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July 1, 2025

Marc Peverini
Resource Recovery Policy Branch
40 St. Clair Avenue West, 8th floor
Toronto, ON
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By email to: Marc.Peverini@ontario.ca

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

Dear Mr. Peverini,

I am writing on behalf of the Ottawa Catholic School Board (OCSB) to express our concerns regarding the proposed amendments to the Blue Box regulations. In reviewing the proposed changes, we feel that they will negatively impact our School Board, including staff and students.

Spanning over 2,790 square kilometers, the OCSB has 90 schools with an enrollment of over 50,000 students. Much like other Boards in the Province, the OCSB prides itself on its commitment to environmental stewardship and sustainability. To meet these commitments, the OCSB currently offers a “dual stream” recycling program where we collect and recycle both black (fibre) and blue (metal, glass, plastic) bins.

In the Ottawa region, there is only one company available to process our recyclable material, Cascades Recovery+. Until recently, both of our recycling streams were hauled to their facility for processing and sale on the commodities markets. However, our current contract with Cascades Recovery+ expires at the end of July 2025. It is our understanding that the implementation of the Extended Producer Responsibility (EPR) Regulation prompted Cascades to leave the business of providing metal/glass/plastic recycling processing services to institutional and commercial customers. Consequently, they did not bid on the “blue box” portion of the recycling tender. The outcome of Cascades+ decision is that the OCSB (and other coterminous boards within the City of Ottawa) are no longer able to offer blue-bin recycling at our schools.

This result does a disservice to both the students, staff, school community, city and by extension the Province. School recycling programs mirror at-home recycling programs and educate students not only about the importance of recycling, but what items are actually recyclable.

The idea is to embed environmental stewardship practices within our youth so that they grow into responsible and caring citizens.

While there will be deep concerns about the loss of our recycling program, as of last month there was still light at the end of the tunnel as the RPRA had schools becoming eligible facilities to receive collection and processing services starting in January, 2026. **However, with these proposed amendments changes, the RPRA seeks to remove schools entirely from access to service and collection meaning that moving forward indefinitely, the OCSB will not be able to recycle mixed plastics, beverage containers, and aluminum/steel cans.** Seeking out an alternative method is a non-starter since, as stated earlier, Cascades+ is the only company in our geographic area that has the means to process blue-bin recycling and as stated earlier they are not interested in continuing this practice.

School recycling being shipped to landfill is an example of a direct consequence of the proposed amendment. Local landfill spaces are already reaching maximum capacity. The City of Ottawa has explored and implemented alternative practices to extend the life of the city landfill. To retroactively increase landfill deposits via reducing recycling is poor optics.

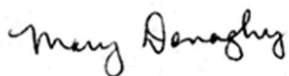
Excluding new schools from the blue box program will require the use of private waste haulers for individual school sites. This is not only cost-prohibitive but also potentially logistically unfeasible, particularly in a geographically large and growing region. Haulers may be unwilling to service isolated schools, leading to service gaps and increased operational burdens. Additionally, the timing of the proposed amendments does not allow school boards sufficient time to plan for budgetary or operational changes. Extending contracts is not always a simple or feasible solution.

In conclusion, we respectfully urge the Ministry to reconsider the proposed removal of the planned expansion of Blue Box services to additional schools. Including all schools—regardless of their location or construction date—is essential to ensure operational feasibility, consistency in environmental education, and a continued commitment to sustainability.

We look forward to hearing from you to discuss this further. Please contact Director Mary Donaghy at mary.donaghy@ocsb.ca

Thank you for the opportunity to provide feedback on this important matter.

Sincerely,

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

Mary Donaghy
Director of Education
Ottawa Catholic School Board

MD:sd