

Will Johnston
Deputy City Manager

Solid Waste Management Services
City Hall
100 Queen Street West
25th Floor, East Tower
Toronto, ON M5H 2N2

Tel: 416-392-4715
Fax: 416-392-4754
Matt.Keliher@toronto.ca

Friday October 31, 2025

Sent by email to: alangdon@circularmaterials.ca, ngourley@circularmaterials.ca

Allen Langdon
Chief Executive Office, Circular Materials
700-1 St. Clair Ave. West
Toronto, ON M4V 1K6

Nicole Gourley
Chief Operating Officer
700-1 St. Clair Ave. West
Toronto, ON M4V 1K6

Dear Allen and Nicole:

Re: The Necessity of Supplemental Recycling Collection for Households Impacted by Route Optimization for January 2026 on Account of the Transition of the Blue Box Program to Extended Producer Responsibility

The City of Toronto (the “City”) is exceptionally concerned with Circular Materials’ current position to not offer additional and appropriate recycling collection in January (except for January 5, 2026) for customers impacted by mutually agreed-upon route optimization modifications that will occur in Districts 2 and 3 in January 2026. This letter provides further details on the tremendous impact of this decision and to implore you to reconsider by Friday November 7, 2025, after which time I will need to engage the City Manager, the Mayor’s Office, and our Communications Division on next steps.

Operational Impact of the Blue Box Program Transition to Extended Producer Responsibility

As a direct result of the transition of the Blue Box Program to Extended Producer Responsibility and Circular Materials’ decision to not contract the City to provide curbside recycling collection services in 2026, City staff and fleet resources will become unbalanced in 2026, resulting in an inefficient system. At their April 17 and 18, 2024 meeting, City Council

directed staff to “implement curbside collection routing changes as a result of no longer collecting eligible Blue Box materials to re-optimize collection services and to investigate potential efficiencies and synergies within collections and litter operations”.¹

In response to this impact and City Council direction, City staff examined alternative collection approaches that would improve efficiency while minimizing impacts to residents. A route optimization operational analysis was conducted and a switch in collection week for garbage and recycling for approximately half of Districts 2 and 3 residents was deemed an operationally and financially worthwhile endeavour. This change, brought forth to City Council at their April 23 and 24, 2025 meeting, will realize an approximate savings of \$7 million dollars for District 3 and an estimated \$5 million dollars for District 2 over a 5-year period, benefitting both the City and GFL Environmental Inc as the contracted service provider for District 2.²

Prior to bringing this forward to City Council in April 2025, staff engaged Circular Materials on matching the City’s operational changes and switching recycling collection to alternate weeks. This change would minimize congestion at the curb and maintain the alternating weeks of garbage and blue box collection to which residents are very accustomed. On April 9, 2025, Sherry Arcaro, Vice President, National Operations and Program Implementation for Circular Materials provided written confirmation that Circular Materials’ contractor could accommodate the change in collection week for recycling for approximately 125,000 households in Districts 2 and 3. The City applauds Circular Materials for agreeing to undertake this change, which financially and operationally benefits both service providers.

With the green light given by City Council and Circular Materials, City staff negotiated and amended collection contracts and began planning for the operational change and communication efforts that would be needed for this to take effect in January 2026. Furthermore, more than 500,000 joint schedules are in print production and the distribution of the new schedules to impacted households in District 2 and District 3 will commence imminently. The City is also sending a direct mail communication to impacted residents explaining that the change is happening due to route optimizations on account of the Blue Box regulation that transitions the responsibility of recycling services to producers. The City will have staff on the street during collections in January to answer questions and ensure residents understand the change. The City is not in a position to reverse the route optimization implementation and it will move forward with this change in January 2026.

City of Toronto Implores Circular Materials to Provide Supplemental Recycling Collection in January 2026 to Ensure Customer Service Needs are Met

To ensure no household goes three (3) weeks without garbage collection during the scheduling change, the City will collect garbage two (2) weeks in a row for impacted households and further dual garbage collection and on-street outreach efforts will occur throughout January 2026 to ensure residents understand why the change is happening and comply with material set out instructions. The City has undertaken routing changes in the past, and providing this additional service during transition is an industry best practice to ensure the least disruption in program operation and residence compliance.

