

November 17, 2017

## Recommendations:

- Stewardship Ontario should establish an effective promotion & education (P&E) program, that involves two components:
  - **Strategic P&E** that promotes awareness of the Blue Box program’s features, benefits of sorting and recycling, and motivates residents to make informed and proper decisions about waste reduction and reuse; and,
  - **Operational P&E** that supports the day-to-day operational aspects of collection and recycling of PPP.
- The P&E program requires a shared level of responsibility to deliver between Stewardship Ontario and its contracted service providers.
- Roles and responsibilities of producers, service providers (public and private), and the Resource Productivity and Recovery Authority (RPRA) should be defined in all elements of the program including planning, design, implementing, assessing, and ensuring Stewardship Ontario compliance with the agreed P&E program.
- Stewardship Ontario should monitor, measure and report P&E activities as part of their annual report to the Authority (or to an independent third party).
- RPRA (directly or through an independent third party) should track and assess changes pertaining to year-over-year P&E performance by Stewardship Ontario are effective and measured against key performance indicators set in advance.

The proposed recommendations will ensure compliance with the Minister’s goals and objectives under the *Waste-Free Ontario Act* and accompanying strategy. These elements will ensure necessary P&E efforts continue under the industry-led program including outreach to remote and small communities, defines clear roles & responsibilities of relevant stakeholders, and provides the Authority and Minister to check the effectiveness of the P&E program.

## Differentiating between Strategic and Operational P&E

	<b>Strategic P&amp;E</b>	<b>Operational P&amp;E</b>
<b>Definitions</b>	Promotes awareness of the Blue Box program’s features, benefits of sorting and recycling, and motivates residents to make informed and proper decisions about sorting and recycling (e.g. high capture and low contamination)	Supports the day-to-day operational aspects of collection and recycling of PPP
<b>Role of RPRA (or an independent third party)</b>	Provides coordination, oversight and review of P&E	Ensures proper reporting of P&E efforts annually, but would not wade into operations on a direct basis

	Strategic P&E	Operational P&E
<b>Role of Stewardship Ontario</b>	Develops a P&E program that is measurable against key performance indicators	Implements P&E programs for transitioned municipalities, and provides guidance on issues
<b>Role of Service Provider</b>	N/A	Carry out local P&E campaigns that provide operational and practical recycling information
<b>Assessing Effectiveness<sup>1</sup></b>	Effectiveness could be defined by: <ul style="list-style-type: none"> <li>• The scope and breadth of campaign (e.g. does it reach enough/the right people?);</li> <li>• A strong, outcomes-based consumer outreach strategy;</li> <li>• A strong, outcomes-based collection location outreach strategy; and,</li> <li>• A strong, outcomes-based municipal outreach strategy.</li> </ul>	Effectiveness could be defined by: <ul style="list-style-type: none"> <li>• The scope and breadth of campaign (e.g. did it reach enough/the right people?);</li> <li>• Number of tonnes diverted in the Blue Box (e.g. did it have the intended effect); and,</li> <li>• The percentage of residual in other waste streams (e.g. Green bin, garbage, etc.).</li> </ul>

**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 (BBPP).
- The Minister in the letter provides direction:

*It is in the public interest that the proposal for an amended Blue Box Program Plan is consistent with the following principles:*

*Ensuring a seamless transition of the Blue Box Program, specifically:*

  - *Not negatively affecting Ontarians’ experience with and access to Blue Box services;*
  - *Incorporating clear rules to support residents’ participation including standardized materials and services; and*
  - *Improving program performance.*
- Additionally, the letter includes a section on promotion and education that states “For the purpose of increasing resource recovery and reducing Blue Box waste materials, the proposal shall establish an effective promotion and education program, including promoting awareness of the program activities to residents and other targeted audiences and engaging audiences to elicit feedback.”

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<sup>1</sup> Based on the Health Products Stewardship Association. “Program Plan for the Ontario Sharps Collection Program.” May 2013. Available online: <http://www.healthsteward.ca/sites/default/files/OntarioSharpsCollectionProgramPlanFINAL.pdf> (p. 18-19).

- Action 8 of the Province’s “Strategy for a Waste-Free Ontario, Building the Circular Economy” (Feb 2017) is to “Establish promotion & education requirements to support public participation in resource recovery.” This includes the Province considering how P&E needs may need to be customized to maximize resource recovery and waste reduction in multi-residential developments, the industrial, commercial and institutional (IC&I) sectors and in different community types, such as urban, rural and northern communities.<sup>2</sup>
- [Ontario Regulation 101/94](#) (Recycling and Compositing of Municipal Waste) stipulates the P&E requirements for Blue Box waste management systems. Under section 7 (2) (g) the regulation requires
  - *“The provision of information to users and potential users of the Blue Box program”,*
    - (i) *describing the performance of the system,*
    - (ii) *encouraging effective source separation of blue box waste and full use of the blue box waste management system.”*<sup>3</sup>
- Under the existing BBPP the overall P&E responsibility for promoting the Blue Box program lies with WDO (now RPRA) and with individual municipalities. In practice, P&E for diversion programs has remained largely with municipalities in Ontario and this has been fairly consistent with most waste diversion initiatives. Additionally, Ontario municipalities have implemented campaigns to increase the amount of designated material recovered in diversion programs, to reduce contamination in these programs. For example:
  - Partnership with Stewardship Ontario and municipalities: [Peel Expands List of Plastics Approved for Blue Box](#) (October 2013); and,
  - Toronto campaign to reduce contamination: [Recycle Right](#) (2017).
- We understand that the Province may fully or partially rescind Regulation 101/94 with the introduction of a new Regulation under the *Resource Recovery and Circular Economy Act* (RRCEA). If so, there will be a need for P&E including effective consumer awareness and accompanying clarity of P&E roles, responsibilities and accountability. For example, how will customer complaints be managed?
- To date, Stewardship Ontario’s consultation has only mentioned that, “Ontario communities that participate in the Blue Box Program and wish to receive payment will:
  - *...Engage in resident promotion & education activities”*<sup>4</sup>

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<sup>2</sup> Strategy for a Waste-Free Ontario: Building the Circular Economy. February 2017. Available online: [https://files.ontario.ca/finalstrategywastefreeont\\_eng\\_aoda1\\_final-s.pdf](https://files.ontario.ca/finalstrategywastefreeont_eng_aoda1_final-s.pdf) (p. 27).

<sup>3</sup> Ontario Regulation 101/94. Recycling and Compositing of Municipal Waste. Available online: <https://www.ontario.ca/laws/regulation/940101>

<sup>4</sup> Stewardship Ontario. “Developing a Proposal for an Amended Blue Box Program Plan – Module 1, the Proposed Transition Process” (October 12, 2017). Available online: <https://stewardshipontario.ca/wp-content/uploads/2017/08/Amended-Blue-Box-Program-Plan-In-Discussion-with-Municipalities-and-First-Nations-Communities-Module-1.pdf> (p. 28).

- Discussions with municipalities across the Province suggest many are concerned that the lack of clarification for P&E in the a-BBPP will continue to make municipal budget planning difficult given that costs and roles and responsibilities have yet to be defined. Municipalities are also concerned that without this clarity, the relationship with their residents will weaken considerably during transition as residents are likely to defer to municipal offices, given that traditionally Blue Box programs have been operated at that level.
- The amended Plan will need to include a section on Promotion & Education to comply with the Minister's request letter.

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