systems servicing eligible sources across the province (e.g., curbside, multi-family, depot, public space). Any new eligible developments be serviced when they reach a defined occupancy rate.^{10, 11}
- Provides PPPP services to all multi-unit residential dwellings, all senior citizen residences and long-term care facilities, and all elementary and secondary schools.
- Expands public space recycling to an accessibility standard to be defined through further consultation.

¹⁰ This will mean that producers will be required to provide servicing to any community in Ontario that has an organized garbage collection system regardless of size.

¹¹ A discussion will be necessary on how to manage residential dwellings on private roads which have potential liability issues. Indemnity agreements are often used but given this is a growing issue as a result of medium density developments it should be discussed.

Producers will likely work collectively either through one or multiple PROs to discharge their obligations. As such, it is critical that the regulation ensure that a single common collection system remains in place, be accessible to all Ontarians, and that the costs of this common system are allocated fairly among obligated producers. This approach to ensure equal access to a shared system is common where participants require access to essential infrastructure such as transportation links, telecommunication, Interac or product barcodes.

In other jurisdictions where producers have chosen to work through multiple PROs, there are working examples of how a common collection system has been maintained while fairly allocating the costs of this common system to producers on the basis of their market share of obligated materials.

Post collection, producers should have flexibility in how to manage their materials within the confines of the regulatory outcomes established.

Producers should be provided flexibility within the regulation to provide curbside and/or depot servicing through whatever collection receptacle they choose so long as they:

- provide sufficient capacity to store and set out the anticipated quantities of PPPP materials taking into account collection frequency or delivered taking into account depot operating hours;¹² and
- are consistent with relevant local bylaws and health, safety and environmental policies.

Producers should have flexibility in how they match local government garbage collection (i.e., curbside municipal garbage collection would mean curbside PPPP collection). This includes complementary and/or alternative collection systems that producer may choose to employ (see Alternative Collection System).

The regulation should not dictate the role of municipalities in any way. Municipal governments should be allowed to decide whether they choose to enter into any commercial terms with producers for management of PPPP through municipal or their privately contracted processors of new or existing source separated organics diversion programs. Municipal governments should not be required to collect or manage PPPP.

Alternative Collection System

By January 1, 2026, all obligated producers will have the same accessibility obligations (i.e., collection of all designated PPPP materials through a common collection system). Some producers may want to implement collection systems that are operated in conjunction with or as an alternative to the common collection system. The RRCEA was developed as an outcomes-based approach to move away from the Industry Funding Organization model which was not serving everyone's interests and enabling these types of approaches by producers.

Municipal governments recognize that this is an issue for other stakeholders to weigh in on more deeply, however some considerations are offered on how this is ultimately managed:

- Accessibility, collection and management targets must be met
- Sufficient consequences are required to address non-compliance
- Programs that don't meet targets can be ordered back to the common collection system

Standardization of Materials Collected

After transition, all designated materials (excluding problematic single use products – see Table 1) should have the same accessibility obligation of being required to be collected in common collection system. That is unless the obligated producer is using an alternative (e.g., deposit return, return to retail, mail back system) that addresses the considerations laid out above.– see Alternative Collection System). This would result in a standardized material collection list across the province.

¹² Note another consideration on this issue relates to physical storage space, especially in high-density urban areas or in multi-residential buildings with limited storage space.

Service Levels

At a minimum service levels for the collection system should meet service levels of [O. Reg 101/94](#), with the following changes noted in red:

- The frequency of the collection of source separated obligated material required must be **at least half the frequency at which local government garbage is collected directly from the sources of the waste (and no less than bi-weekly)**.
- The **Blue-Box-waste-PPPP** management system must be adequate to deal with the anticipated materials set out.¹³
- The **Blue-Box-waste PPPP** management system must include the provision of adequate containers for the acceptance of source separated materials required.

Ultimately producers should have the ability to change collection frequency post transition as long as adequate storage volume is provided and any changes are consistent with relevant regulations.

Table 6 provides a summary of post transition requirements.

