

July 4, 2025

Marc Peverini
Resource Recovery Policy Branch
Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West, 8th Floor
Toronto, ON M4V 1M2

Re: Amendments to the Blue Box Regulation - ERO 025-0009

Dear Mr. Peverini,

Ontario Greenhouse Vegetable Growers (OGVG) welcome the government's efforts to amend the *Blue Box Regulation* (O. Reg. 391/21) under the *Resource Recovery and Circular Economy Act, 2016*, to better align with the realities faced by producers, including brand holders, importers, and retailers. The framework for managing end-of-life collection of packaging has experienced cost increases that are creating real affordability concerns throughout the agrifood value chain. Of particular concern are the added costs for necessary packaging for food safety purposes or to ensure the viability of the product. Maintaining food safety, cost competitiveness and affordability are pressing concerns for the greenhouse vegetable sector, which has seen 5% annual growth over the last decade and now contributes \$2.7 billion in farmgate revenues. OGVG represents 170 farming families managing over 4,300 acres of tomatoes, peppers, and cucumbers, supporting more than 32,000 high-quality jobs across Ontario's agri-food value chain.

Many farms and brand owners bear indirect financial pressures from upstream partners who pass down compliance costs. Without accompanying adjustments to exemption thresholds, producer definitions, or more transparent Producer Responsibility Organization (PRO) pricing structures, the regulatory burden continues to grow. Other jurisdictions, such as California, have exempted the food industry from package recycling and content requirements, ensuring competitiveness while recognizing the importance of food safety, quality, and prevention of waste. Furthermore, the contamination of packaging preventing recycling must be more specifically addressed to prevent significant costs imposed on producers for limited gains in diversion.

In this regard, we share the concerns outlined in the submission of the Ontario Fruit and Vegetable Growers Association (OFVGA), namely:

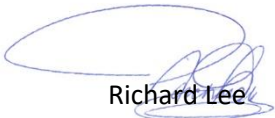
- **Escalating compliance costs**, including administration and PRO pricing, can far exceed annual inflation and outpace farm revenue growth risking farm viability and eventually passing costs to consumers in raised grocery prices.
- **Inadequate exemption criteria**, which fail to account for diverse farm revenue models and partial packaging responsibility.
- **International and interprovincial inconsistencies**, including nearly impossible tracking and

reporting of packaging for interprovincial trade, leading to needless burden, duplication, and ultimately inaccuracy in reporting, despite best efforts.

- **Limited practical options for sustainable packaging**, especially where food safety, freshness, and handling must be prioritized. Without incentives to switch over alternative packages that maintain food quality, growers are reluctant to switch from established products.

Continued cost uncertainty and administrative complexity under the current regulation threatens future investment and competitiveness. We support the direction of these amendments but urge the government to further refine the regulation to ensure flexibility, fairness, and accountability across the supply chain, especially highlighted by the comments of OFVGA. Without viable alternatives, appropriate incentives, or practical tracking mechanisms, these changes risk shifting more burden onto stakeholders without meaningfully advancing the regulation's environmental objectives. We further urge the consideration of a full exemption for direct food contact packaging required to maintain food security and would welcome the opportunity to work collaboratively on these improvements.

Sincerely,



Richard Lee
Executive Director