



January 27, 2023

Toronto Infrastructure and Environment Committee

By email: iec@toronto.ca

Re: [IE 1.8 - Update on the Transition of Toronto's Blue Bin Recycling Program to Extended Producer Responsibility](#)

To Councillors and Committee members,

The Toronto Environmental Alliance is an environmental non-profit organization that has been advocating for zero waste policies and programs for over thirty years.

As Ontario's new Blue Box program transitions to a new regulation that shifts the responsibility for recycling to the manufacturers and producers of packaging, we call on the City to safeguard Toronto's waste diversion results. Toronto's waste diversion programs are important environmental services and the success of those programs is critical to meeting Toronto's climate goals.

The staff report before you outlines the detailed plan to transition to this new plan.

TEA strongly supports the principle of holding producers responsible for the design and management of the packaging and products they sell, however we have serious concerns that this **particular Provincial regulation has serious flaws**. In particular, low recycling targets, opaque reporting requirements, and gaps in who is served will continue, or increase, the waste and plastic problems we currently face.

As such, we feel it is critical that the City stay focused on waste diversion targets, reducing overall waste, and improving education.

- 1. We are pleased to see that the City has negotiated an agreement to retain as much control as possible and a role in delivery of recycling services.** City staff and collection workers have decades of expertise in delivering a high quality and complex waste diversion program. Maintaining this delivery role will put Toronto in the best position to provide good services and, critically, to monitor the results.
- 2. We are happy to see the commitment to continuing recycling and waste services to City customers currently left out of the new Blue Box regulation** - specifically civic centres, shelters, libraries, community centres, small businesses and charities. Providing waste services to this group of customers not only

ensures higher waste diversion rates, but supports important community services and small businesses that would otherwise not be able to afford recycling and organics diversion.

3. We call on the City to step up communications, outreach and feedback to residents to improve diversion and meet the strict contamination requirements of the new program.

The new contract with producers commits our city to reduce contamination rates (or sorting errors) in the Blue Bin to 4%, while in recent years contamination rates have been reported of over 20%. High contamination lowers the quality of all recyclables in the Bin, and, with a lower threshold to meet, this means more recyclables may be rejected and sent to landfill.

At the same time, waste audits show that the average garbage bin includes 20 to 25% of recyclables that *should* be in the Blue Bin. These sorting errors add up to increased waste to landfill, and missed diversion opportunities.

To reduce sorting errors and improve diversion, a comprehensive plan to improve education and sorting is needed - including targeted communication, close monitoring and feedback to residents about errors - more than the contracted requirement of one mail out per year.

4. Finally, the City should continue to advocate to the Province to amend the regulation to fix the significant flaws to close the loopholes, to raise the recycling targets and to provide assurance that there will be strict enforcement and reporting.

We urge the City to proactively take steps to protect Toronto's recycling success, push to improve diversion in the city, and protect the environment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Emily Alfred', written in a cursive style.

Emily Alfred

Waste Campaigner, Toronto Environmental Alliance