Table 6: Post Transition Requirements (2026 -)

Producer Performance Targets – Collection & Management

PPPP Program Element	Degree of Standardization
List of PPPP Materials	<ul style="list-style-type: none"> • Common across the province. • All materials would be subject to the same accessibility targets (e.g. standardized list).
List of Eligible Sources	<ul style="list-style-type: none"> • Match accessibility provided by local government garbage collection systems (e.g., curbside, multi-family, depot, public space) and require that any new eligible developments be serviced when they reach a defined occupancy rate. • Also, the addition of all multi-unit residential, all retirement & long-term care homes, elementary and secondary schools and an expansion of public space recycling.
Service Levels	<ul style="list-style-type: none"> • Minimum provincial standard (e.g., bi-weekly). • Flexibility reflecting community size, density and geographic location. • Flexibility in type of container but size must be adequate to store and set out the projected quantities of PPPP materials in that community taking into account collection frequency.
Promotion & Education requirements	<ul style="list-style-type: none"> • At a minimum, promote behaviour change (recycling, litter abatement, reduction, etc.) • Allow for flexibility in local promotion messages and sorting instructions; especially where integrated waste collection systems are in place

Major producers have voluntarily set corporate commitments (e.g., the Ellen MacArthur Foundation's [New Plastics Economy Global Commitment](#); the [UK Plastics Pact](#) Report which has been adopted as the model for a global network of Plastic Pact countries which now includes France, Chile, the Netherlands,

¹³ This should include consideration of the required dwelling storage capacity of set-out containers and strategies for minimizing litter.

South Africa and Portugal) and governments around the world are also establishing rigorous targets (e.g., [European Union Single Use Directive](#), [Ocean Plastics Charter](#)). For more information, see Appendix A.

Ontario should establish itself once again as a leader and drive best-in-class environmental outcomes through high collection¹⁴ and management targets. Table 7 provides examples of targets from the EU and BC as well as Ontario's current status. It is important to recognize that each of these jurisdictions measure targets in a slightly different manner

- Ontario's current diversion rates are based on the quantity of materials *marketed* (excluding any form of land application or energy recovery)
- BC's performance rate is based on the total quantity of obligated materials collected as a percentage of the estimated quantity of obligated materials supplied to residents in communities serviced by the PRO
- The EU's rates are based on the quantities of materials delivered to a *recycling* process (excluding contaminants in the in-bound material and process losses)

There are also differences as to whether beverage containers are included in material specific rates and estimates made by producers as to the quantities of obligated materials that they supply into the market (e.g., deductions for de minimis provisions, and how designated material categories are defined).

¹⁴ Also provides a means to measure litter reduction.

Table 7: PPPP Targets

	Ontario (2018 – PIM) ¹⁵	BC 2018 Collection Rate	BC Collection Targets	European Union (Actual Recycling Targets)
Paper ¹⁶	Paper Packaging – 72% Printed Paper – 71%	87%	90% - 2020	75% - 2025 85% - 2030
Plastic ¹⁷	30%	41%	50% - 2025	50% - 2025 55% - 2030
- Rigid ¹⁸	54% (PET & HDPE)	50%	55% - 2022 60% - 2025	N/A
- Flexible ¹⁹	10% (Plastic Film)	20%	22% - 2022 25% - 2025	N/A
Metal	54%	66%	67%	N/A
- Ferrous ²⁰	62%	N/A	N/A	70% - 2025 80% - 2030
- Non-Ferrous ²¹	41%	N/A	N/A	50% - 2025 60% - 2030
Glass ²²	68%	72%	75% - 2020	70% - 2025 75% - 2030
Wood	N/A	N/A	N/A	25% - 2025 30% - 2030
Beverage Containers ²³	95% beer refillables 80% alcohol non-refillable	91% beer refillables 82% non-refillable		77% - 2025 90% - 2029

Progressive collection and management targets should be established, as has been done both in BC and Europe. Future year targets allow producers to plan investments in capital planning or contracts, prioritize investments and effectively deploy recycling facility capacity in Ontario. As mentioned earlier, high targets are essential to ensure continual improvement over coming years unlike the past two decades which have seen stagnant performance.

It will be important to focus on increasing the recycling rates of the lowest performing PPPP (e.g., those which represent significant components of land and marine litter) and materials that may have other high environmental impacts (e.g., GHG reduction opportunities). It is recommended that the material categories identified in Table 7 be used.

