

Transition of the Blue Box Program to Extended Producer Responsibility: Q1 2026 Post-Transition Implementation Update

Date: April 22, 2026

To: Infrastructure and Environment Committee

From: General Manager, Solid Waste Management Services

Wards: All

SUMMARY

The purpose of this report is to respond to the direction received from City Council in November 2025 and the request from Infrastructure and Environment Committee in February 2026 with an update on the implementation of the Blue Box Program's transition to Extended Producer Responsibility from January to March 2026. While the initial transition to producers in January 2026 saw significant Blue Box Program service disruption, program operations have since been improving with fewer missed collections and resident calls to 311 Toronto.

The report also provides a strategy to minimize the risks associated with uncollected Blue Bins and recyclables going to landfill or becoming litter, including legal considerations, the use of waste audits for policy, promotion and education development, and continued dialogue with Circular Materials to maintain the best service outcomes for the City and its residents. Additionally, the report explores public space recycling and upcoming advocacy opportunities to support the goal of diverting waste from landfill.

RECOMMENDATIONS

The General Manager of Solid Waste Management Services recommends that:

1. Infrastructure and Environment Committee receive this report for information.

FINANCIAL IMPACT

There are no financial impacts arising from the adoption of this report. The Chief Financial Officer and Treasurer have reviewed this report and agrees with the financial impact information.

DECISION HISTORY

At its meeting on February 25, 2026, the Infrastructure and Environment Committee adopted item IE27.5 entitled "Transition of the Blue Box Program to Extended Producer Responsibility - Preliminary Post-Transition Implementation Update", in which the Committee, among other Decisions, requested the General Manager, Solid Waste Management Services to continue to monitor the waste stream and to report back in Q2 2026 on any increase in the volume of collection in the garbage stream and if there has been an increase of recyclable materials in that stream. Furthermore, the Committee requested the General Manager, Service Excellence, and the General Manager, Solid Waste Management Services, to publish monthly ward dashboards of recycling-related complaints received by the City, including 311 volumes, complaint types, missed-collection maps, and of impacts on City solid waste costs, such as tonnage shifts, contamination trends, for the rest of 2026.

The Infrastructure and Environment Committee Decision document can be viewed at: <https://secure.toronto.ca/council/agenda-item.do?item=2026.IE27.5>

At its meeting on December 4, 2025, the Infrastructure and Environment Committee adopted item IE26.2 entitled "Transition of the Blue Box Program to Extended Producer Responsibility: Preparation for January 2026 Collection". Amongst other decisions, the Committee requested the General Manager, Solid Waste Management Services to report to the first Infrastructure and Environment Committee meeting in 2026 with an overview and analysis of the initial phase of the transition of Blue Bin collection.

The Infrastructure and Environment Committee Decision document can be viewed at: <https://secure.toronto.ca/council/agenda-item.do?item=2025.IE26.2>

At its meeting on November 12 and 13, 2025, City Council adopted item IE25.2 entitled "Transition of the Blue Box Program to Extended Producer Responsibility: Post-Transition Plan". Amongst other decisions, City Council directed the General Manager, Solid Waste Management Services, in consultation with the City Solicitor, to report to Council in the second quarter of 2026 with an update on the implementation of Extended Producer Responsibility, plus a strategy to minimize the risks of: a. uncollected Blue Bins; b. Blue Box material going to landfill at City expense; and, c. Blue Box materials becoming litter.

City Council considered a report and Confidential Attachment from the City Solicitor, to be considered in conjunction with IE25.2, on "Legal Advice Regarding Aspects of the City of Toronto's Blue Box Program Post-Transition Plan." The report can be viewed at: <https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-259428.pdf>.

The City Council Decision document can be viewed at:
<https://secure.toronto.ca/council/agenda-item.do?item=2025.IE25.2>

COMMENTS

Post-Transition Q1 2026 Update

At the February 25, 2026, meeting of the Infrastructure and Environment Committee, Solid Waste Management Services (SWMS) and the Customer Experience Division (CXD) were requested to publish monthly ward dashboards of recycling-related complaints received by the City, including 311 volumes, complaint types, and missed-collection maps. From January 1, 2026, to end of April 2026, CXD collected data through a survey on the nature and location of issues related to residential recycling calls. As of May 2026, CXD no longer collects this information; therefore, cannot create ward-specific dashboards, but can provide data on overall call volumes related to this topic. Circular Materials also indicated at the February 25, 2026, Infrastructure and Environment Committee meeting that monthly ward dashboards including their information would not be feasible. This section of the report provides an update on customer service metrics for Q1 2026, based on data gathered by CXD.

