



June 24, 2025

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**RE: Comments on Proposed Amendments to the Blue Box Regulation (ERO #025-0009)**

Dear Mr. Peverini,

I am writing on behalf of the Ottawa Carleton District School Board (OCDSB) to express our concerns regarding the proposed amendments to the Blue Box Regulation, O Reg 391/21. The OCDSB is comprised of 150 schools and provides an education to approximately **80,000** students within the Ottawa area. Currently we do not have any partnership with the City of Ottawa and all of our waste and recycling is collected and hauled under a private contract.

The Ottawa-Carleton District School Board (OCDSB) operates within the Ottawa region and strives for consistency by offering the same recycling program in all schools that students use at home. This program follows a dual-stream recycling system, where paper and cardboard are separated from mixed plastics, beverage containers, and aluminum/steel cans. Specifically, schools use a black bin for paper and cardboard, and a blue bin for the remaining recyclables. To ensure compliance with Ontario Regulations 102/94 and 103/94, the OCDSB has established a standardized procedure for schools to implement this dual-stream recycling system.

Cascades is currently the only company in Ottawa capable of processing recyclable materials. Until recently, both of the OCDSB's recycling streams were transported to Cascades for processing and sale on the commodities market. The current contract we have with Cascades is set to expire at the end of this July, 2025. The implementation of the Extended Producer Responsibility (EPR) Regulation prompted Cascades to leave the business of providing recycling processing services to institutional and commercial customers, the OCDSB being the former.

Our tender bidding process for recyclables processing closed on Jun 18, 2025, with Cascades being the sole bidder. Furthermore they **only** bid on the processing of paper/cardboard recyclable materials. This will leave us without the ability to recycle mixed plastics, beverage containers, and aluminum/steel cans. This will be devastating to our environmental sustainability programs as waste diversion is very important to our staff and students who work very hard to recycle within their respective schools. In total, the OCDSB recycles

approximately **100,000 kgs** of mixed plastics, beverage containers, and aluminum/steel cans per school year. We are now left with little options to manage this waste stream, with much of it likely to end up in landfill. At the same time, this change in legislation also will put us in contravention of other regulations, O.Reg 102/94 and O.Reg 103/94.

Although we were initially concerned about the potential loss of our recycling program, there was hope as recently as last month. The Resource Productivity and Recovery Authority (RPRA) had indicated that schools would become eligible facilities for collection and processing services beginning in January 2026. However, with the proposed regulatory amendments, the RPRA now seeks to exclude schools entirely from access to these services. This means that, moving forward, the OCDSB will no longer be able to recycle mixed plastics, beverage containers, and aluminum/steel cans. Cascades remains the only company in our region with the capacity to process recyclable materials and, consequently, the only bidder on our recycling contract. Due to these changes, the OCDSB will be unable to recycle mixed plastics and metals.

While I support the underlying principles of the RPRA's approach—particularly the goal of holding producers accountable for the waste products they introduce—in this case, the proposed changes are having the opposite of their intended effect. Instead of advancing environmental stewardship, they are limiting recycling opportunities and undermining waste diversion efforts. As a result, a significant volume of recyclable materials will be redirected to landfill, which is a setback for both sustainability and school-driven environmental initiatives.

Sending school recycling to landfill is a direct and troubling consequence of this amendment, but the indirect impacts are equally significant. School recycling programs are designed to reflect at-home systems, helping students understand not only the importance of recycling but also how to do it correctly. These programs play a vital role in environmental education, fostering a culture of stewardship by embedding sustainable habits early in life. Eliminating access to recycling in schools risks undermining decades of progress in cultivating environmentally responsible and engaged citizens.

Should this amendment go into effect, it will be a disaster in regards to waste diversion and set us back years in Environmental Stewardship.

Sincerely,

Tom Thistle

Environmental Management Coordinator

Ottawa Carleton District School Board