¹⁵ Available at <https://stewardshipontario.ca/stewards-bluebox/fees-and-payments/>.

¹⁶ Paper includes any type of cellulosic fibre source including, but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources. Includes newsprint (CNA/OCNA & Non-CNA/OCNA), OCC and boxboard, magazines and catalogues, telephone books, aseptic and gable top cartons, polycoat containers and cups, and other paper products.

¹⁷ Includes PET bottles, HDPE bottles, plastic film, plastic laminates, polystyrene and other plastics. Any products or packaging designated by the regulation.

¹⁸ PET, HDPE, Polystyrene and Other Plastics such as #5 Polypropylene.

¹⁹ Including Film and Laminates. Includes plastic bags and pouches.

²⁰ Steel and pig iron (and alloys of iron with other metals (such as stainless steel). Includes steel food cans, steel aerosol and steel paint cans.

²¹ Includes aluminum food cans and other aluminum packaging (such as foil and baking containers).

²² Clear glass and coloured glass. Includes food containers or other associated packaging.

²³ Includes all beverage containers regardless of what materials they are made from (e.g., glass, plastic, metal, paper or any combination thereof).

Producers that do not meet their targets should be subject to penalties that will promote greater efforts by them to increase recycling.

Producer Performance Targets – Audit and Verification

Requirements should be included in the regulation for third party audit protocols similar to section 26 of Ontario's [Tire Regulation](#) and the Audit Performance [Procedure developed by the Authority](#).

The M3RC also recommends that seasonal composition audits be completed in selected geographic locations across the Province through a third-party audit of the residential waste stream to assist with the verification of reported outcomes.

The Province should have annual reporting outcomes publicly available online. Given that successful recycling programs are dependent up on high public participation there should be accountability in reporting on the results achieved.

Producer Performance Targets – Circular Economy

The M3RC supports efforts within the regulation to recognize and encourage maximum resource efficiency, waste reduction, and support circular economy goals in the design, use, reuse and reincorporation into the economy. As mentioned previously, high targets are essential as is ensuring penalties are appropriate to discourage non-compliance. The M3RC remains concerned that the Ministry has still not moved forward with an administrative penalties regulation under the RRCEA.

The regulation must include a clause to review and adjust targets on a set schedule (e.g., every 3 years) to drive progressive recycling rates and focus additional resources if required on areas of concern.

Other approaches that could be considered include:

- Requiring major producers to prepare, submit and publicly report on reduction / reuse plans (as is currently required every three years for individual producers that supply more than 300 tonnes of obligated packaging into Belgium).
- Mandatory recycled content provisions like those incorporated into the EU Single Use Plastics Directive (i.e., 25% by 2025 and 30% by 2030).
- Design requirements like those established in the EU Single Use Plastics Directive that require all beverage caps to be tethered to the container or that ban the manufacturing or distribution of certain problematic materials or products/packaging formats that disrupt the recycling of other materials.
- Requiring producers to report on policies and programs that they have implemented to incentivize reduction, reuse, and redesign to facilitate the reduction, reuse, and recycling of their products.
- Requiring PROs to adopt fee setting methodologies that encourage participating producers to select recyclable materials or to improve recyclability (e.g., disrupter fees similar to Norway's deposit return system or as are used to finance France's packaging recycling programs).
- Encouraging PROs to adopt fee modulation policies which provide a direct financial incentive to individual producers to take direct actions that help achieve program targets (i.e. incorporate pro-recycling messages into product and packaging labeling or into their advertising; simplify packaging design to reduce material use or remove problematic materials; increase their use of recycled content; etc.) as is currently in place in France and being considered for adoption in other countries.
- Reporting and/or public disclosure of the quantities of virgin materials used and/or the recycled content of obligated products supplied into Ontario.

Finally, it will be beneficial to consider any such efforts in concert with discussions occurring at the federal/CCME table on plastics to promote harmonization with other provinces, if this can be done in a timely manner.

