



The Municipality of
SOUTH DUNDAS



**NORTH
STORMONT**
A good place to grow



July 4, 2025

**Re: Proposed Amendments to Blue Box Regulation, O. Reg. 391/21
ERO #025-0009**

The Stormont, Dundas and Glengarry Regional Waste Working Group represents six local municipalities who were responsible for the delivery of the curbside blue box program prior to our collective transition to extended producer responsibility on January 1, 2025.

Located in eastern Ontario, within the United Counties of Stormont, Dundas, and Glengarry, the six local municipalities represent a rural population of more than 65,000 people and include the:

- Township of North Dundas
- Municipality of South Dundas
- Township of North Stormont
- Township of South Stormont
- Township of North Glengarry
- Township of South Glengarry

The Stormont, Dundas and Glengarry Regional Waste Working Group has consolidated comments on the proposed amendments to the Ontario Regulation 391/21 (Blue Box) and are providing them jointly as attached. The Working Group thanks the Ministry of Environment, Conservation, and Parks for the opportunity to comment and welcome any follow up questions. The Working Group can be reached through our Working Group administrator, Matt Brownell mbrownell@sdgcounties.ca, or by contacting the undersigned at smcdonald@southglengarry.com.

Kindest Regards,

Sarah McDonald, P. Eng.

Chair, Stormont Dundas and Glengarry Regional Waste Working Group
General Manager, Infrastructure Services, Township of South Glengarry

cc: SDG Regional Waste Management Working Group Members, Neighbouring Municipalities and First Nations
encl. Comments on Proposed Amendments to Blue Box Regulation

Stormont, Dundas, and Glengarry Regional Waste Working Group

Comments on Proposed Amendments to Blue Box Regulation

July 4, 2025

Maintaining Current Services

ITEM 1. Delay Recovery Targets for Select Material Categories

If the requirement for the Producers to make “best efforts” is maintained, then a definition of what “best efforts” constitutes should be included.

The Working Group believes that if the recycling targets are delayed until 2031 (during the initial adoption of the program), then collectors will leave recyclable material curbside since there will be little incentive to sort out small quantities of contaminated material at the curb. Residents will be frustrated by the perceived lack of service and much of that recyclable material will be set out / brought to the municipal landfills.

The Working Group does not agree that the first increase to recovery targets should be in 10-years from now, during 2035. Targets should be continually increasing during the program implementation to encourage Producers to increasingly produce sustainable packaging in support of a true circular economy for Ontarians.

This regulation has been in the works for many years, with the completion of the three-year transition period arriving in 6-months. We question the late request for additional time by the Producers after multiple-years of preparation.

ITEM 2. Remove Planned Expansion for Multi Residential Buildings, Schools, and Specified Long-Term Care Homes and Retirement Homes

One of the underlying principals of the Blue Box Regulation that we really like is the standardization of blue bin collection across communities. This proposed amendment seems to be contrary to the provinces desire to have a standardized level of service for recycling by allowing for the availability of curbside collection by the Producers to be determined by the construction date for impacted facility types.

Given the rural nature of our area, this Working Group is specifically concerned with removing the planned expansion for schools, specified long-term care homes, and retirement homes. However, we recognise that in urban areas, where the province is pushing for densification, that removing this planned expansion will offer challenging conversations / site planning constraints with respect to the provision of services and placement of on-site recycling bins.

Focusing on Residential Materials

ITEM 3. Remove requirement to collect beverage containers “away from home”

The Working Group strongly disagrees with adjusting how consumers for beverage containers are defined without a corresponding increase from the current 75% recovery target.

If the proposed approach is carried through, we would like to see the recovery target for non-alcoholic beverage containers increased, at a minimum, to 80% for the initial recovery target and 85% for the increased recovery target.

Item 4. Remove Expansion of Public Space Collection

Removing the expansion of public space collection is a disappointing proposal and we hope this expansion will be unchanged from the current wording or that it be reconsidered with modifications.

Many of the materials within public space receptacles are recyclable. We believe that the removal of municipal convenience depots has disadvantaged the municipal operation of public space receptacles. Perhaps an opt-in model could be considered where municipalities collect recyclable material from public space receptacles and transport it to a common collection bin, and then the Producers take responsibility for hauling and processing the collected materials.

Making the Right Investments

Item 5. Reduce and Delay Flexible Plastic Recovery Target

As municipalities, we understand technological limitations in recycling and infrastructure challenges. However, we do not support this reduction to a 5% recovery target for flexible plastic to reflect the estimated current level of diversion, along with delayed enforcement from 2026 to 2031. We would like to see an increased target that would provide an incentive for Producers to develop a material that is recyclable and supports a circular economy. Our municipal landfills do not want this flexible plastic either!

Item 6. Allow energy recovery to count toward diversion targets

We seek clarification to whether non-recyclable means that there is no market for the material (daily markets) or if it means that the material is simply not recyclable in nature. If the material truly cannot be recycled, the Producers should have some incentive to seek alternatives that are not incineration.

We disagree with the proposed limit of 15% and believe it should be lower (or non existent) to encourage research and development into cost-effective, sustainable packaging.

Technical Changes

Item 7. Consider the best ways to ensure collected materials are sent for processing

We agree that “best efforts” requirements are not sufficient to drive diversion under any timelines. We support the proposed change to have collected materials sent to a registered processor and not directly to a landfill.

Item 8. Clarify definition of a facility

We support aligning the definition of a multi-residential building to be consistent with the definition provided in O. Reg. 103/94 (INDUSTRIAL, COMMERCIAL AND INSTITUTIONAL SOURCE SEPARATION PROGRAMS).

Item 9. Clarify collection requirements for schools

We wholeheartedly support this proposed amendment!

Item 10. Maintain depot access for residents in unorganized territories

We agree that blue box access should be maintained for residents in unorganized territories.

Item 11. Update Timelines for Providing Blue Box Services

We agree with the clarification being proposed through this amendment.

Item 12. Provide More Flexibility on Printed Promotion and Education Materials

We agree with this proposed amendment. It does not make sense to produce additional unused blue box materials in this digital age.

Item 13. Provide Flexibility on French Language Requirements

We disagree that French language materials should only be required in areas designated as *French Language Services Act* or when requested by a municipality or resident.

Borders do not define people and this, again, provides a varying level of service across the province.