



July 21, 2025

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

Sent: via online ERO Portal

**Re: Amendments to the *Resource Recovery and Circular Economy Act, 2016*.
ERO number 025-0536**

The Association of Plastic Recyclers (APR) appreciates the opportunity to provide input to the consultation for amendments to the *Resource Recovery and Circular Economy Act, 2016* (RRCEA).

Introduction to APR

[The Association of Plastics Recyclers](#) (APR) is an international non-profit and the only North American organization focused exclusively on improving recycling for plastics. Our goal is to recycle more plastics to reduce waste and move towards a circular economy. Our membership includes over 300 companies across North America representing over 80% of the plastics recycling processing capacity in Canada and the US, including leading Canadian plastics recyclers, converters and resin manufacturers. This extensive membership provides APR with a strong system-wide understanding of current plastics recycling practices and the innovations underway.

We are currently engaged with the Canada Plastics Pact and key Producer Responsibility Organizations in Canada to advance a consistent North American approach to plastics circularity and enable common learnings through joint projects and the implementation of extended producer responsibility programs in Canadian provinces and US states.

APR has developed globally recognized programs both on recyclability and recycled content: the APR Design® Guide for Plastics Recyclability, which defines recycling stream compatibility against specific criteria and testing protocols, and the APR Post-Consumer Resin (PCR) Certification program, which validates post-consumer recycled content (flakes or pellets). Both of these resources are being integrated into the North American landscape and are critical tools to help meet Canada's goals.

Overview and Recommendations

APR commends the Ontario Government's commitment to enacting "*changes to the Resource Recovery and Circular Economy Act that would strengthen Ontario's blue box program by improving transparency, cost disclosure, and collection of materials*" in order "*to be more responsive to the needs of businesses and identify savings to help drive blue box costs down.*"

Ontario's competitive model for Producer Responsibility Organizations (PROs) has led to a growing concern amongst plastics recyclers that, in some cases, less data is currently available to recyclers and other value-chain operators to make informed business decisions, when compared to the previous Stewardship Ontario program. Thus, the need for greater transparency on costs and system data is not simply a concern for Producers (as outlined in the consultation proposal) but also critical for plastics reclaimers/recyclers who provide critical services to meet the Blue Box targets.

While APR understands that sensitive individual business information should be shielded in a competitive market, it is critical that sufficient information be made available so that recyclers can effectively plan for evolving business conditions. As such, APR encourages the Government to equip the Resource Productivity and Recovery Authority (RPPRA) with the authorities necessary to collect information and agglomerate data in a manner that allows for effective system planning across the value-chain.

As Ontario's Extended Producer Responsibility program for the Blue Box rolls out over years, it is expected that substantially more and more plastics will be collected and processed. This will require large-scale investments in operating equipment and facilities at current plastics recyclers, as well as potential growth for new operations. These private sector business investments depend upon the available data around program goals, packaging volumes, collection rates, and other key data points to evaluate where, when, and how to expand operations.

In this context, there are 5 key data points that APR has identified that are critical to enable continuous improvements in costs and system operations by reclaimers/recyclers:

1. On a quarterly basis, confirm volumes of materials to be added to the market to be recycled and identify anticipated increases/decreases in those volumes over the coming years, such as 1, 3, and 5-year time frames.
 - a. This is critical to help recyclers be better informed about evolving packaging trends and when it may be economically prudent to scale-up infrastructure investments to meet growing demand and changes in material composition.
2. Provide more nuanced information about the types of materials available. Currently, the recovery targets are simply defined as 'rigid plastics' and 'flexible plastics' and initial reporting by the PROs uses these categories. However, recyclers often have specialized

feedstocks within those categories, such as processing only PET rigid plastics and not all rigid plastics. More granular data on market analysis will better inform private sector investments. We are not suggesting that the terms for the regulated recovery targets be changed. However, from a data collection and market perspective, there is significant value in refining the information when reporting to RPRA to include specific commodity categories that were previously available under Stewardship Ontario. For example, categories could include:

- a. PET Reported and/or Calculated Marketed
 - b. HDPE Reported and/or Calculated Marketed
 - c. Rigid Polypropylene Reported and/or Calculated Marketed
 - d. Plastic Film and Flexibles Reported and/or Calculated Marketed
 - i. Low-Density Polyethylene/ Linear Low-Density Polyethylene
 - ii. Polypropylene
 - e. Polystyrene Reported and/or Calculated Marketed
 - f. Mixed Plastic Reported and/or Calculated Marketed

3. Confirm percentages of yield losses across the system from: a) collection/hauling to b) sortation/material recovery facilities/pre-conditioning facilities to c) recycling into commodity-ready recycled plastic. Multiple measurement points are important for two reasons:
 - a. These measurement points will help identify areas where there might be an opportunity to increase yields through improvements in technology and/or processes. Each step requires different actions to improve performance.
 - b. It will ensure that any increases in recovery targets that are developed are reasonably ambitious and take into account typical operational losses across the system at that time. The province has not yet provided full details into how the recovery targets will be calculated. It is critical to understand the current performance rates to evaluate what are reasonable targets for the program.

4. PROs should provide RPRA with a high-level summary of overall costs of their system operations for the following categories: a) Administration, b) Hauling/Collection, c) Sortation (including secondary sortation), d) Recycling, and e) Other. At a minimum, this information can be provided as a percentage of overall costs agglomerated across all PROs in order to address any concerns about competitive information. In addition, RPRA should report on Ontario's EPR system costs in comparison to other provinces.
 - a. This information will help identify where the bulk of costs are incurred and help galvanize efforts to introduce greater efficiencies, where possible.

5. Evaluate the role of inflation in driving system costs, using 2019 as a baseline. Prices for all services and products have increased substantially over the past several years. There is a need to distinguish between overall inflation costs that are driving up the costs of recycling compared to the cost impacts of the Blue Box program implementation. Simply maintaining the status quo today would cost more, and the

province does not have control over macroeconomic trends impacting the costs of labour, trucks, recycling carts, insurance, and more.

- a. This information will help distinguish between inflationary costs and where program costs have increased more specifically due to Blue Box regulations and how those specific costs may be addressed through regulatory changes.

Plastic recyclers are committed to improving recycling rates across Ontario and are already making substantial investments in new services, facilities, and more to scale up operations. We encourage the Government to consider the impacts of regulatory changes upon all the value-chain partners involved with the Blue Box implementation.

Thank you for the opportunity to provide feedback. We look forward to continuing our dialogue with you.

Regards,

A handwritten signature in black ink that reads "Kate Bailey".

Kate Bailey
Chief Policy Officer

A handwritten signature in blue ink that reads "E. Mantagaris".

Elena Mantagaris
Senior Advisor, Canadian Initiatives