

Hon. Todd McCarthy
Ministry of the Environment, Conservation and Parks
40 St. Clair Avenue West, 8th floor
Toronto, ON M4V 1M2
minister.mecp@ontario.ca

January 21, 2025

RE: Follow-up to Reforms to EPR legislation in Ontario – Blue Box Program

Dear Minister McCarthy,

On behalf of the Mayors and Regional Chairs of Ontario (MARCO), I am writing to express support for this government's approach to the Blue Box program, which addresses significant issues with the previous legislative framework and will lead to better overall economic and environmental outcomes for Ontarians when fully implemented by January 1, 2026.

MARCO brings together the Chairs of regional municipalities and Mayors of large, single-tier cities, representing over 10.6 million Ontarians and delivering services and infrastructure linked to Ontarians' most urgent priorities.

We understand some interested parties are seeking changes to this government's approach. **We believe these proposals could threaten the good work the provincial government has done on this file.** Municipal governments have submitted concerns with these proposals previously, as detailed in a letter from some MARCO members to Minister Khanjin dated June 21, 2024 (attached). We would like to brief you on these concerns as you assume duties on her behalf.

Municipalities support the implementation of the Blue Box program as planned and approved by the provincial government. Municipalities also support maintaining a competitive marketplace for multiple Producer Responsibility Organizations (PROs), strong collection targets, oversight and enforcement. The Blue Box regulation reflects robust and transparent consultations, a fair and reasonable balance of stakeholder input, and significant stakeholder engagement, including a thorough examination by Special Advisor David Lindsay and a subsequent mediation process. It should be fully implemented by January 1, 2026.

Meanwhile, some producer organizations are seeking changes to the government's approach. As detailed in the attached letter, **those proposed changes could backslide program performance, increase costs, and stagnate innovation**, at a time when Ontarians are deeply concerned about cost of living.

Municipal staff have met with the parties proposing changes and are concerned about a lack of supporting data or rationale for the changes being sought. We understand the Ministry is undertaking a study through Dillon Consulting and we would welcome the results of this study being made public and the opportunity for feedback.

Municipal governments remain key participants in the curbside recycling system. Decisions about how recycling is collected and managed affect the entire waste management system, including organics diversion, litter management and garbage disposal, for which municipal governments remain responsible. For example, some producer decisions create challenges for municipalities, including higher costs to service ineligible sources, such as small businesses. These costs can force municipalities to either raise property taxes or stop collecting from these sources—which means higher taxes for Ontarians and worse environmental outcomes. **For an effective system, all parties need to work together cooperatively.**

We support the current regulation with producer accountability, and do not support a monopoly plan-based approach. We respectfully request that the Ministry proceed with the planned implementation of the Blue Box program and reject proposals that would disrupt its effectiveness or increase costs for Ontarians.

We would welcome an opportunity to discuss these matters with you further to ensure that the interests of municipalities and Ontarians are fully considered. For questions, please contact Executive Director Margot Cragg at info@marcontario.ca or 519-505-2861.

Thank you in advance for your thoughtful consideration in this matter. We look forward to working with you to make life better for the over 10.6 million Ontarians we serve.

Sincerely,



Chair Karen Redman
Chair, MARCO
Chair, Region of Waterloo

Attc Letter - 06212024 - Minister Khanjin - Regional Chairs letter Extended Producer

Cc Doug Ford, Premier of Ontario
Hon. Paul Calandra, Minister of Municipal Affairs