

July 2, 2025

Ministry of the Environment, Conservation and Parks  
5th Floor, 777 Bay Street  
Toronto, Ontario M7A 2J3

**Re: Amendments to the Blue Box Regulation**

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Thank you for the opportunity to comment on the proposed amendments to Ontario's *Blue Box Regulation, 2021* 392/91. The City of Richmond Hill remains a committed partner in advancing a circular economy and believes that it is important that the regulations achieve their intended outcomes and purpose. The Public Works Operations Division of the City of Richmond Hill recommend the Ministry reconsider aspects of the proposed amendments, as outlined in this response.

**ITEM 1: Delay Recovery Targets for Select Material Categories**

Richmond Hill Staff Comment:

- By delaying the recovery targets, the City of Richmond Hill is concerned that this will in turn delay improved environmental outcomes. The City suggest that the recovery targets should remain on schedule or follow a phased approach (e.g., 70% by 2027, 85% by 2031), with mandatory annual reporting and third-party verification to ensure continuous progress and accountability.

**ITEM 2: Remove planned expansion for multi-residential buildings, schools, and specified long-term care homes and retirement homes**

Richmond Hill Staff Comments:

- The City is very concerned about this proposed amendment as removing planned expansion to new multi-residential buildings is problematic. Richmond Hill currently provides municipal waste collection of garbage, organics and recycling to approx. 110 multi-residential buildings and onboards 1-5 new buildings (250-1250 units) to municipal collection services each year. The City has many concerns with not offering recycling service to new buildings, which include:
  - Inequity created amongst residents living in multi-res buildings within the City (existing buildings receive recycling service and new ones would not) as well as an inequity between residents in multi-res buildings and those living in single-family homes.
  - Expecting new buildings to procure private collection for 1 of 3 streams is impractical and unlikely
  - May result in recyclable material being disposed of as garbage (landfill/EFW) and managed at municipalities' expense.
  - Completely removing new MR buildings from the regulation does not align with the stated goal of focusing on residential material as these are all residential homes.
  - Collection of recycling from multi-res has been removed from municipal waste contracts and is cost prohibitive for municipalities to take on, especially for just a few new stops per year, economies of scale are lost.

- Richmond Hill believes that collecting recycling from schools, specified long-term care homes and retirement homes creates a consistent service level across the province and the ability to capture a significant amount of recyclable material that is potentially being sent to landfill currently – removing this requirement is a step backwards environmentally and towards creating a uniform provincial system.
- The City supports providing recycling collection in all schools in Ontario and believes it's a fundamental component in teaching students to divert/separate their waste correctly and will improve recycling in the home as well.

#### **ITEM 4: Remove Expansion of Public Space Collection**

##### **Richmond Hill Staff Comments:**

- The City believes that all public space containers that are currently collected along a residential route should be maintained in 2026 and collected by producers.
- At a minimum, the formula currently in the regulation for the number of PSRs per capita should be maintained.
- Richmond Hill understands that it may be more suitable for municipalities to collect from public space recycling containers (i.e. within parks) however, compensation should be provided to municipalities for collecting on behalf of producers.
- Removing this obligation from the regulation represents a missed opportunity to:
  - Capture producer-supplied recyclables in high-traffic areas.
  - Reinforce consistent environmental messaging and public participation in waste diversion.
  - Alleviate the cost burden on municipalities, which will otherwise remain responsible for collection and disposal.

#### **ITEM 5: Reduce and Delay Flexible Plastic Recovery Targets**

##### **Richmond Hill Staff Comments:**

- Reducing and delaying the flexible plastic recovery target delays improved environmental outcomes.
- Maintaining the target as originally set out in the regulation provides an incentive to producers to prioritize other packaging types that are more easily recyclable and move away from this type of material – lowering the target encourages producers to continue to use flexible plastic.

#### **ITEM 7: Consider the best ways to ensure collected materials are sent for processing**

##### **Richmond Hill Staff Comment:**

- “Best efforts” are not sufficient to drive diversion until 2031 and the regulation should be amended to clarify that all collected blue box material must be sent to a registered processor and not directly to landfill.

#### **ITEM 8: Clarify definition of a facility**

##### **Richmond Hill Staff Comments:**

- The City suggests that “multi-residential building” be added as a separately defined term which would include buildings with 6 or more residential units as well as set of buildings containing townhouse units where waste cannot be collected curbside (i.e. private development of stacked townhouses collected with front-end containers).
- Lumping multi-residential building into the term “facility” as done in O. Reg. 103/94 implies this is a type of ICI building when in fact it is a residential source – this distinction should be made more clear.

**ITEM 11: Update Timelines for Providing Blue Box Services**

**Richmond Hill Staff Comments:**

- The City agrees that timelines should be included in the regulation.
- The City recommends that commencement of service for residences and MR buildings should be based on occupancy levels (i.e. 70%) and should align with when the municipality will begin collecting organics and garbage.

**ITEM 12: Provide More Flexibility on Printed Promotion and Education Materials**

**Richmond Hill Staff Comment:**

- The City suggests that the P&E materials provided by producers should match what the municipality is providing for the other waste streams, if a calendar is being mailed out then blue box information should be provided in the same way (in the same calendar or a separate one).

**Areas for Future Consideration**

The City of Richmond Hill supports the areas for future consideration as described as these will drive transparency and efficiency in the system. Specific comments include the following:

**Increasing transparency on costs and system data**

- The City of Richmond Hill supports the government requiring PROs to provide more information to producers and requiring improved annual reporting on system design, operation, and costs to RPRA. This will increase transparency and ensure producers know and understand what they are paying for when they sign on with a PRO.

**Maintaining collection for small businesses**

- Richmond Hill suggests that small businesses that were historically collected along residential routes should continue to be collected by producers and charge municipalities back for providing this service on their behalf, at a reasonable cost.
- Reduces duplication of services being provided, reduces the number of waste collection vehicles on the roads and avoids unnecessary emissions caused by requiring dedicated routes and separate trucks.

Sincerely,



Vlad Gaiu  
Manager, Energy and Waste  
Community Services - Public Works Operations