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SUBMITTED BY EMAIL: consultations@rpra.ca

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

Dear Mr. Gitterman:

Re: Development of Blue Box Performance Reporting and Audit Procedure

The City of Toronto ("the City") is pleased to provide comments regarding the work being undertaken by the Resource Productivity and Recovery Authority (RPRa) to develop a Blue Box performance and audit procedure. As a municipal producer of Blue Box materials, we appreciate the opportunity to provide comments for your consideration.

The City appreciates the complexity of the Blue Box program under the Resource Recovery and Circular Economy Act, 2016 (RRCEA), including the fact that the program manages a multitude of items with different compositions from a variety of sources. However, as a registered municipal producer of Blue Box materials, the City is concerned that RPRa continues to develop processes and procedures that are informed primarily by how private for-profit producers of Blue Box materials operate.

The consultation slides for the development of the reporting and audit procedure note that one of the principles in the development of the procedure is "achievable audit requirements that align with industry operations". The City would like more information on how RPRa will be taking into account the unique responsibilities of municipal producers for the delivery of services to residents. For example, municipal producers need to provide paper versions of such things as tax bills and utility bills to residents who might not have access to or be comfortable with electronic versions. In addition, municipal producers have to engage directly with residents to provide services and information in a manner that reflects accessibility and human rights accommodations through the use of multiple formats, including paper, and in many different languages.

The obligations of the municipal producer to the resident who is the “consumer” of a “product” differs from for-profit producers, whose relationship is by and large a commercial transaction involving their product or packaging being sold to consumers. These producers generally do not engage directly with the consumer based on their individual needs.

While RPRA has held discussions with Producer Responsibility Organizations (PROs) and industry associations (slide 8 of the RPRA consultation slides) to discuss the development of the reporting and audit procedure, these groups do not represent the interests or concerns of municipal producers. While PROs do provide services on behalf of municipal producers, their primary focus is on their industry clients, which provide PROs with the bulk of their billable services to producers.

The City believes there is the need for RPRA to engage government producers, especially now that the Province of Ontario has registered as a producer of Blue Box materials. The meeting would be a forum to discuss the obligations of government producers and to find an approach to meeting those obligations in a way that minimizes administrative burden. The City feels, based on past discussions, that other municipalities would also be interested in participating.

The City is committed to the policy intent of the Blue Box regulation and continues to take steps to reduce its waste footprint. We look forward to a positive response to our request so that we can continue to make constructive contributions to the work of RPRA.

Should you have any questions, please feel free to contact Charlotte Ueta, Acting Director of Policy, Planning & Outreach at Charlotte.Ueta@toronto.ca or by telephone at 416- 392-8506.

Thank you for your consideration.

Yours truly,



Matt Keliher
General Manager
Solid Waste Management Services
City of Toronto

MK/ts

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