



January 9, 2025

Honourable Todd McCarthy, MPP
Minister of Public and Business Service Delivery and Procurement
5th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Dear Minister McCarthy,

Re: Advocacy for Recycling Services for Commercial Areas

As the Executive Director for the St. Catharines Downtown Association, representing over 700 small businesses and property owners within the Niagara Region's largest Business Improvement Area, I am writing to express our significant concerns regarding the exclusion of small businesses and non-eligible sources (e.g. places of worship) as eligible sources under the Province's new Blue Box Regulation (O. Reg. 391/21). We strongly urge the Province to reconsider its approach to ensure the continued inclusion of commercial areas in curbside collection recycling programs. At a minimum, Circular Materials and producers should be required to permit to co-mingling of residential and non-eligible source recyclables, as a solution.

Our vibrant downtown serves as the economic, cultural, and social hub of St. Catharines. Small businesses, non-profits, community organizations, and places of worship play a critical role in this ecosystem. The current regulation, however, threatens the efficiency and sustainability of waste diversion programs that these stakeholders rely on. Key concerns include:

1. **Inefficient Collection Methods** Post-2026, recyclables from non-eligible sources will be excluded from collection alongside residential materials, necessitating separate collection systems. This change will result in:
 - Increased greenhouse gas emissions from additional collection vehicles.
 - Higher operational costs, disproportionately impacting small businesses and non-profits.
 - Confusion as to whom is responsible for what.
2. **Increased Financial Burdens on Municipalities and Taxpayers**
 - Without producer-funded recycling for non-eligible sources, municipalities will face administrative challenges and rising costs to provide equitable services.
 - Limited tax revenue allocated for these programs may force businesses and organizations to absorb additional expenses, threatening their financial stability.
3. **Increased Waste to Landfills**

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- The exclusion of non-eligible sources may lead to more recyclable materials being disposed of as general waste, significantly increasing landfill volumes.
- 4. **Added Financial Pressures on Downtown Businesses** Our downtown businesses are critical to the local economy and already face significant financial pressures. It is our understanding that some Ontario municipalities have decided to discontinue curbside recycling collection from non-eligible sources, leaving these properties to retain a private hauler, drive the recyclables to a recycling depot or cease recycling practices all together. The added cost of private recycling services is simply not feasible for many of them, particularly in a challenging post-pandemic economic climate. Without access to affordable recycling solutions, we fear that these small businesses will be forced to send recyclable materials, including significant amounts of cardboard and paper, directly to landfill—undermining the very goal of increased recycling under the new regulation.
- 5. **Challenges Highlighted by Niagara Region**
 - Municipalities like Niagara Region have successfully managed comingled collection systems for years, ensuring cost-efficient recycling services for thousands of non-eligible properties.
 - The inability to add new non-eligible sources during the transition period creates barriers for businesses and community organizations seeking access to recycling services.
 - The post-2026 requirement to separate eligible and non-eligible materials introduces significant logistical challenges, including the need to negotiate higher-cost contracts or acquire new vehicles amidst supply delays.
 - Estimated collection costs for non-eligible sources are projected to increase by two to three times the current rates, undermining cost savings anticipated from the Blue Box transition.

Niagara Region has emphasized that it would be financially and environmentally advantageous for the Province to allow continued co-collection of eligible and non-eligible materials. By enabling municipalities to continue servicing non-eligible sources within the common collection system, the Province can support local economies, reduce environmental impacts, and maintain efficient recycling systems.

To address these challenges, we urge the Province to:

- Expand producer responsibility to include non-eligible sources currently serviced by municipal collection systems.
- Require Circular Materials and producers to allow comingled collection of eligible and non-eligible materials to maintain operational efficiency and environmental benefits.
- Engage with municipalities, businesses, and community organizations to develop a sustainable, inclusive approach to recycling services.

On behalf of the businesses and property owners in downtown St. Catharines, I ask for your support in advocating for these critical changes to the Blue Box Regulation. Together, we can

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ensure that recycling programs remain equitable, efficient, and environmentally responsible for all Ontarians.

Thank you for your attention to this matter. I would be happy to meet with you or provide additional information to further discuss this issue and its implications for our community.

Yours truly,

Rachel Braithwaite

Rachel Braithwaite
Executive Director
St Catharines Downtown Association

CC:
Premier Doug Ford
Sam Oosterhoff, MPP, Niagara West
Jeff Burch, MPP, Niagara Centre
Wayne Gates, MPP, Niagara Falls
Jennifer (Jennie) Stevens, MPP, St. Catharines
Jim Bradley, Chair Niagara Region
Mat Siscoe, Mayor, St Catharines

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