



The Municipality of
SOUTH DUNDAS



**NORTH
STORMONT**
A good place to grow



July 21, 2025

**Re: Proposed Amendments to Resource Recovery and Circular Economy Act, 2016
ERO #025-0536**

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 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:

- 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 provides the attached comments for consideration during the comment period of June 4, 2025 through July 21, 2025. 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 Management 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 Resource Recovery and Circular Economy Act

Stormont, Dundas, and Glengarry Regional Waste Working Group

Comments on Proposed Amendments to Resource Recovery and Circular Economy Act

July 21, 2025

ITEM 1. Gathering Information to Assess System Effectiveness and Plan Future Changes

We support this amendment as proposed through Schedule 20 of Bill 46, Protect Ontario by Cutting Red Tape Act, 2025.

ITEM 2. Increasing Transparency on Costs and System Data

We support this amendment as proposed through Schedule 20 of Bill 46, Protect Ontario by Cutting Red Tape Act, 2025.

ITEM 3. Maintaining Collection for Small Businesses

We support this amendment. The SDG Regional Waste Management Working Group, including our municipal neighbours at the City of Cornwall, have collectively been lobbying for a small generator exemption to reduce the duplication of services being provided, the number of waste collection vehicles on the roads, and the increased cost to municipalities who choose to continue providing service to the small business sector.

The Working Group is comprised of rural, local municipalities who collected from a limited number of small businesses to encourage recycling and support our local business owners. The recyclable materials generated by the majority of these small businesses is very equivalent to a residential household. The municipalities in our Working Group all ceased service to these small businesses as of January 1, 2025 given the cost implications.

While the Working Group would like to see these small business generators included in the Producer Responsibility, we acknowledge that this is a positive amendment. Under this model, the cost offered to municipalities must be transparently fair and not subsidizing the Producers' responsibilities.

We encourage there to be further thought to including small business generators in rural areas as part of the Producer Responsibility to support local economies, preserve landfill capacity across Ontario, and encourage the circular economy.