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April 2, 2024

Marc Peverini
Manager, Waste Diversion
Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West, Floor 8
Toronto ON M4V 1M2

Via email marc.peverini@ontario.ca

Re: Blue Box Non-Eligible Sources

Dear Mr. Peverini,

The Township of Strong is writing to the Ontario Ministry of Environment, Conservation and Parks to express concerns about non-eligible sources of Blue Box materials as outlined in the O. Reg. 391/21 Blue Box, and as implemented by Circular Materials in the common collection system. At the regular meeting on March 26, 2024, Council for the Township of Strong supported a resolution from the Township of Perry requesting that the Province amend O.Reg. 391/21 with respect to the non-eligible sources. This has been attached, for your information.

The Township of Strong is a single tier municipality, in the District of Parry Sound, and we operate two depot locations for Blue Box materials. The Township of Joly exclusively uses our depot locations for provision of household waste and Blue Box materials for their residents, and the Village of Sundridge purchases services using our depots as a convenience depot to supplement their curbside collection services. These depots provide collection for Blue Box materials, other divertible materials and garbage and have been for over 30 years, well before most municipalities had implemented an organized recycling program. Each of these municipalities are set to transition to the new Blue Box common collection system in 2025.

During the Blue Box transition period (2025) Circular Materials is permitting municipalities to comingle eligible (primarily residential) and non-eligible (primarily commercial) sources of Blue Box materials in the same collection bins, while incurring a financial penalty to do so.

Starting January 1, 2026, Circular Materials will not permit eligible and non-eligible sources of Blue Box materials to be comingled together.

This poses severe challenges to our municipal taxpayers, and our small commercial sector.

In rural areas such as ours, there are no private waste transfer or disposal stations. Historically, our commercial sector has always relied on municipally owned and operated transfer and disposal stations to drop-off their waste, including Blue Box materials.

Our municipalities will now have to decide if, or how, they support our local commercial sector to divert Blue Box materials away from landfill.

Should we decide to provide Blue Box drop-off services to our commercial taxpayers, we will need to make capital investments in our depots. The Township of Strong has a unique program in place for Blue Box processing – employees currently sort and bale Blue Box materials and work with a broker to arrange pickup of certain streams through the year. We do not currently have a bin drop off system in place. This places a major financial stressor on our municipality, costs of which would transfer to the Township of Joly and Village of Sundridge.

We will need to arrange for separate hauling and processing contracts to collect a small amount of Blue Box materials from the non-eligible sources. As there are no private waste transfer stations or material recovery facilities (MRFs) in our area, the hauling costs will be extremely high. In addition, we will need to determine how to fund a Blue Box drop-off service for commercial ratepayers—either absorbed by the property tax base (which counters one of the proposed outcomes of extended producer responsibility programs), or through a user-pay system, which will place a financial burden on our commercial sector.

Should we decide not to provide Blue Box drop-off services to our commercial taxpayers, the commercial sector will need to source private hauling and processing contracts for their Blue Box materials, at considerable cost to their bottom lines. Worse yet, our commercial sector (which typically is smaller than any of the size thresholds identified in the thirty-year-old O. Reg. 103/94 Industrial, Commercial and Institutional Source Separation Programs), will simply put Blue Box items in their garbage, resulting in less waste diversion, and more waste being landfilled. This results in increased landfilling costs to the municipality.

To maximize waste diversion in the province, we recommend the Minister amend O. Reg. 391/21 to no longer make a distinction between eligible and non-eligible sources of Blue Box materials, and to permit these sources of Blue Box materials—particularly in rural communities with depot-only systems—to be collected together with no financial penalty.

As you can see from the chart below, the property types deemed “non-eligible” by Circular Materials are extremely low:

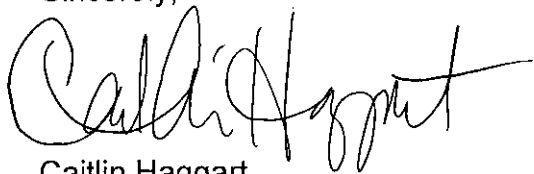
Municipality	Total MPAC Properties	MPAC Properties Deemed Eligible by Circular Materials	MPAC Properties Deemed Non-Eligible by Circular Materials	Percentage
Township of Strong	951	899	52	5.5%
Village of Sundridge*	533	455	78	14.6%
Township of Joly	270	261	9	3%

*Village of Sundridge residential and ICI properties receive weekly curbside pickup currently, therefore their use of the depots are convenience only.

Amending O. Reg. 391/21 to no longer make a distinction between eligible and non-eligible sources of Blue Box materials—a pop can is a pop can regardless of being consumed at home or at work—will go a long way to helping the province meet its waste diversion targets. In addition, it will remove financial burdens potentially faced by municipal taxpayers, and a struggling commercial sector.

Thank you for your attention to this matter.

Sincerely,



Caitlin Haggart
Clerk Administrator

Copy to:

- Andrea Khanjin, Ontario Minister of the Environment, Conservation and Parks, andrea.khanjin@pc.ola.org
- Graydon Smith, Member of Provincial Parliament, Parry Sound-Muskoka, Graydon.Smith@pc.ola.org
- Karen Nesbit, Senior Manager, Policy, Association of Municipalities of Ontario, KNesbit@amo.on.ca
- Andy Pollock, Managing Director, The CIF, apollock@thecif.ca