

Sent by e-mail to: [minister.mecp@ontario.ca](mailto:minister.mecp@ontario.ca)

July 15, 2025

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

Dear Minister McCarthy,

AMO and Ontario's municipalities commend the provincial government for its strong, decisive leadership in strengthening our provincial and local economies in the face of evolving global trade dynamics. In this context, AMO supports exploring new approaches to supporting priority projects, provided that important objectives such as health, safety, environmental protection, community well-being are upheld. For example, last year AMO commended your government's "project list" approach, which applied a risk-based method to streamline environmental approvals (EAs) for simple projects. This type of balanced approach helps advance projects faster while maintaining strong environmental protections where warranted.

As you know, Bill 5 removed environmental assessment (EA) requirements for the Dresden Waste Disposal Site (a landfill). We are concerned about the precedent this action may set for other waste disposal sites and the impact on communities trying to manage increased pressure on Ontario's limited waste disposal capacity.

We understand the proposed expansion of the currently inactive Dresden landfill would increase the capacity from the current limit of 75 tonnes to an annual limit of 365,000 tonnes. The proposal would also add new activities such as processing waste into low-carbon fuel. This expansion is only 800 metres away from the residential community of Dresden, and Chatham-Kent – the host municipality – is not supportive of the expansion.

In 2020, your government passed legislation requiring proponents of landfill sites to obtain municipal support for landfills within 3.5 kilometres of residential land. In 2024, following consultation, your government implemented a project list approach for environmental approvals which included waste projects among those subject to a comprehensive EA. That same year, your Ministry issued a decision confirming a comprehensive EA would be required for the Dresden landfill, highlighting it is an opportunity to identify and mitigate any risks, and to gather community feedback. Bill 5 reverses each of these decisions in favour of relying on existing environmental compliance approval (ECA) requirements.

The existing ECAs date back to 1980 and do not cover the full scope of the proposed expansions. The effect of this approach is to significantly expand a small, inactive landfill without adequate environmental review and community engagement. This is particularly concerning because the landfill site is adjacent to prime agricultural land, provincially significant woodlots, and waterbodies which are home to species at risk.

This approach sets a concerning precedent that any of the over 600 active and inactive landfills across Ontario could be similarly expanded. Municipalities understand that Ontario urgently needs increased landfill capacity to support ambitious residential and economic growth goals. We know that a full EA process – which can take as many as 10 years – is onerous and can create delays in meeting waste disposal needs. However, overreliance on the existing ECAs introduces significant environmental, source water protection, and quality-of-life risks.

Municipalities know that before advancing any project, it is essential to gather information, assess and mitigate risks, and engage with residents. While AMO is supportive of the government's efforts to streamline development approvals, we continue to stress the importance of balancing these goals with strong environmental protection.

AMO recommends that the Province establish a modernized approval process for landfills that balances expediting the ability to site and construct waste management infrastructure with maintaining strong environmental and community protection. A balanced approach would empower municipalities and the Province to protect the environment and community well-being while taking decisive action to expand landfill capacity in Ontario.

Consistent with our letter recommending abandoning select proposed amendments to O. Reg. 391/21 Blue Box, municipalities know that some of the pressure to find new waste disposal capacity can be alleviated by increasing waste reduction and diversion efforts. AMO's 2023 "[Ontario Baseline Waste and Recycling Report](#)" and 2021 "[Recommendations for the Diversion of Food and Organic Waste in Ontario](#)" include recommendations to further improve waste diversion.

Addressing Ontario's landfill pressures requires a dual approach: responsibly creating more landfill capacity while simultaneously taking concrete action to reduce the volume of waste entering landfills. We look forward to working with the government to find a lasting solution to meet Ontario's waste disposal needs.

Sincerely,



Robin Jones  
AMO President  
Mayor of the Village of Westport

cc: Sarah Harrison, Deputy Minister, Ministry of the Environment, Conservation and Parks

Attachment: Letter to Minister McCarthy regarding *Resource Recovery and Circular Economy Act*

Sent by email to: [minister.mecp@ontario.ca](mailto: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](mailto:knesbitt@ontario.ca).

Sincerely,



Robin Jones  
AMO President

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