



July 4, 2025

Ministry of the Environment, Conservation and Parks
77 Wellesley Street West
Ferguson Block, 11th Floor
Toronto, ON
M7A 2T5

To Whom It May Concern,

I am writing to you on behalf of Ecosource to express our concerns regarding the proposed amendments to O. Reg. 391/21 (Blue Box Regulation).

Founded in 1979, Ecosource is a leading environmental charity in Peel Region engaging over 20,000 residents in high-quality environmental education annually. Waste reduction education is one of our core programs, delivering curriculum-connected classroom workshops to thousands of students in the Peel District School Board and the Dufferin-Peel Catholic District School Board. These workshops address contemporary waste issues and support regional waste management objectives.

We appreciate the Ministry's commitment to transitioning Ontario toward an Extended Producer Responsibility (EPR) framework. We recognize the significant potential of EPR to improve packaging sustainability, reduce costs for municipalities and taxpayers, and increase diversion and recycling rates, particularly when supported by enforceable, government-regulated targets.

However, we are concerned that the proposed amendments to the Blue Box Regulation risk undermining these goals. If implemented as proposed, the amendments could limit the effectiveness of the EPR model and have a detrimental impact on waste management, environmental outcomes, and public trust in the system. Specifically, we would like to highlight our concerns in the following areas:

1. Weakened Recycling Standards and Delayed Targets

- The proposed reduction of the recovery target for flexible plastics from 25% to 5% and its delay by five years reduces both the urgency and the accountability necessary to address problematic packaging.
- Allowing incineration (or “energy recovery”) to count toward recycling targets dilutes the core purpose of EPR. This risks incentivizing burning over redesign, reuse, or true recycling, while raising serious environmental and health concerns.

2. Reduced Service Coverage

- Excluding key areas such as institutional, commercial, and industrial (IC&I) settings, public spaces, and multi-residential properties could leave up to 60-70% of packaging waste unmanaged.
- This significantly limits access to recycling for residents in rural and remote areas, tenants in apartment buildings, seniors' homes, schools, and users of parks and public facilities, creating a fragmented and inequitable system.

3. Public Health and Environmental Risks

- Delaying full implementation of collection and recovery targets to 2031, combined with the inclusion of incineration as a recovery method, may lead to increased plastic burning, litter, landfill use, and air pollution.
- The continued exclusion of non-alcoholic beverage containers from Ontario's deposit-return system and lack of "away-from-home" collection will result in more recyclable waste polluting the environment each year.

4. Negative Impacts on the Education Sector

- Eliminating the requirement to provide recycling services to schools not currently covered by municipal waste collection is a missed opportunity. Schools generate substantial waste - an estimated 11,680 kg per student per school year (EcoSchools Canada, 2021) - and should be integral to any comprehensive recycling strategy.
- Excluding new schools from the blue box program will require the use of private waste haulers for individual school sites. This is not only cost-prohibitive but also potentially logistically unfeasible, particularly in a geographically large and growing region. Haulers may be unwilling to service isolated schools, leading to service gaps and increased operational burdens.
- Requiring schools to hire private haulers could lead to inconsistencies between school and household recycling systems. Such inconsistencies would have a detrimental impact on environmental education and confuse students, limiting efforts to instill long-term recycling habits.
- Removing the requirement for printed educational materials compromises outreach, especially among populations with limited digital access. Education must be ongoing, consistent, and targeted - not only to inform residents of changes in accepted materials or collection processes, but also to continuously address common sorting mistakes that contribute to contamination. This change risks higher contamination rates, reduced participation, and ultimately, impacts the achievement of recycling and diversion targets.
- Ontario schools serve over 2 million students (Ministry of Education, 2024), offering a powerful platform for promoting recycling, waste diversion, and sustainability. The lessons learned in schools extend to students' homes, reinforcing environmental education and fostering sustainable habits. The proposed amendments risk undermining these efforts, not only within schools but across communities.

We remain supportive of the transition to extended producer responsibility and see it as a powerful tool to increase waste diversion and modernize service delivery. However, for EPR to succeed, the provincial government must uphold strong, enforceable standards and inclusive service requirements that align with the core goals of a circular economy: waste reduction, resource recycling, and environmental protection.

Thank you for considering our comments. We welcome the opportunity to engage further and would be pleased to provide additional information or clarification as needed.

Sincerely,

A handwritten signature in dark ink, appearing to read "BMcKee", with a stylized, cursive script.

Britt McKee
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