

September 19, 2023

Toronto Infrastructure and Environment Committee

By email: [iec@toronto.ca](mailto:iec@toronto.ca)

Re: IE 6.3 [Transition of Toronto's Blue Bin Recycling Program to Extended Producer Responsibility](#)

To Councillors and Committee members,

The Toronto Environmental Alliance (TEA) 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 do everything within their power 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.

Under Ontario's new waste regulations, and the new Blue Box regulation in effect since July this year, the City no longer pays the cost of collection and managing recycling. Instead, the companies that design and market this packaging bear the responsibility for managing the growing amounts of complex packaging in our blue boxes. TEA has strongly supported the principle of holding producers responsible for the design and management of the packaging and products they sell for decades. While the City has retained local delivery of recycling collection on behalf of producers from 2023 to 2026 during the transition period, the recommendations before you today are about collection in the years 2026 and beyond.

TEA offers the following comments on the report and recommendations in IE6.3.

**1. We are disappointed to see that the option for the City to collect recycling post 2026 is not feasible based on the conditions set by the producers under Ontario's new Blue Box program.**

We have previously expressed support for the City retaining local delivery of recycling collection from 2023 to 2026 during the transition phase to this new system. This was done by negotiating to work on behalf of the producers, who are ultimately responsible for ensuring their products are recycled. Retaining recycling collection was a strong move to protect Toronto's waste diversion and climate change goals, monitor the roll out of a new system, and ensure a seamless experience for residents.

**2. We strongly support the staff recommendation to review collection operations in District 2 to look at the best delivery options post-2026, including bringing those services in house.**

As we've outlined in past reports, public control over collection allows for closer monitoring of waste streams and greater public accountability. Considering the changing landscape of waste regulations in Ontario in the coming years, and the need to get creative to meet the City's waste diversion goals, local control also gives more flexibility to adjust and add new services as needed. Evaluating the options to bring collection of waste, organics, yard waste and other materials in District 2 and collection from multi-residential customers in house can give the city more control over key waste streams.

**3. We urge Council and City staff to continue to advocate to the Province to address the significant flaws in the Blue Box and other producer responsibility regulations, and to provide assurance that there will be strict enforcement and transparent reporting by producers.**

While TEA has generally supported making producers more responsible for the products they sell, TEA has repeatedly raised concerns that this **particular Provincial regulation has serious flaws that could send Ontario's diversion rate backwards**. This regulation has low recycling targets, opaque reporting requirements, and has a serious lack of transparency and accountability, even as producers fail to meet their obligations.

**The result will be lower diversion rates, more garbage, more greenhouse gas emissions, and more costs for cities.** For example, batteries transitioned to this new producer managed system a few years ago, and under their control, [battery recycling rates have plummeted in Ontario](#), from a **high of 47% in 2019 to just 12% last year**.

The Provincial Blue Box regulation, along with a number of other waste regulations are facing pushback from producers and private sector players to weaken them further. They are seeking to lower management targets, reduce reporting requirements, and ultimately weaken the already weak regulation. This directly results in higher costs for municipalities, who will be the ones left dealing with lower recycling rates, more garbage, more litter and no long term solution that reduces waste at the start. Continued advocacy from municipalities is necessary to counter this pushback.

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,



Emily Alfred

Waste Campaigner, Toronto Environmental Alliance