

November 10, 2025

To: Mayor Chow and Toronto City Councillors

Re: [IE 25.2 - Transition of the Blue Box Program to Extended Producer Responsibility: Post-Transition Plan](#)

The Toronto Environmental Alliance (TEA) is an environmental non-profit organization that has been advocating for zero waste policies and programs for many years, including recycling and the Blue Box.

We have serious concerns about the Blue Box transition happening across Ontario and the major negative impacts it will have on the environment and Toronto residents. In the face of these major flaws, we urge Council to stay committed to Toronto's waste diversion goals: The aspirational goal of zero waste, a commitment to 70% diversion target, and to building a resilient circular economy that reduces waste, addresses climate change, and supports local green jobs.

Background

Ontario's Blue Box transition enters the next phase in January 2026. The new system is based on Extended Producer Responsibility or EPR; it transfers the responsibility for residential recycling away from the city and puts the obligation on the producers that make those products. That system is meant to incentivize packaging producers to reduce waste by ensuring that they pay to deal with it.

The Blue Box regulation was meant to improve recycling by accepting more materials and creating a consistent, streamlined system across the province so that all residents and communities, no matter where they live or what type of building they live in, can recycle their waste. However, as has been widely reported by the media, by City of Toronto staff and by environmental groups, **Ontario's new Blue Box regulation will not improve recycling, it will make it worse.**

The Province has been relentlessly lobbied by producers to focus not on the environmental outcomes, but on lowering costs for producers. Producers pushed the Province to weaken and delay recycling targets, to allow incineration to count as recycling, to weaken penalties and, significantly, to declare many buildings and locations as 'ineligible' for producer-funded Blue Box recycling.

For Toronto, these 'ineligible' building types will have a significant impact on our city and residents.

No public space recycling

Despite commitments to include public spaces, the Province weakened the regulation so that producers will NOT be responsible for public space recycling bins in parks and on Toronto streets. Producers have contributed to municipal recycling costs for many years, so this is actually a step backwards. This is particularly an issue in a major city like Toronto with millions of commuters, tourists and visitors enjoying our parks, public spaces - including the FIFA World Cup 26 next year. This cost will now be fully paid by the city.

No Blue Box recycling for many multi-residential buildings

Instead of ensuring that all residents in Ontario get producer-funded free Blue Box recycling as planned, hundreds of thousands of residents will be considered 'ineligible' and have to pay for their recycling services.

Residents that aren't already getting City waste collection - those in the portion of multi-unit buildings that currently have private waste collection, or in buildings under construction - will be 'ineligible'. They won't get the producer-funded Blue Box and will have to wait until 2031. This will affect tens of thousands of households in existing condos and apartments and any new multi-unit building. City staff estimate this could be up to 85,000 *new* households (including non-profit and Toronto community housing) that will have to pay a private company to provide recycling.

Other ineligible sources

We are also dismayed that many daycares, some community buildings and charities and many small businesses are considered 'ineligible' and will be denied producer-funded Blue Box recycling. We've heard of public schools in Ottawa simply cancelling their recycling services since they couldn't afford to continue. What does that mean for education about recycling for children?

In addition to many locations being considered 'ineligible' for producer-funded Blue Box services, there will be many other issues that will emerge slowly and behind-the-scenes. The new Blue Box regulation means less public reporting and transparency about what happens with recyclables, allowing incineration to count as a type of recycling, the lack of enforceable targets for the first few years, and minimal penalties means that producers won't really need to try that hard.

Next Steps for the City of Toronto

This is a crisis, and a bad situation that is not of the City's making. Staff have worked hard to solve this, and many environmental and other groups have urged the Province to fix it.

We urge Toronto Council and staff to stay focused on the broader goal of a clean, healthy environment, and a circular economy with zero waste. This requires a public, visible commitment to waste diversion and recycling that continues even after the City is not legally obligated to provide recycling. This can be achieved with actions such as clear communications, effective collection in public spaces, at home, in the community and at work.

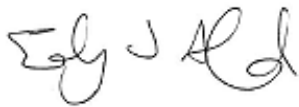
The City can also demonstrate a commitment through other municipal policies and programs to address waste, such as addressing single-use and takeaway items, like take out food packaging, that can also help to address a large portion of the litter and public waste at its source.

Please continue to push the Province to fix this destructive regulation, to include all residents as 'eligible' sources, to provide recycling at home, in the community and at work, and to ensure recycling actually means recycling, with real targets, and no incineration.

We urge Council to ensure staff have the resources they need to closely monitor the transition to the new Blue Box system, to document and measure the impact to identify and demonstrate gaps and to support recommendations for a fix.

We look forward to further updates from the Province and the City of Toronto as this transition progresses, and are committed to ongoing advocacy supporting effective waste diversion.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Alfred". The signature is fluid and cursive, with the first name "Emily" and the last name "Alfred" clearly distinguishable.

Emily Alfred
Waste Campaigner, Toronto Environmental Alliance