



Sent via e-mail to: [alangdon@circularmaterials.ca](mailto:alangdon@circularmaterials.ca)

March 21, 2024

Nicole Fischer, Chair  
c/o Allen Langdon, President & CEO  
Circular Materials Ontario  
800-1881 Yonge Street  
Toronto, ON M4S 3C4

Dear Ms. Fischer,

**RE: Circular Materials Advocacy**

We are reaching out to seek clarification from Circular Materials regarding your advocacy for changes to the *Blue Box Regulation* and the *Resource Recovery and Circular Economy Act*.

These potential changes, such as:

- the transfer of legal liability from the producer to the PRO,
- moving away from an outcomes-based model to a plan-based model,
- reducing oversight by the Resource Productivity and Recovery Authority,
- restricting competition, and
- changes that could impact public space or the timing of collection for multi-residential buildings

have raised concerns among municipal governments. These potential changes introduce fundamental shifts in policy approaches. Such changes could create long-term major issues in achieving the policy objectives and impact current contracts.

While it seems inappropriate for the Administrator of the common collection system to advocate for such changes, we understand it is Circular Materials members' prerogative to advocate for potential legislative changes. Within any regulation or legislation, there will always be areas for improvement. We do however believe that better policy is achieved through open dialogue. This was a principle applied by the government during the six-month [blue box mediation process](#) led by David Lindsay in 2019 for the former Environment, Conservation and Parks Minister. The complexity of this policy necessitates involvement and feedback from multiple parties.

Municipal governments have a strong interest in supporting actions that align with the government's stated commitments to improve recycling rates and reduce the loss of materials in landfills or as litter in the environment. It is the municipal taxpayer who is responsible for the costs associated with the failure to improve Blue Box recycling in Ontario, be it through the management of landfills, composting facilities or public space litter.

We look forward to receiving information on the changes that Circular Materials is advocating for, as well as the supporting rationale, so that we can work collaboratively to make these policies a success. In addition to receiving a written response to our letter, we would be pleased to meet to further discuss Circular Material's position.

Sincerely,



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Karen Nesbitt  
Senior Manager, Policy  
Association of Municipalities of  
Ontario




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Matt Keliher  
General Manager  
Solid Waste Management Services  
City of Toronto



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Andrew Farr  
Chair, Regional Public Works  
Commissioners of Ontario



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David Douglas  
Chair, Board of Directors  
Municipal Waste Association

- cc. The Honourable Doug Ford, Premier of Ontario  
The Honourable Andrea Khanjin, Minister of Environment, Conservation and  
Parks  
The Honourable Paul Calandra, Minister of Municipal Affairs and Housing, Paul  
Calandra