



The Honourable Todd J. McCarthy

Ministry of Environment, Conservation and Parks
5th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Re: Amendments to the Blue Box Regulation. ERO number 025-0009

GFL Environmental, headquartered in Ontario, is the fourth largest diversified environmental services company in North America. GFL plays a critical role in the implementation of Extended Producer Responsibility (EPR) by collecting residential recycling in many of the province's largest municipalities and processing (sorting) a significant portion of Ontario's recyclable materials.

To prepare for full EPR implementation by January 1, 2026, GFL has made **significant** capital investments in fleet, facilities, and technology—including upgrades to our best-in-class preconditioning facilities, recognized as among the most advanced in North America.

While GFL continues to be positioned to meet the recovery targets set out in the original EPR regulation we recommend the following:

RECOMMENDATION 1: We strongly urge the Ministry to uphold recovery rates and ensure that enforceable targets remain in place for 2026. While we understand the need to consider modest short-term adjustments, continued reliance on a "best efforts" approach undermines accountability, weakens investment confidence, and disrupts competitive balance. It will also likely result in increased landfilling of recyclable material and diminished environmental outcomes.

RECOMMENDATION 2: We support a phased approach to implementing recovery targets for flexible plastics, recognizing the technical and operational challenges associated with this material stream. Investment is already underway in Ontario to develop and deploy innovative technologies capable of recycling plastic film and multi-layer flexible packaging, and a measured approach will support long-term system success.

RECOMMENDATION 3: GFL supports a legislative shift to a single Producer Responsibility Organization (PRO) model. A One-PRO system would enhance data and cost transparency, reduce administrative inefficiencies, and ensure full compliance by all producers. It would also mitigate the risk of redundant costs and streamline governance and oversight across the system.

We appreciate the opportunity to provide feedback to the Ministry and are available for continued collaboration.

Sincerely,

A handwritten signature in blue ink that reads 'Nicole Willett'.

Nicole Willett
VP Operations, EPR