¹ City Council Decision Document, Item – 2024.IE12.1: [Agenda Item History - 2024.IE12.1](#)

² City Council Decision Document, Item – 2025.IE20.5: [Agenda Item History - 2025.IE20.5](#)

The City strongly implores Circular Materials to match the City's best practices and offer additional recycling for a minimum of the first collection cycle (two weeks) in 2026. However, if Circular Materials does not provide additional recycling collection for at least the first full collection cycle in January 2026, approximately 57,800 households will be in a situation where the schedule change will leave them without recycling for 20 days. Please see Attachment 1 for further information. Offering additional recycling (only as required) for a minimum of the first collection cycle in the 2026 year will shorten this gap, allow for change management to support the new schedule, and confirm impacted residents will not have to store additional recycling materials for nearly three (3) weeks. With limited on-site storage capacity for many households in Districts 2 and 3, this is essential.

Furthermore, residents that do not receive recycling for 20 days presents a conflict with *O.Reg 391/21: Blue Box, Section 22 Obligations for Curbside Collection*, which states that Blue Box Materials must be collected "from the residence at least every other week".³

As the transition is already a complex time, extra attention to customer service is crucial and, as a collaborating partner, we hope our priorities are aligned in ensuring success and a great customer experience in the new year.

If Circular Materials does not provide additional recycling collection in January 2026, the City's 311 Customer Service call centre and Circular Materials' contracted call centre will be overwhelmed with missed collection calls. This, combined with the expense associated with returning to collect the materials; a revised communications plan; and collection schedule reprint and additional mailing to impacted residents will be a significant expense to both the City and Circular Materials and may be higher than providing the additional collection in January.

The operational and financial impact and reputational risk associated with Circular Materials not matching the City's service level in January 2026 can be avoided by providing this additional collection support to residents for at least one (1) collection cycle. With the extensive communications being undertaken by the City to promote and educate residents on this change, staff are hopeful additional collection will not be required for the majority of impacted residents in Districts 2 and 3.

Requested Action– Response from Circular Materials Required by Friday November 7, 2025

As the City is currently preparing to launch the change management and communications plan to inform residents of the new recycling system, there is an urgent need to confirm what support services Circular Materials will provide during the first collection cycle, at minimum, and in the remaining weeks in January 2026 to support residents that are challenged by the change.

I strongly urge Circular Materials to revisit its position and agree to provide additional recycling collection for impacted households for at least the first collection cycle of 2026. The City needs a definitive response from Circular Materials by Friday November 7, 2025 on whether Circular Materials will provide the extra recycling collection in January 2026 so next steps with the City

³ O.Reg. 391/21: Blue Box: [O. Reg. 391/21 BLUE BOX | ontario.ca](https://www.ontario.ca/laws/reg/21/2100391.pdf)

Manager, Mayor's Office and the City's Communications Division can be undertaken. I look forward to your response.

Yours truly,



Matt Keliher
General Manager
Solid Waste Management Services

MK/mk

Attachment 1 – Districts 2 and 3 Residences: 20 Days without Recycling

Copy to: Will Johnston, Deputy City Manager, Infrastructure & Development Services,
City of Toronto, Email: Will.Johnston@toronto.ca

Charlotte Ueta, Director (Acting), Policy, Planning & Outreach, Solid Waste
Management Service, City of Toronto, Email: Charlotte.Ueta@toronto.ca

Annette Synowiec, Director, Collections & Litter Operations, Solid Waste
Management Services, City of Toronto, Email: Annette.Synowiec@toronto.ca

Attachment 1 – Districts 2 and 3 Residences: 20 Days without Recycling

District 2					
Day of the Week	Number of Affected Customers for Recycle Collection	Last Recycling Set Out	1 st New Recycling Day	Number of Days Without Recycling	Day Additional Recycling Collection is Being Requested
Tuesday	7478	December 23rd, 2025	January 13th, 2026	20	January 6th, 2026
Wednesday	11334	December 24th, 2025	January 14th, 2026	20	January 7th, 2026
Thursday	7292	December 18th, 2025	January 8th, 2026	20	January 2nd, 2026
Friday	4904	December 19th, 2025	January 9th, 2026	20	January 3rd, 2026
Total	31008				

District 3					
Day of the Week	Number of Affected Customers for Recycle Collection	Last Recycling Set Out	1 st New Recycling Day	Number of Days Without Recycling	Day Additional Recycling Collection is Being Requested
Tuesday	6715	December 23rd, 2025	January 13th, 2026	20	January 6th, 2026
Wednesday	5969	December 24th, 2025	January 14th, 2026	20	January 7th, 2026
Thursday	7329	December 18th, 2025	January 8th, 2026	20	January 2nd, 2026
Friday	6778	December 19th, 2025	January 9th, 2026	20	January 3rd, 2026
Total	26791				