Customer Experience

On January 1, 2026, when the residential Blue Bin Program transitioned to producers, 311 implemented an automatic call transfer to Circular Materials' customer service hotline using its Interactive Voice Response (IVR) System. This approach was implemented to support a smooth transition, manage anticipated call volumes within 311, and provide residents with a clear pathway to Circular Materials during the early transition period.

Paired with a robust campaign leading up to January 2026 to raise public awareness on the change in recycling collection service provider, the IVR was planned as a temporary measure to support the transition during the first three months of 2026 as residents became accustomed to calling the new service provider. Residents speaking to 311 Customer Service Representatives about residential recycling were also live transferred to the Circular Materials' customer service hotline.

Following an initial spike in call volumes in January 2026, primarily driven by missed recycling collections, there was a 67.7% decrease in call volumes in February and a continued decline in March. Please see Table 1 for a summary of 311 call volumes from January to March 2026.

Table 1: 311 Call volumes from January - March 2026

	IVR Call Transfers*	Live Operator Transfers**	Surveys Conducted***	311 Escalations to Circular Materials****
January	9,264*	1,246	787	124
February	3,008*	391	197	34
March	3,156	342	130	25

* The IVR was temporarily disabled from January 26 to February 2, 2026, due to a major snow event.

**311 Customer Service Representatives transfer callers to Circular Materials' collection contractor's main customer service hotline.

***Surveys were implemented from January 2026 to April 2026 to monitor the nature of recycling calls answered by CSRs. See below section on "Residential Recycling Survey & Collection of Issue and Ward Specific Data" and Appendix 1: Customer Service Metrics for Q1 2026 for more information.

****Callers are transferred to an escalation line at Circular Materials for follow-up if callers are not satisfied with the initial response by the collection contractor's hotline and wishes to file a complaint with Circular Materials.

Rationale for Discontinuing the Interactive Voice Response for Blue Bins

At the end of the three-month transition period, the IVR message and automated call transfer to Circular Materials' customer service hotline was discontinued as planned. 311 continues to receive calls regarding recycling matters, and 311 Customer Service Representative (CSRs) manually redirect residents to Circular Materials' hotline.

In addition to the reduction in call volumes, other factors were considered in the decision to discontinue the IVR, including the following:

- Turning off the IVR does not restrict access to information about residential recycling, as 311 will continue to take these calls through its main line. 311's CSRs will continue to provide general education on the change, transfer residents to the new service provider, and track call transfer volumes for monitoring purposes.
- IVR messaging is most effective when applied to urgent, emerging or widespread issues impacting 311 users. During the major winter event in February, CXD had to temporarily disable the recycling IVR to support winter operations. Temporarily disabling the IVR did not result in an increase in CSR-handled calls about residential recycling during that period. Turning off the IVR messaging for recycling will allow for more flexibility to use the system as new priority issues arise.
- The blue bin IVR message was broadcast to all 311 callers, while only being relevant to a small percentage, especially as recycling-related call volumes decrease. This increases the time a customer spends listening to the IVR options before reaching a live agent, which is inconsistent with call-routing best practices that aim to minimize wait time and expedite access to service.

- As a well-recognized City service, 311 will continue to receive calls about residential recycling. When callers are automatically transferred through the IVR, they do not always understand they are being connected to an external provider rather than the City. As a result, IVR messaging has limited effectiveness in changing customer behaviour or guiding customers on who to contact in the future. Live CSR interactions are more effective than automated messaging in educating customers on the change and encouraging them to contact the new service provider directly for future issues.

Residential Recycling Survey & Collection of Issue and Ward Specific Data

During Q1 2026, CXD and SWMS implemented a temporary phone survey allowing 311 CSRs to document the nature and location of issues related to residential recycling callers. The intent was to identify and address transition challenges by providing the City and elected officials with early insight into issues and trends.

The survey identified a range of blue bin concerns, such as missed collections, recycling bin issues, and service provider complaints. The City did not address identified issues, but the resident was transferred to Circular Materials' customer service hotline for further support. The survey results were reviewed by SWMS to understand the types of recycling concerns that were reported by residents and where they occurred.

Survey results have remained consistent, with no new or emerging issues identified. Residential recycling-related calls have decreased to between approximately zero to fifteen calls per week, except for Missed Pick Up related calls, which continue to decline at a rate of between 10 per cent to 65 per cent week over week. Please see Attachment 1 for detailed customer service metrics.

The initial plan was for the survey to continue until the end of Q1 2026 to support reporting during the transition period. However, to gauge the call volume impact on CSRs after the IVR was discontinued in April, CXD extended the survey until the end of April 2026. As of May 1, 2026, all residential recycling-related calls will be managed by 311 in alignment with the standard handling process for general inquiries. Therefore, monitoring will shift to focus on overall call volumes rather than ward-level detail or issue-specific breakdowns.