9.0 Other Complimentary Measures

The Ministry should consider several other complimentary measures including:

- As part of the work they have been undertaking since 2013²⁴ on updating the Ontario Regulations 101/94, 102/94 and 103/94 (i.e., 3Rs Regulation), require Ontario businesses to ban unrestricted distribution and implement 'ask first' or 'by request' policies related to the provision of certain single-use items (e.g., straws, stir sticks, utensils, drink stoppers, condiments);
- Consider banning problematic materials prior to being introduced into Ontario and in alignment with any federal forthcoming regulations;
- Review the Building Code to ensure multi-unit buildings are better designed to accommodate source separation for all diversion streams, especially organics, make participation in diversion streams as convenient as garbage, and include design requirements for the safe and efficient delivery of waste diversion programs and collection services;
- Work with the federal government to provide support for recyclable commodity markets to incentivize the use of secondary materials over virgin material through tax incentives and procurement practices;
- Make changes to the approval process to accommodate minor alterations to existing infrastructure, and in building new or expanded processing infrastructure that support waste reduction, reuse and recycling to help drive waste diversion.
- Remove some current barriers (e.g. faster approvals for recycling facilities and expansions) to ensure new processing capacity can be developed to accommodate new volumes²⁵;
- Implement policies and purchasing practices (e.g., green procurement, mandatory content requirements) that can help increase demand for recycled content and support domestic re-processing markets; and
- Governments should demonstrate leadership by reducing packaging waste generated and single use items in their own operations.

While M3RC supports the concept of disposal bans for all designated materials to increase diversion, greater clarity is required on:

- when and where the ban would apply (e.g., transfer station, landfill, curbside collection, first point of disposal, etc.);
- how the ban would be enforced and how resulting costs incurred by municipal governments could be recovered;
- how potential leakage of banned materials to other jurisdictions or ending up as litter would be addressed; and
- whether exemptions should be considered if there are major disruptions in markets for the collected materials.

Any ban should apply to all designated packaging and products supplied into Ontario and not only to the eligible sources of these materials as defined in the PPPP regulation under the RRCEA.

²⁴ Ministry of Environment and Climate Change. 'An application for review requesting a review of Ontario Regulation 103/94 under the Environmental Protection Act; Industrial, Commercial, and Institutional Source Separation Programs,' February 2013. Available at <http://docs.assets.eco.on.ca/applications/2016-2017/R2012013-undertaken.pdf>.

²⁵ See AMO's response to the "Reducing Litter and Waste in our Communities" discussion paper for examples. Available at <http://www.amo.on.ca/AMO-PDFs/Waste-Management/Waste-Diversion/2019/Reducing-Litter-and-Waste-in-our-Communities-Discu.aspx>.

Appendix A: Global Commitments

Plastic Pact (UK)



By 2025:

- Eliminate problematic or unnecessary single-use plastic packaging through redesign, innovation or alternative (re-use) delivery models.
- 100% of plastic packaging to be reusable, recyclable or compostable
- 70% of plastic packaging effectively recycled or composted
- 30% average recycled content across all plastic packaging

Figure 3: UK Plastic Pact Commitments (with examples of signatories)

Ellen MacArthur Foundation – Vision of Zero Plastic Waste



Vision:

- Elimination of problematic or unnecessary plastic packaging through redesign, innovation, and new delivery models is a priority
- Reuse models are applied where relevant, reducing the need for single-use packaging
- All plastic packaging is 100% reusable, recyclable, or compostable
- All plastic packaging is reused, recycled, or composted in practice
- The use of plastic is fully decoupled from the consumption of finite resources
- All plastic packaging is free of hazardous chemicals, and the health, safety, and rights of all people involved are respected

Figure 4: Ellen MacArthur Foundation Commitments (with examples of signatories)

Strategy on Zero Plastic Waste (2018):

- Provides an outline for how to achieve a plastics circular economy in Canada and the goal of zero plastic waste

Oceans Plastics Charter (2019):

Includes commitments such as

- Working with industry towards increasing recycled content by at least 50% in plastic products where applicable by 2030.
- Working with industry and other levels of government, to recycle and reuse at least 55% of plastic packaging by 2030 and recover 100% of all plastics by 2040.
- Working with industry towards 100% reusable, recyclable, or, where viable alternatives do not exist, recoverable, plastics by 2030.



Figure 5: Government Commitments