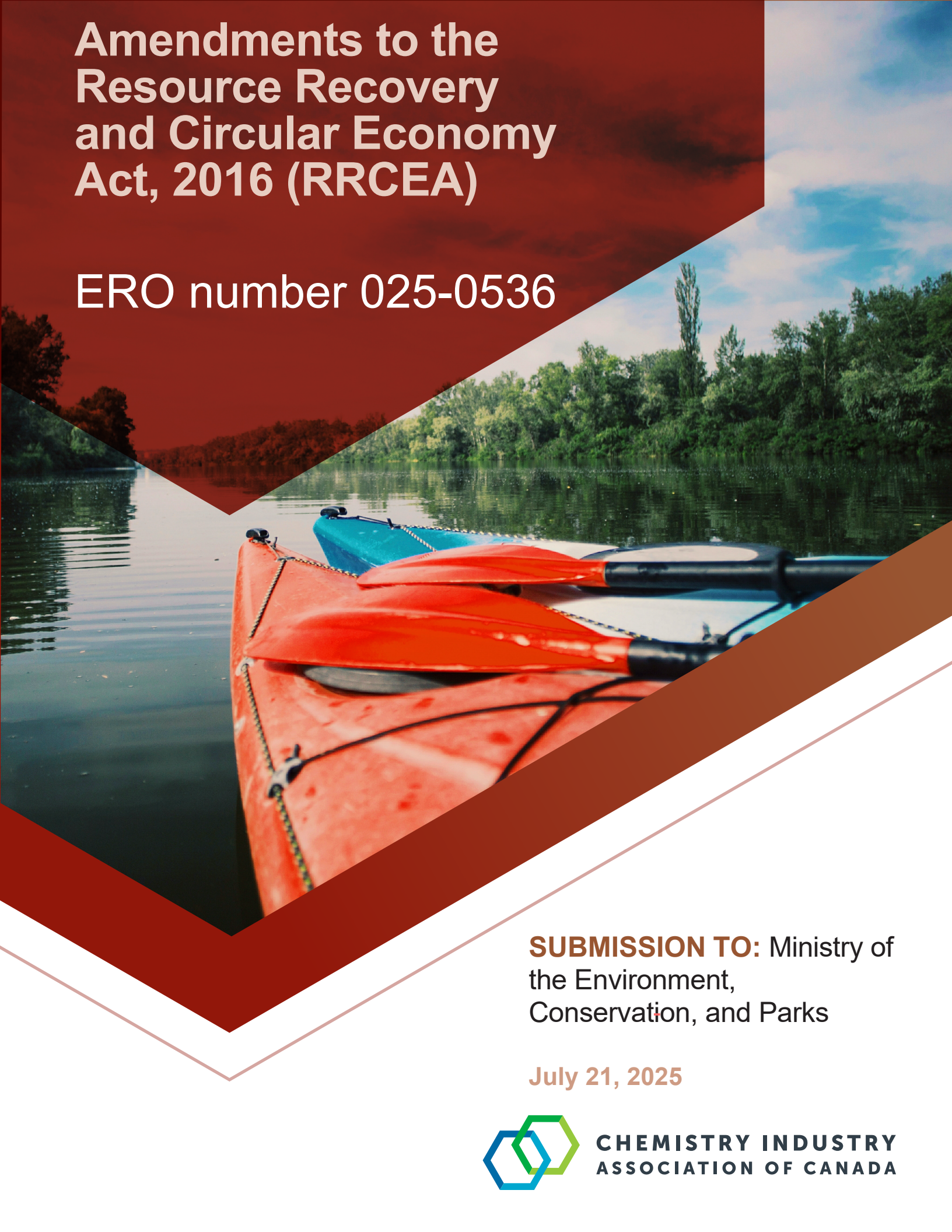


Amendments to the Resource Recovery and Circular Economy Act, 2016 (RRCEA)

ERO number 025-0536



SUBMISSION TO: Ministry of
the Environment,
Conservation, and Parks

July 21, 2025



**CHEMISTRY INDUSTRY
ASSOCIATION OF CANADA**

July 21, 2025

To:

Marc Peverini

Senior Policy Advisor, Resource Recovery Policy Branch

Ontario Ministry of the Environment, Conservation and Parks

Email: marc.peverini@ontario.ca

RE: ERO Notice 025-0536 – Proposed Amendments to the Resource Recovery and Circular Economy Act, 2016

Dear Mr. Peverini,

The Chemistry Industry Association of Canada (CIAC) welcomes the opportunity to provide comments on the proposed legislative amendments to the [Resource Recovery and Circular Economy Act, 2016 \(RRCEA\)](#), published on June 4, 2025.

CIAC represents leading plastic resin producers, converters, recyclers, and brand owners across Canada who are committed to advancing a circular economy through investment, design innovation, and regulatory clarity. We support a modernized and effective producer responsibility framework in Ontario that provides transparency and cost discipline to producers, while incentivizing additional investment through performance accountability.

Key Amendments

- **Accountability to Producers:** CIAC supports enabling the Minister to direct the Resource Productivity and Recovery Authority (RPRA) to collect or verify operational and cost data, in principle. However, we caution that any expansion of RPRA's powers must be carefully scoped to avoid unnecessary administrative duplication, cost escalation, and red tape. Ontario producers are already bearing increasing compliance cost with little evidence that these lead to better diversion outcomes. We support the need for better system data, particularly on actual recycling performance, but urge the Ministry to ensure any new authorities are focused, proportional, and aligned with existing reporting channels to avoid more inefficiencies and rising costs. Importantly, this data should not only reflect how much is being spent, but also where and how — so that it can be used to evaluate whether more cost-effective methods could achieve the same outcomes. This insight should ultimately inform regulatory changes that reduce unnecessary administrative costs in the system.
- **Ministerial Authority to Direct Data Collection:** CIAC supports enabling the Minister to direct the Resource Productivity and Recovery Authority (RPRA) to collect and verify operational and cost data. This is a necessary step toward improving system transparency, especially in a landscape where PROs carry out nearly all operational responsibilities on behalf of producers. Enhanced data access will allow the Ministry to make better policy decisions and will help producers ensure that the system is functioning efficiently and fairly. However, this must be clearly tied to specific outcomes or policy objectives that improve program performance, cost-efficiency, and regulatory clarity.

CIAC supports the Ministry's efforts to strengthen Ontario's legislative framework for resource recovery. These amendments recognize the growing complexity of producer responsibility programs and the need for better data, oversight, and cost control mechanisms. As with the concurrent Blue Box consultation, we encourage the Ministry to balance transparency and accountability with flexibility, cost predictability, and support for innovation.

We look forward to working with the Ministry as these amendments are refined and implemented.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Mirtchev', with a long horizontal flourish extending to the right.

Peter Mirtchev, Ph.D.
Policy Manager, Plastics