

November 17, 2017

Recommendations:

- Stewardship Ontario should approach expansion services in the amended Blue Box Program Plan (a-BBPP) based on two main scenarios:
 - Expanding within a transitioned municipality (e.g. to areas *within municipalities* that are currently not serviced in multi-residential or single family, parks, other related services, as well as changes in servicing, such as depot to curbside); and,
 - Expanding to new municipalities that are not currently serviced.
- For expansion of services within a transitioned municipality, Stewardship Ontario should:
 - Within one (1) year of the municipality transitioning, offer an incentive to expand collection of servicing to all residential buildings in the transitioned municipalities not already receiving Blue Box servicing; and,
 - Within two (2) years of a municipality transitioning, offer an incentive to expand collection of paper products and packaging from associated public spaces, parks and institutions that mirror residential resources and other related services currently being provided by municipalities.
- For expansion of services to municipalities who are not currently serviced, Stewardship Ontario should ensure all communities in Ontario are grouped as part of catchment areas and offered the same opportunity to receive Blue Box services matching how garbage is currently managed in their community (i.e. curbside or depot), when that catchment area transitions.

The proposed recommendations present a clear path that will achieve the desired outcomes, and reflect the Minister's goals and objectives under the *Waste-Free Ontario Act* and accompanying strategy. The outcomes would ensure: i) access and convenience would be maintained as directed by the Minister; ii) increasing levels of accessibility would improve the convenience of waste and recycling at the same time; and iii) short comings of British Columbia's experience in terms of accessibility being limited to only achieving recycling rate performance would be avoided.

Background:

- On August 14, 2017 the Minister of Environment & Climate Change sent a [letter to Stewardship Ontario and the Resource Productivity and Recovery Authority](#) requesting them to formally initiate a consultation and bring forth a proposal on amending the Blue Box Program Plan (a-BBPP).
- The [Accord](#) states:
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; and,*
 - *Create a consistent recycling experience for all Ontario residents.*

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.

- The [Minister’s letter](#) states:
 - *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;*
 - *Consider expanding Blue Box services over time...*

Approach 1: Expanding Services within a Transitioned Municipality

- Stewardship Ontario has proposed the following on service expansions for transitioned municipalities:¹

Multi-Residential (Timeline TBD)	Public Space (Timeline TBD)
Once the program has stabilized, collectors would be eligible to receive a payment per multi-family household.	Stewardship Ontario would evaluate public space recycling provided by communities that provide collection services to Stewardship Ontario.

¹ Based on Stewardship Ontario’s Presentation. “Developing a Proposal for an Amended Blue Box Program Plan – Module 1, the Proposed Transition Process” (October 12, 2017). Available [online](#).

- Stewardship Ontario’s current proposal has not attributed any timeline to service expansions. This falls short of the expectations set out in the Minister’s letter and in the provincial interests set out in the *Resource Recovery and Circular Economy Act* (RRCEA) for improved convenience, accessibility and improved program performance and environmental outcomes.
- The need for a new standard arises from the weaknesses around Regulation 101/94 (Recycling and Composting of Municipal Waste).² For example, the rules for accessibility do not take into consideration other factors like population density, which is arguably a better deciding factor of whether a service should be expanded.

Approach 2: Expanding Services to Municipalities Not Currently Served

- It is not enough just to keep residents who are currently receiving a high standard of Blue Box services. It is important to evolve and improve services and to expand accessibility to those municipalities not currently serviced as well.
- Stewardship Ontario has proposed the following for communities currently not part of the Blue Box program:³

To Communities that do not Currently have Blue Box Programs
<ul style="list-style-type: none"> • Prioritize the transition and stabilization of existing recycling systems before expanding to new services; • Develop conditions such as community willingness and necessary infrastructure; & • Offer payments to depot operators.

- This does not adequately reflect the Accord or the Minister’s letter. There must be an opportunity to recycling designated PPP wherever waste collection services are provided (e.g. “parallel collection”). This collection should match the type of service offered for garbage.
- The concept of implementing “parallel collection” is not new, and has already been built in as a requirement for developing standards in a number of municipalities. It is also the main feature of Vermont’s University Recycling Law whereby, “waste haulers and drop-off centers that offer trash collection services are required to offer recycling and food scrap collection services in advance of each landfill ban going into effect. For example, waste haulers and facilities must offer food scrap collection by 2017, so that there is time for residents and businesses to find a preferred way to manage their food scraps by 2020.”⁴

² Ontario Regulation 101/94. Recycling and Composting of Municipal Waste. Available online at <https://www.ontario.ca/laws/regulation/940101>

³ Stewardship Ontario, Module 1.

⁴ State of Vermont, Agency of Natural Resources. “Vermont’s Universal Recycling Law.” Available online at <http://dec.vermont.gov/waste-management/solid/universal-recycling>.

- A reasonable guideline would be for Ontario residents to be provided at a minimum, PPP recycling collection services through the same means in which they are currently receiving garbage collection:
 - Curbside garbage collection would require the provision of curbside PPP collection;
 - Drop-off depot garbage collection would require the provision of drop off depot PPP collection;
 - Multi-residential garbage collection with the use of front-end collection would require the provision of front-end or other containerized multi-residential PPP collection; and,
 - Multi-residential garbage collection with the use of carts or other containers would require the provision of carts or other containerized PPP collection.

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