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Krista Friesen
Resource Recovery Policy Branch
40 St. Clair Avenue West
12th floor
Toronto, ON
M4V 1M2

Via email: krista.friesen@ontario.ca

To Whom it May Concern:

Re: ERO 026-0218 – Proposed Amendments to Tires and Other Producer Responsibility Regulations

We are excited to see the proposed amendments as per ERO 026-0218 which will make some helpful changes to the *Resource Recovery and Circular Economy Act* to support stronger waste diversion. However, as a County that is committed to waste reduction and diversion as a means of extending the life of our local landfill, we do believe there are some potential enhancements to the proposed amendment that would further strengthen the impact of this legislation.

[Item 1](#)

We believe the proposed changes to collection requirements will prevent the stockpiling of tires at locations. Along with the proposed change outlined in Item 2, it seems that these two updates would allow for tires to be both collected *and processed* more efficiently and we are supportive of these items.

[Item 3](#)

It is our opinion that the proposal to delay RER requirements related to antifreeze and oil containers for another year is not necessary, as producers have had sufficient time to adapt. Furthermore, this delay only allows producers to procrastinate on what is inevitable and thus undermines the intent of this government's approach to producer responsibility.

[Item 4](#)

We are supportive of the proposed clarifications for collection site requirements as this would allow for an improved distribution of sites and would create a more fulsome collection network.

[Item 5](#)

We are supportive of these proposed changes.

Item 6

We are supportive of these proposed changes, as we believe the sharing of sites would be more advantageous for the general public. To ensure the site is properly managed, it is important these shared sites be fairly prescriptive in nature with responsibilities clearly defined.

Thank you for considering our submission. We appreciate the opportunity to provide input through this ERO posting and respectfully ask that our feedback be carefully considered as the Province moves forward on producer responsibility.

Sincerely,

Chelsea Martin, Coordinator of Community Environmental Sustainability
Oxford County

Cc: Pam Antonio, Supervisor of Waste Management Services
Frank Gross, Senior Manager of Transportation and Waste Management Services
Sarah Hamulecki, Manager of Strategic Initiatives and Intergovernmental Relations