

December 3, 2020

Submitted electronically via the ERO portal

Ms. Jamelia Alleyne
Resource Recovery Policy Branch
40 St. Clair Avenue West, 8th floor
Toronto, ON M4V 1M2

Subject: ERO Number: 019-2579 A Proposed Regulation, and Proposed Regulatory Amendments, to Make Producers Responsible for Operating Blue Box Programs

We appreciate the opportunity to provide input to the Ontario Ministry of the Environment, Conservation and Parks (MECP) on this proposed regulation under the Resource Recovery and Circular Economy Act, 2016 to make producers responsible for blue box programs. MECP is also proposing to make amendments to O. Reg. 101/94: Recycling and Composting of Municipal Waste to sunset municipal obligations to run blue box systems after transition to full producer responsibility.

Domtar has an interest in a full producer responsibility model for operating the blue box program in Ontario as we may have applicability under the program as a “producer”. We are interested to engage in further dialogue with MECP on the design of various program aspects and on the implementation details. We look forward to opportunities for additional discussions.

Domtar Corporation (Domtar) is a designer, manufacturer, marketer and distributor of a wide variety of wood fiber-based products including communication papers, specialty and packaging papers and absorbent hygiene products. The foundation of our business is a network of fiber-converting assets that produce paper-grade, fluff and specialty pulps. While most of our pulp production is consumed internally to manufacture paper and personal care products, we are also a large volume pulp exporter. Domtar operates pulp and paper mills in British Columbia, Ontario, Quebec and in the United States. We are the largest integrated marketer of uncoated freesheet paper in North America.

As a manufacturer of pulp and paper as our primary products, Domtar’s Canadian operations could have applicability under the Ontario extended producer responsibility blue box program. While our logo branded paper is sold to a retailer in a business to business transaction, some of these paper products can be supplied to a consumer in Ontario.

We understand Ontario’s interest to transform the existing blue box system into a more modern recycling system that is managed and operated by producers. However we are concerned the proposed program could result in higher costs and increased regulatory burden in Ontario.

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It is our understanding there will be opportunities for further engagement with MECP on certain design aspects and implementation details for the extended producer responsibility blue box program. We would appreciate being added to the distribution list to receive these notifications so we can participate in the discussions.

We look forward to the opportunity for further engagement. If there are any questions, please contact me at (715) 886-7785 or via email at annabeth.reitter@domtar.com

Sincerely,

A handwritten signature in black ink that reads "Annabeth Reitter". The signature is written in a cursive, flowing style.

Annabeth Reitter
Corporate Manager, Environmental Regulations