



**Matt Keliher**  
**Chief Operating Officer –**  
**Development (I) & General**  
**Manager**

**Chris Murray**  
**City Manager**

Solid Waste Management Services  
City Hall  
100 Queen Street West  
25<sup>th</sup> Floor, East Tower  
Toronto, ON M5H 2N2

**Tel:** 416-392-4715  
**Fax:** 416-392-4754  
Matt.Keliher@toronto.ca

June 3, 2020

**Sent Via Email:** [serge.imbrogno@ontario.ca](mailto:serge.imbrogno@ontario.ca)

Deputy Minister Serge Imbrogno  
Ministry of the Environment, Conservation and Parks  
College Park, 5th Floor  
777 Bay Street  
Toronto, ON M7A 2J3

Dear Mr. Imbrogno,

**Re: Transition of the Blue Box Program to Extended Producer Responsibility**

---

This letter is to declare the City of Toronto's (the "City") intent to transition its Blue Box Recycling Program in 2023 (Year One), subject to City Council approval. Due to the suspension of City Council meetings resulting from the COVID-19 pandemic, official City Council direction related to Toronto's transition date will be sought in the Fall of 2020.

A transition in Year One is in the best interest for Toronto residents, the Province, and producers. The City's Blue Bin Recycling Program best reflects the full range of responsibilities that producers must take into consideration in preparing for the Province-wide common collection system that will be in place for 2026. Transitioning Toronto first will provide producers with the opportunity to:

- Minimize new capital investment (e.g. containers, transfer stations) to maintain existing Blue Box services through the transition period.
- Build on a solid foundation for development of a broader Greater Toronto Area regional catchment area and opportunities to optimize efficiencies and economies of scale through shared facilities and services over the three-year transition period.
- Work with a successful program that captures a full range of producer packaging, printed papers and paper products being collected for recycling in the Province.

- Pilot test alternative Blue Box collection and management systems in a dense urban environment.
- Gain three years of direct operational experience with collection from all types of housing structures and in a dense urban form, which will allow producers time to prepare the resources required for Province-wide program management in 2026 (the transition will be well-supported by expert City staff).
- Leverage and build on the extensive knowledge base and promotion and education tools already in place to help producers reach the full spectrum of languages and cultures in the City.

Providing producers with three full years' experience with Toronto's system ensures lessons are learned early and time is provided to work through any issues that may arise. It will assist the Province in achieving its transition goals for the system to be completed by the end of 2025. In addition, a transition in 2023 precisely aligns with the expiration of all Toronto's Blue Box service contracts, which allows for a seamless transition for producers. If Toronto transitions in 2024 or 2025, contracts will need to be extended or retendered, resulting in unnecessary costs to Blue Box Stewards funding the existing shared responsibility program as well as Toronto ratepayers.

Toronto has assembled a highly experienced and dedicated Extended Producer Responsibility Transition Team that is leading the planning and coordination of a business transformation plan to ensure a successful and seamless transition for producers. This team will support all parties, especially producers, through the transition period as the City wants the transition to succeed and will undertake all that is necessary to ensure that this is achieved.

The Ministry of the Environment, Conservation and Parks should be applauded for advancing the development of a regulation, made under the *Resource Recovery and Circular Economy Act, 2016*, to guide the transition of the Blue Box Program to Extended Producer Responsibility. We recognize the Province has numerous critical priorities as it deals with the Covid-19 global pandemic and appreciate the continued dedication of provincial staff to maintain the momentum to draft a Packaging, Printed Papers and Paper Products regulation. We also look forward to supporting the Province in achieving again a world-class leading example of Extended Producer Responsibility legislation that can be modelled by others for years to come.

Toronto waste management staff are actively participating in the Province's Municipal Working Group and are working with other stakeholders to continue to advocate for optimal financial, environmental and social outcomes throughout the development of the regulation. The City has been a long-time advocate for the transition of Ontario's waste diversion programs to Extended Producer Responsibility to shift the financial and operational responsibility from municipalities to producers.

We look forward to continuing to participate in the Province's thoughtful engagement process and providing input for consideration in the development of the draft regulation.

Yours truly,



Matt Keliher  
Chief Operating Officer – Development (I)  
& General Manager  
Solid Waste Management Services

MK/rd

Copy to: The Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks, Email: [minister.mecp@ontario.ca](mailto:minister.mecp@ontario.ca)

Mayor John Tory, City of Toronto, Email: [Mayor\\_Tory@toronto.ca](mailto:Mayor_Tory@toronto.ca)

Charles O'Hara, Director, Resource Recovery Policy Branch, Ministry of the Environment, Conservation and Parks, Email: [charles.o'hara@ontario.ca](mailto:charles.o'hara@ontario.ca)

Isaac Apter, Director of Policy, Ministry of the Environment, Conservation and Parks, Email: [isaac.apter@ontario.ca](mailto:isaac.apter@ontario.ca)

Jonathan Ricci, Senior Policy Advisor & Manager of Stakeholder Relations, Ministry of the Environment, Conservation and Parks, Email: [jonathan.ricci@ontario.ca](mailto:jonathan.ricci@ontario.ca)

Carlyle Khan, Acting Deputy General Manager, Solid Waste Management Services, City of Toronto, Email: [Carlyle.Khan@toronto.ca](mailto:Carlyle.Khan@toronto.ca)

Annette Synowiec, Director, Policy, Planning & Outreach, Solid Waste Management Services, City of Toronto, Email: [Annette.Synowiec@toronto.ca](mailto:Annette.Synowiec@toronto.ca)

Charlotte Ueta, Project Director, Business Transformation – Extended Producer Responsibility, Policy, Planning & Outreach, Solid Waste Management Services, City of Toronto, Email: [Charlotte.Ueta@toronto.ca](mailto:Charlotte.Ueta@toronto.ca)

Luke Robertson, Chief of Staff, Office of the Mayor, Email: [Luke.Robertson@toronto.ca](mailto:Luke.Robertson@toronto.ca)

Paul Parsons, Senior Corporate Management & Policy Consultant, Intergovernmental & Agency Relations, City Manager's Office, City of Toronto Email: [Paul.Parsons@toronto.ca](mailto:Paul.Parsons@toronto.ca)