

Sent by email to: minister.mecp@ontario.ca

July 7, 2025

The Honourable Todd McCarthy
Minister of the Environment, Conservation and Parks
College Park, 5th Floor
777 Bay Street
Toronto, Ontario M7A 2J3

RE: Amendments to the Blue Box Regulation (ERO #: 025-0009) and the *Resource Recovery and Circular Economy Act, 2016* (ERO #: 025-0536)

Dear Minister McCarthy,

The Association of Municipalities of Ontario (AMO) has consistently supported the transition to an Extended Producer Responsibility (EPR) system for recycling, believing it holds the potential to drive innovation and foster a truly circular economy in Ontario.

Proposed Blue Box Regulation Amendments

The recently proposed amendments to the Blue Box Regulation raise concerns for municipalities across the province. These proposed changes risk undermining the very goals of the EPR framework, particularly regarding waste diversion and risks resulting in substantial new cost impacts on municipalities.

Specifically, the proposed delays in recovery targets and modifications to away-from-home collection will undoubtedly impact waste diversion rates. Less material diverted means a greater volume of waste entering municipal landfills. This could lead to higher municipal waste management costs due to increased transportation distances and expenses as existing landfill capacity is consumed more rapidly. These proposals may also exacerbate Ontario's projected landfill capacity crisis, which is anticipated to reach its limit in less than 10 years.

Furthermore, producers were initially set to assume responsibility for expanded public space blue bin material collection, a sensible approach given that most municipal governments will no longer be involved in residential recycling services post-2025. The proposed regulatory amendment, however, would reverse this. Without adjusted regulatory amendments, many municipalities would be forced to decide whether to provide recycling collection for these unserved public spaces at their own expense. Should municipalities not step in to fill these gaps, residents would likely combine recycling and waste streams. Residents rightly expect robust recycling programs and environmental protection, creating an urgent imperative for municipalities to fill these public spaces service gaps. This dual approach to blue bin collection by both municipalities and producers is also inherently inefficient.

A critical concern is the proposal to remove the planned expansion of blue box services for multi-residential buildings, schools, and specified long-term care and retirement homes that are not already municipally serviced. This change creates a fragmented "two-tiered" system where some Ontarians have access to recycling while others do not. At a time when Ontario has

prioritized rapidly building more housing and long-term care, this amendment fails to provide essential recycling for these new residents and facilities, creating a growing service gap at a time when we should be expanding, not limiting, recycling access. This proposed reversal also imposes a significant municipal burden through:

- Disrupted planning. Municipalities have been actively planning and onboarding these properties, often with agreements based on the understanding that producers (PROs) would take over blue box collection by January 2026. This amendment pulls the rug out from under existing plans.
- New service gaps with pressure on municipalities to fill. For example:
 - In Guelph, many multi-residential properties have been receiving municipal service for garbage and organics, while paying for private recycling collection, with the clear expectation that producer-funded recycling would commence in 2026. This amendment leaves the city in a difficult position: does it continue to absorb the cost of private collection, or abruptly shift that burden back to building residents?
 - In large cities like Ottawa, thousands of new multi-residential units are added annually. This change immediately creates a massive and growing number of residents (potentially over 5,000 in Ottawa each year) who will be left without access to the common recycling collection system.

While the stated intent of the proposals is to contain costs, AMO is concerned that many of the proposals will shift costs to the municipal taxpayer and exacerbate Ontario's landfill capacity crisis.

Proposed Resource Recovery and Circular Economy Act (RRCEA) Amendments

AMO supports proposed changes to enhance data collection and transparency across the waste system and make regulations that require PROs to make an offer to municipalities or other specified entities to service small businesses to municipalities or other specified persons. These changes would support a more efficient and effective system.

Beyond AMO's comments, we recommend your staff review additional technical analysis and recommendations on these proposals submitted by The Regional Public Works Commissioners of Ontario and the Municipal Waste Association.

Any questions about this submission can be directed to Karen Nesbitt, Senior Manager at knesbitt@ontario.ca.

Sincerely,



Robin Jones
AMO President

cc: Marc Peverini, Resource Recovery Policy Branch, Ministry of the Environment,
Conservation and Parks