



July 2, 2025

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

Re: Amendments to the Resource Recovery and Circular Economy Act, 2016

Thank you for the opportunity to comment on the proposed amendments to Resource Recovery and Circular Economy Act, 2016. The City of Richmond Hill remains a committed partner in advancing a circular economy and believes that it is important that the RRCEA and regulations achieve their intended outcomes and purpose. The Public Works Operations Division of the City of Richmond Hill supports the proposed amendments to the RRCEA and has outlined key aspects below.

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 supports the proposed changes and 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.
- This approach 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,

A handwritten signature in black ink that reads "Vlad Gaiu".

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