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November 4, 2022

SUBMITTED BY EMAIL: consultations@rpra.ca

Frank Denton, Chief Executive Officer
Resource Productivity and Recovery Authority
4711 Yonge Street, Suite 408
Toronto, ON M2N 6K8

Dear Mr. Denton:

Re: Continuous Improvement Fund (CIF) Windup Plan Amendment Proposal

The City of Toronto (“the City”) is pleased to provide comments on the Continuous Improvement Fund (CIF) Windup Plan Amendment Proposal (“the Proposal”) that was posted on the Resource Productivity and Recovery Authority’s (RPRA) website on October 4, 2022.

Working with the CIF has benefited the City in the past in Blue Box Program planning, as well as on the work over the last several years related to moving the management of blue box materials to an extended producer responsibility (EPR) model. Maintaining an entity that has the capacity to provide ongoing operational and policy support is especially important as municipalities navigate the evolving EPR landscape in Ontario.

1. Continuation of municipal collaboration supported by an entity is essential for a seamless transition to EPR.

The City feels there is a benefit to municipalities across the province to work collaboratively through an entity, as they transition their blue box programs to producers. This approach has proven successful in fostering discussions, sharing ideas and learnings from our own experiences. The continuation of this cooperative model will allow municipalities to address and plan for potential upcoming challenges linked to the transition to EPR, such as ensuring producers meet their obligations for public space recycling, the addition of new materials to the Blue Box and post-transition collection changes.

2. Work and activities being undertaken by the Waste and Recycling Advisory Committee must benefit the funding municipality.

The Proposal recommends the creation of the Waste and Recycling Advisory Committee that will reside within the Association of Municipalities of Ontario (AMO) subsidiary known as the Local Authority Services (LAS) that will be funded by surplus monies after CIF winds up. As the City is not a member of AMO, the City must have the option to make an annual determination regarding the City's disbursements from the CIF surplus funds, starting at the end of 2023.

The City notes that some of the proposed work for the new Waste and Recycling Advisory Committee outlined in the CIF Windup Plan may not be of direct benefit to the City. An example of this would be the advocacy, operational and policy work to support municipalities who are currently collecting recyclables using depots rather than through curbside collection.

By participating as a member of the Waste and Recycling Advisory Committee, the City will benefit from being able to access additional policy expertise and perspectives. It will also be able to help inform, at an early stage, the preparation of policy positions that the City can then consider and/or endorse. This benefits the City as it will be in a position to introduce policy perspectives that may not have been considered that enhance the interests of the City as well as other municipalities. Finally, the City will benefit from a strong coordinated municipal advocacy mechanism that will reflect municipal EPR and recycling interests.

A request has been made for a documented agreement between the City and AMO that will allow a City staff member to attend AMO and LAS Board meetings as an observer where operational work plans and budgets of the new Waste and Recycling Advisory Committee within LAS are considered. AMO staff have communicated to the City that the AMO senior leadership team are in agreement with this request.

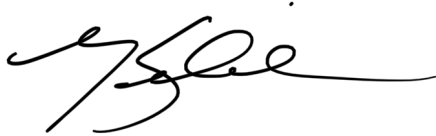
3. The City's participation and commitment of its portion of the CIF surplus funds is subject to approval from Toronto City Council.

The City's participation in the work of the Waste and Recycling Advisory Committee is conditional on obtaining approval from Toronto City Council. This approval is required for the transfer of the City's share of the CIF surplus funds to the Waste and Recycling Advisory Committee, subject to an agreement with AMO. A staff report will be developed for consideration by Toronto City Council early in 2023.

Should you have any questions regarding our submission, please contact Annette Synowiec, Director of Policy, Planning & Outreach, Solid Waste Management Services, by email at Annette.Synowiec@toronto.ca or by telephone at 416-392-9095.

Thank you for your consideration.

Yours truly,



Matt Keliher
General Manager
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