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**SENT VIA:** [Environmental Registry of Ontario](#)

Marc Peverini  
Resource Recovery Policy Branch  
40 St. Clair Avenue West  
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Toronto, ON M4V 1M2

Dear Mr. Peverini:

**Re: City of Toronto's comments on proposed amendments to the Resource Recovery and Circular Economy Act, 2016 (ERO # 025-0536)**

The City of Toronto (the City) is pleased to have the opportunity to comment on the proposals to amend the Resource Recovery and Circular Economy Act, 2016 (RRCEA), which were posted on the Environmental Registry of Ontario on June 4, 2025.

In developing these comments, City staff also reviewed Schedule 20 (Resource Recovery and Circular Economy Act, 2016) of Bill 46, Protect Ontario by Cutting Red Tape Act, 2025<sup>1</sup>.

## **1.0 Gathering information to assess system effectiveness and plan future changes**

### **1.1 Position**

The City supports an amendment to the RRCEA that would allow the Minister of the Environment, Conservation and Parks (the Minister) to order the Resource Productivity and Recovery Authority (RPRA) to gather information related to the design, operation and costs associated with the Blue Box program in Ontario.

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<sup>1</sup> [Bill 46, Protect Ontario by Cutting Red Tape Act, 2025](#)

## 1.2 Recommendation

The City agrees that the Province needs to be able to acquire this information in order to be able to assess the effectiveness of the regulation, as long as this information is being used not just to maintain the Blue Box program, but to expand in a manner consistent with the Province's commitment in 2021 to improve recycling by making producers of products and packaging fully responsible for the cost and operation of the Blue Box program that will manage the materials they introduce into the marketplace.

The City requests that the proposal be expanded to allow the Minister to order the collection and publication of data by RPRA on the Blue Box recovery rate in each municipality. This would be consistent with the stated rationale in Schedule 20 (Resource Recovery and Circular Economy Act, 2016) of Bill 46 that the Minister may require the collection of information "for the purposes of assessing the effectiveness of this Act and the regulations and developing and evaluating policy respecting resource recovery and waste reduction".

Currently municipalities do not have access to this data, which is a key metric that helps in planning for residual waste management, including landfills and facilities planning. Given the recent statements made by the Province regarding the critical shortage of landfill capacity in Ontario<sup>2</sup>, the City feels that the publication of this information, with any commercially sensitive information redacted, is crucial to support evidence-based waste diversion and residual waste management planning.

Through the City's participation in discussions with other Ontario municipalities, we have heard that other municipalities would also be interested in working with the Province to create a process to allow access to the Blue Box recovery rate in each municipality.

## 2.0 Increasing transparency on costs and system data

### 2.1 Position

As a municipal producer, the City supports an amendment to the RRCEA that would allow the Minister to create regulations that would require persons or organizations specified in the regulations to provide information (as specified in the regulation) to RPRA, the public, or others that are party to an agreement under the RRCEA.

### 2.2 Recommendation

The City agrees with the goals, stated in the proposal, of any regulations that would be put in place:

- Provide producers with better access to information so that they can better compare quotes and make an informed decision when procuring a Producer Responsibility Organization (PRO).

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<sup>2</sup> [Ontario Legislature Hansard May 14, 2025](#)

- Provide producers with information so that they can better understand the cost drivers and invoices from their PRO and the cost drivers for what they are paying.
- Provide RPRA with improved annual reporting on system design, operation, and costs.

The City would also be interested in the Province using this new regulation making power to allow producers to procure the services of more than one PRO when producers need to manage different materials specified in the Blue Box regulation. The City is concerned that service agreements may not allow a producer to sign with multiple PROs for different materials, even if an individual producer determines that this approach is the most cost effective.

The City requests that prior to any regulations being put in place, the Province undertake a full and transparent consultation process with all stakeholders, including municipal producers and the public.

### 3.0 Maintaining collection for small businesses

#### 2.1 Position

The City supports the proposal to amend the RRCEA to allow for regulations to be created that would require PROs to enter into negotiations with municipalities or other specified entities for the provision of Blue Box collection services to small businesses, at municipal expense.

#### 3.2 Recommendation

The City requests that prior to any regulations being put in place, the Province undertake a full and transparent consultation process with all stakeholders, including municipalities and the public. This will help ensure that any negotiations are based on full cost transparency for all involved parties.

Should you have any questions regarding our submission, please contact Charlotte Ueta, Acting Director of Policy, Planning & Outreach, Solid Waste Management Services, by email at [Charlotte.Ueta@toronto.ca](mailto:Charlotte.Ueta@toronto.ca) or by telephone at 416-392-8506.

Yours truly,



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James Nowlan  
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MK/ts

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