



July 21, 2025

Ministry of the Environment, Conservation and Parks  
5<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON  
M7A 2J3

## **RE: Producer Responsible Recycling**

The Peterborough and the Kawartha Chamber of Commerce welcomes the opportunity to provide input on the continued rollout of the Producer Responsible Recycling program and its impact on small businesses.

One area of concern is the discontinuation of blue box collection from small businesses, many of whom are located along existing residential routes. We strongly encourage the Province to revise the Resource Recovery and Circular Economy Act to formally include these small commercial establishments as eligible sources within the producer-led collection system.

The current exclusion of small businesses from the blue box regulation creates inefficiencies and missed opportunities:

- Many small businesses generate recyclables similar in type and volume to residential sources
- These businesses are often located along existing residential routes and could be easily and efficiently serviced by the same collection vehicles
- Maintaining separate private and public systems for similar materials is duplicative and increases overall system costs

This allows for more efficient collection as one truck will need to do this route, rather than multiple collection vehicles. There are serious concerns that small businesses in rural communities will not be able to find a private company to collect their recycling waste. They do not produce a lot of recyclable waste and private contractors may decline to service them in favour of more profitable locations. Additionally, it can be difficult to get a private collection company to service a business that may be located in rural communities that may be an hour or more from an urban centre.

We have significant concerns about the ambiguity of the impact of this program for recycling centres. Some municipalities are considering no longer accepting any commercial waste as the sorting and processing facilities are subsidized by the municipalities. If this happens, costs of handling recycling waste will increase significantly. There are very few private recycling depots, most of which are located in the GTA and only accept certain types of recycling like paper, metal, or specific types of plastics. This will incur prohibitively expensive increases to costs for collection, sorting, processing, and transportation of recyclable waste.

Small businesses do not have a lot of control over the packaging of the materials they purchase. Making it more difficult for them to recycle these materials is unlikely to lead to a waste reduction.



The changes being brought in through the Producer Responsible Recycling program are likely to cause confusion and reduce participation in recycling programs for businesses while increasing costs and administrative burdens.

The Peterborough and the Kawartha Chamber of Commerce strongly recommends the Ministry consider:

- Amending the regulation to allow small businesses, many of whom are along residential routes, to be included as eligible sources
- Ensure municipally-funded recycling facilities will continue to receive recyclables from businesses

Thank you for this opportunity to provide input on the Producer Responsible Recycling program. Please feel free to reach out for additional feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel Wiebe".

Joel Wiebe  
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