Blue Box Program Risk Mitigation

In the years preceding the transition, and in the months since January 1, 2026, SWMS' primary focus has been to protect Toronto residents and the City's waste system from potential adverse impacts resulting from the Blue Box Program's changeover to producers. Of primary concern has been impacts resulting from uncollected residential Blue Bins and recyclables becoming litter or entering the waste streams managed by the City (i.e. garbage and organics). This section of the staff report examines these three (3) areas of potential risk to the City.

Uncollected Blue Bins

While the City recognizes the inconvenience and frustration uncollected Blue Bins create for residents, on account of the Blue Box regulation that transitioned recycling management responsibilities to producers, the City cannot collect from residential recycling bins that have been missed or intentionally left uncollected at the curb due to contamination. Both the curbside residential blue bins and Blue Box Materials belong to producers, not the City, so the City cannot manage these materials.

At their meeting on November 12 and 13, 2025, Toronto City Council considered a [report](#) from the City Solicitor on "Legal Advice Regarding Aspects of the City of Toronto's Blue Box Program Post-Transition Plan". The report's confidential attachment provided legal advice in response to the City's concern for potential adverse impacts that could undermine the Resource Recovery and Circular Economy Act's goal of improving the diversion of recyclables from landfill. The legal advice remains unchanged since that report was released.

Blue Box Materials Going to Landfill

With limited landfill capacity remaining in Ontario, including Toronto's Green Lane Landfill which is expected to reach capacity by 2035, the Division is doing its utmost to reduce waste and encourage participation in City diversion programs. Since the transition of the residential Blue Box Program to producers, the City's ability to directly educate and influence residential recycling behaviour has become extremely limited. However, by conducting regular waste audits and monitoring litter composition, staff can better understand how not using the residential Blue Box Program may impact City services and assets.

Waste Audits

Considering that residential Blue Box tonnage represents approximately 24 per cent of the waste produced by residents, the City no longer has visibility to one-quarter of residential tonnages to understand how residents are participating in the Blue Box Program. However, staff can use waste audit data as one data point to monitor the prevalence of recycling in the garbage or organics streams. The level of "contamination"¹ in these streams will provide some insight into resident behaviour and recycling participation practices and this information could be used to inform education campaigns on not disposing of these items in the garbage or organics stream.

Historically, single family, multi-residential, and litter audits have been conducted approximately every other year, with the single family and multi-residential audits occurring on alternating years. The most recent audits included single family (2023-2024), multi-residential (2020-2022), litter (2024), and parks (2021). Staff are planning

¹ In this context, "contamination" refers to Blue Box recycling materials being misplaced in the garbage and/or organics stream.

future waste audits to take place between 2026 and 2030 in the following categories: single family, multi-residential, parks, litter, litter bin, and commercial.

If waste audits indicate an increasing presence of recyclable content in the garbage or organics streams, staff will work with Circular Materials and, if necessary, the Resource Productivity and Recovery Authority, to understand the source of the issue and determine a plan to rectify the matter. Recyclables in the garbage stream does not meet the objective of the Blue Box Regulation, nor that of the City of Toronto or Circular Materials' diversion goals.

Blue Box Materials Becoming Litter

As reported in staff report item IE27.5, considered by the Infrastructure and Environment Committee on February 25, 2026, SWMS delivers litter abatement and collection services across the city, specifically along major and minor arterial roads and collector roads. Waste, regardless of what stream it belongs in (i.e. organics, garbage or recycling), that is deposited on the ground is managed as litter and is disposed of as garbage.

SWMS does not manage litter along local roads nor conduct litter picking in residential neighbourhoods as residential streets and adjacent boulevards are not within the Divisions' litter-picking scope of service.

As the snow melted in March, SWMS staff monitored litter volumes (litter bag counts) and loose litter service requests between 2025 and 2026 that fell within its scope of service. However, litter collection volumes for January and February were significantly impacted by the Division's increased operational focus on snow clearing and salting activities, which required the temporary reallocation of staff normally assigned to litter collection.

Overall, staff have not observed a notable increase in Blue Box-related litter or complaints related to recyclables in litter at this time. Street sweepings and spring clean-up activities began in late March and will continue until late April or early May. The results of those operations were not complete in time for inclusion in the report.

If a resident discovers recycling-related litter, action is dependent on the source of the litter. If the litter is a result of a Blue Bin left behind due to contamination or if collection was missed, the resident is to call Circular Materials to understand why the bin was left behind. The resolution of the matter is up to Circular Materials and/or their contractor to educate the resident and rectify the situation. If necessary, SWMS will also work with other Divisions as necessary to investigate and address the matter, depending on the nature and location of the litter. Furthermore, as noted above, the Division will undertake a litter audit (litter count, composition, and weight) in Fall 2026, which will provide additional data.

