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Resource Recovery Policy Branch
Ministry of the Environment, Conservation and Parks
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July 4, 2025

RE: Amendments to the Blue Box Regulation – ERO 025-0009

Dear Mr. Peverini,

On behalf of the Mayors and Regional Chairs of Ontario (MARCO), I am writing with feedback regarding proposed amendments to the Blue Box Regulation (O. Reg. 321/91) under the *Resource Recovery and Circular Economy Act, 2016* - ERO 025-0009

As part of the amendments under consideration, we urge the Ministry to **enable co-mingling of residential and non-eligible source recyclables**—in other words, collection of recyclable materials on the same truck. This common-sense change would cut inefficiency and duplication, help Ontario’s small businesses, reduce costs for taxpayers, and protect the environment, without requiring new spending by the Province.

We are pleased that the Ministry has already identified this change as an area for consideration in the current consultation. We support and echo similar calls from member municipalities and the business community, including the Ontario Business Improvement Area Association.

Background

The Blue Box regulation (O. Reg. 391/21) shifts responsibility for funding and operating the residential Blue Box Program from municipalities to producers of paper, packaging, and similar products.

The current regulation requires producers to collect materials from eligible sources, including residences, multi-residential buildings, schools, and non-profit long-term care and retirement homes.

However, it excludes “non-eligible” sources that are currently receiving Blue Box curbside collection services, such as small- to medium-sized businesses, non-profit organizations, community buildings such as arenas and libraries, and daycares, churches and other places of worship. In areas with mixed residential and commercial operations, such as downtowns, eligible and non-eligible sources may be on the same street, or even in the same building.

During the transition period, municipalities have been allowed to collect recyclables from non-eligible sources on the same truck as the residential materials—but after January 1, 2026, this efficient practice will be prohibited.

This will mean higher costs for taxpayers, increased burdens on small businesses, and worse environmental outcomes, including more greenhouse gas and more waste in landfills.

Key Concerns

- **Higher Costs for Taxpayers:** Maintaining collection from non-eligible sources will mean increased costs and logistical challenges for municipalities.
 - Challenges and inefficiencies may include duplicate routes, negotiating higher-cost contracts, acquiring new vehicles amidst supply delays, or creating administrative mechanisms for separate billing.
 - For Niagara Region, maintaining collection from non-eligible sources will increase costs by 136%.
- Some municipalities will discontinue collecting recyclables from non-eligible sources, starting January 1, 2026.
- **Increased Greenhouse Gas Emissions** Many non-eligible sources are located on routes currently serving eligible sources and in areas with mixed residential and commercial use, such as downtowns. That means more collection trucks on the road driving the same route, which means increased greenhouse gas emissions.
- **Pressure on Small Businesses:** In areas where municipalities are forced to discontinue curbside recycling collection from non-eligible sources, businesses will have to retain a private hauler or drive recyclables to a recycling depot. That means more pressure on businesses already impacted by US tariffs and economic uncertainty.
- **More Waste in Landfills:** Businesses and non-eligible sources unable to pay or arrange for private collection may send recyclable materials directly to landfill, including significant amounts of cardboard and paper—undermining the goal of increased recycling.

Solution

As the Province considers its amendments to the Blue Box regulation, we respectfully request that Province include solutions to drive efficiency by **requiring Producer Responsibility Organizations (PROs) to allow for co-mingling of residential and non-eligible source recyclables**, with a fair pricing structure that ensures affordability for taxpayers.

This change would have multiple benefits without new costs to the Province, by:

- Lowering operating costs for municipalities,
- Reducing greenhouse gas emissions by eliminating duplicate collection runs,
- Maintaining recycling access for businesses and organizations that have participated in municipal programs for decades,

- Bridging regulatory gaps that exclude established participants,
- Promoting recycling participation and avoid environmental impacts.

Working Together

MARCO brings together the Chairs of regional municipalities and Mayors of large, single-tier cities, representing over 10.6 million Ontarians and delivering essential services that touch every stage of people's lives.

We would welcome an opportunity to discuss how this solution could benefit small businesses, taxpayers, and the environment. If you or your staff have questions, please contact Executive Director Margot Cragg at info@marcontario.ca or 519-505-2861.

Thank you for your thoughtful consideration of this important matter. We look forward to working with you to make life better for Ontarians.

Sincerely,



Chair Karen Redman

Chair, MARCO

Chair, Region of Waterloo

Cc: Hon. Todd McCarthy, Minister of the Environment, Conservation and Parks