

November 17, 2017

## Recommendations:

- The definition of eligible sources in the [2016 Data Call](#) should be amended for transitioned municipalities to include privately serviced residential buildings and other sources that generate paper products and packaging (PPP) similar to that generated in residences including:
  - Service providers (public or private) collection from:
    - Permanent or seasonal single and multi-family households (including rental, cooperative or condominium residential) and
    - Senior citizen residences and long-term care facilities;
  - The residential component of publicly (municipally-owned or contracted) or privately-operated drop-off depots, at dedicated depots, or depots at landfill sites (accessible to the public);
  - Public space recycling containers in residential areas, elementary schools, secondary schools and parks;
  - Municipally operated or contracted services designed primarily to collect PPP similar to that generated from residences (i.e. containers from parades, sporting events, festivals and other special events);
  - Municipally owned and operated campgrounds with permanent households or seasonal households, i.e. a trailer park (weekend campgrounds are considered IC&I);
  - Publicly owned and operated buildings accessible to the public for community, recreational or educational purposes (i.e. arenas, libraries, and other community centres); and,
  - Places of worship.
- Municipalities that provide Blue Box collection and processing services to business improvement areas, small businesses along residential routes, and businesses in residential areas are encouraged to continue services at their own cost if they choose to transition. This is a major issue for many municipalities but there is an understanding of the rationale to draw the line related to commercial materials. PPP collected from these sources would not be counted towards stewards' targets as currently reported and managed in the Datacall.

## Background:

- The [Accord](#) states:

*In transitioned municipalities, the plan will obligate Stewardship Ontario to provide for the collection and management of PPP generated by residents/households and, working with relevant affected municipalities, consideration will also be given to accommodating associated public spaces, parks and other related services provided by those municipalities;*

*Consistent with the Strategy's desire for an orderly and smooth transition of the Blue Box to EPR we have agreed that such a transition must:*

- *Not negatively impact Ontarians' experience with and access to existing recycling services;*
  - *Improve environmental outcomes;*
  - *Create a consistent recycling experience for all Ontario residents;*
  - *Ensure a fair and open marketplace; and*
  - *Address the provincial interests listed in the Resource Recovery and Circular Economy Act 2016 (RRCEA) thus becoming the blueprint for the future development of a producer responsibility PPP regulation under the RRCEA.*
- The [Minister's letter](#) states:  
*Ensuring a seamless transition of the Blue Box Program ...*
    - *Improve convenience and accessibility by offering collection services to multi-residential buildings that are not being serviced by these municipalities, within an identified timeframe;*
    - *Consider accommodating public spaces, parks and other related services provided by these municipalities; and,*
    - *Consider expanding Blue Box services over time ...*
  - The addition of institutions that generate PPP similar to that generated in residences is in keeping with the current Blue Box program plan, which allows for similar treatment of elementary and secondary schools, publically operated campgrounds, and public space recycling.
  - The additions should include PPP which in many cases are purchased by residents but are consumed away from the home. This will also improve the overall performance of the program.
  - The continuation of Blue Box collection and processing services for these sources will ensure current customers are not stranded. Excluding customer segments that generate PPP similar to that of residences, as eligible sources will present a challenge to many Ontario communities that currently provide this service.

*Granted the pace at which the process is moving, we will likely provide additional comments on this issue.*