Ensuring recycling collection occurs as scheduled is essential to limiting the amount of litter generated by recyclable materials. City staff will continue to emphasize to Circular Materials the critical importance of maintaining an accurate and predictable collection

service standard. Missed collections impede safe sidewalk passage and increase the risk of litter, both of which are unacceptable outcomes to the City and residents.

Engagement With Circular Materials

Staff continue to engage Circular Materials as operational and customer service matters are brought forth to City staff, though the frequency and necessity of contact has reduced significantly. On March 25, 2026, the General Manager, SWMS contacted Circular Materials with a request to publish the following metrics on a regular and ongoing basis, as requested by the Infrastructure and Environment Committee: call volumes, complaint types, missed collections, collection delays, recycling rate, and contamination level for Toronto. This level of visibility to the program's operations builds resident trust and participation buy-in.

On April 13, 2026, Circular Materials responded to the General Manager, SWMS indicating confidentiality requirements in the Producer Responsibility Organizations' Common Collection System Access Agreement² that prevents them from sharing granular information. However, On April 15, 2026, Circular Materials provided City staff with data related to resident call volumes, missed collections, issued service alerts, and contamination. Please see Attachment 2 for Circular Materials' Blue Box Program data.

Public Space Recycling

Public space is not an eligible source³ covered by [O.Reg 391/21: Blue Box](#). The Division continues to manage waste collected from public space litter and parks recycling bins. Due to extremely high levels of contamination, most of the recycling collected from public space bins is landfilled.

Under the transitioned residential Blue Box Program, more materials, including hot beverage paper cups (i.e. coffee cups) and black plastic takeout containers can be recycled from eligible sources. Staff will audit public space recycling bins to determine if residents extend their behaviour change to non-eligible sources (i.e. areas that are not covered by *O. Reg. 391/21: Blue Box* including public spaces, commercial customers, charities, institutions, religious organizations and City facilities). Staff will audit and monitor contamination to see if it becomes low enough to start collecting and managing the materials as recycling versus landfilling. The outcome of this analysis will be included in the report to Infrastructure and Environment Committee in 2027.

² The System Access Agreement was established to meet Producer compliance and set out the administrative, operational and procurement policies and practices for the Common Collection System: https://www.circularmaterials.ca/wp-content/uploads/2025/01/Summary-of-Common-Collection-System-Access-Agreement_amended_final.pdf

³ Eligible sources include single-family households, City-serviced multi-residential buildings, schools, long-term care facilities and retirement residences serviced by the City as of December 31, 2025.

Advocacy

SWMS will continue advocacy efforts with the Province of Ontario, Circular Materials, and the Resource Productivity and Recovery Authority on the following matters:

- Litter abatement: street litter resulting from residential recycling collection practices that may create more street litter, including delayed or missed pickups, collection delays
- Accelerating the implementation of a producer-funded recycling program for all multi-residential buildings that are currently not eligible under the Blue Box Regulation ahead of the planned 2031 deferral as per the September 3, 2025 amendment that delayed the expansion of the producer-funded recycling program to multi-residential services that are not on municipal recycling collection services as of December 31, 2025
- Reducing Blue Box Materials ending up in the garbage or organics streams
- Data transparency and producer accountability
- Continuation of overflow recycling collection (i.e. collection of bagged excess recycling).

Next Steps

SWMS will continue to work closely with Circular Materials to ensure residents' recycling needs are met. Staff will also continue to monitor waste tonnages and, through waste audits, determine whether an increase in recyclable materials is present in waste streams managed by the City.

In 2027, staff will provide an update to the Infrastructure and Environment Committee on any impacts to the City that have resulted from the post-transition phase of the residential Blue Box Program for the remainder of 2026. This will include general field staff observations and whether an increase of recycling in the garbage and organics streams was experienced. The report will also include an update on advocacy efforts with the Province and discussions with the Resource Productivity and Recovery Authority on producer reporting and their approach to regulatory compliance.

As requested by City Council at their November 12 and 13, 2025 meeting, staff will also report back to the Infrastructure and Environment Committee on the results of the review and analysis of whether to continue to provide recycling collection and management services to non-eligible sources that are not captured in Ontario Regulation 391/21: Blue Box.

CONTACT

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SIGNATURE

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ATTACHMENTS

Attachment 1: Customer Service Metrics for Q1 2026

Attachment 2: Circular Materials' Blue Box Program Data