



July 4, 2025

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**Re: Town of Grimsby Comments on Proposed Amendments to the Blue Box Regulation
(ERO # 025-0009)**

The Town of Grimsby appreciates the opportunity to provide comments on the proposed amendments to the Blue Box Regulation. As a proud Local Area Municipality within the Regional Municipality of Niagara, Grimsby fully supports the Region of Niagara's submission and stands united with all Niagara municipalities in advocating for a stable, effective, and equitable recycling system that supports Ontario's environmental objectives while reflecting local realities.

The Town has worked closely with the Region, other Local Area Municipalities (LAMs), service providers, and the business community to prepare for the transition to full producer responsibility by January 1, 2026. Like other municipalities, Grimsby has planned its waste management strategy around the existing Blue Box Regulation and is concerned that the proposed amendments will introduce significant operational, financial, and service delivery challenges for the municipality and their residents.

Grimsby echoes the Region's concerns and provides the following comments in support of their submission:

1. Delay of Recovery Targets to 2031:

Grimsby strongly opposes the proposed five-year delay of recovery targets. The delay risks reducing system investments and improving recycling outcomes. Lower capture rates may result in higher contamination, more recyclable materials entering the waste stream, and increased costs to local taxpayers.

2. "Best Efforts" Language:

The introduction of "best efforts" reduces accountability and weakens the integrity of the Blue Box system. This vagueness may lead to underperformance and place additional pressure on municipal waste services.

3. Lack of Management Requirements for Compostable Packaging:

While reporting on compostable packaging is a step forward, it is not enough. A phased

management plan is essential to reduce contamination in recycling and organics streams, avoid operational issues, and control rising costs.

4. Cancellation of Expansion to Multi-Residential, Schools, and LTC Homes:

Grimsby strongly opposes cancelling the planned service expansion. Many residents in multi-residential buildings, schools, and long-term care homes will be unfairly excluded from producer-funded services, undermining equity and service consistency.

5. Elimination of Away-from-Home Beverage Container Collection:

Public spaces such as arenas and community centres generate significant volumes of beverage containers. Eliminating producer responsibility for these wastes will burden municipalities and hinder efforts to improve diversion in public settings.

6. Removal of Public Space Collection Expansion:

Grimsby, like many LAMs, had plans to enhance public space recycling based on the Regulation. Without producer funding, these enhancements are at risk, which may increase litter and reduce access to recycling in community spaces. The Town is also concerned that without support the current level of service for PSR's with in the Town will

7. Reduction and Delay of Flexible Plastic Targets:

The reduction and delay of targets for flexible plastics is a step backward. These materials are growing in use and should be addressed more aggressively to promote innovation, investment, and effective diversion.

8. Energy Recovery as Diversion:

Grimsby supports tracking energy recovery only for non-recyclable materials. Recycling should remain the priority in the waste hierarchy, with energy recovery seen as a last resort.

9. Enforceable Recovery Targets and Auditing:

Grimsby supports enforceable targets and province-wide auditing to ensure producer accountability and system performance.

10. Clarification of Facility Definitions:

Grimsby supports clarifying definitions, particularly for “multi-residential” properties, to ensure proper service coverage.

11. Collection Requirements for Schools:

All schools should receive consistent and comprehensive Blue Box services. Grimsby supports this clarification.

12. Depot Access for Unorganized Territories:

Grimsby supports continued access to Blue Box depots for residents in unorganized territories to ensure consistent service.

13. Timelines for Providing Blue Box Service:

The Town supports this amendment as a practical measure to ensure residents in new developments are not left without service.

14. Promotion & Education Material Flexibility:

Grimsby supports this flexibility but recommends delaying the change until the transition is complete in 2026 to maintain consistent communication with residents.

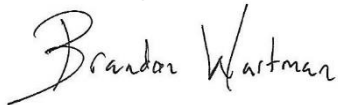
15. Language Requirements:

Grimsby supports flexible language requirements to ensure all residents receive recycling information in commonly spoken languages, enhancing accessibility and participation.

Conclusion:

The Town of Grimsby urges the Ministry to reconsider the proposed amendments and maintain the integrity and effectiveness of the Blue Box system. We stand in full support of the Region of Niagara's recommendations and remain committed to working collaboratively with the province, producers, and our municipal partners to build a successful and equitable EPR framework for all Ontarians.

Sincerely,

A handwritten signature in black ink that reads "Brandon Wartman". The signature is written in a cursive, flowing style.

Brandon Wartman
Director of Public Works