



November 16, 2020

Hon. Jeff Yurek, Minister
Ministry of Environment, Conservation and Parks
Minister's Office
College Park, 777 Bay Street, 5th Floor
Toronto, Ontario M7A 2J3

Dear Minister Yurek:

**RE: City of Markham Comments – ERO (Environmental Registry Ontario)
Number 019-2579**

A proposed regulation, and proposed regulatory amendments, to make producers responsible for operating Ontario's Blue Box programs

The City of Markham would like to thank the Ministry of the Environment, Conservation and Parks (the MECP) for the opportunity to comment on the Draft Blue Box Regulation to make Producers responsible for operating Ontario's Blue Box Program and shift the financial and operational responsibilities from Municipalities to Producers.

On November 30th, Markham's General Committee (which is a committee of the whole of Council) passed a resolution on the Draft Blue Box Regulation (attached as Schedule A) containing the following key request:

- **THAT the City of Markham requests that the Minister of the Environment, Conservation and Parks include Markham as an Eligible Community on the final Transition Schedule and be assigned the transition date of January 1st, 2023**

Markham is one of the most culturally diverse and fastest growing municipalities in the Greater Toronto Area with a population of over a 350,000 residents. The City is currently responsible for providing Blue Box collection services to approximately 90,000 curbside households and over 130 multi-residential buildings (approximately 18,000 units). Markham is a recognized leader in residential waste diversion and its award-winning textile recycling program has been emulated by municipalities across Canada. The City has attained significant waste diversion with one of the largest Clear Bag Garbage programs in North America and a comprehensive Green Bin strategy. Markham operates four community recycling depots which are actively utilized by over 180,000 residents each year, complementing the City's robust curbside diversion

system. These aggressive programs have resulted in Markham achieving the highest diversion rate among Canadian municipalities.

Markham supports making product Producers responsible for the costs and operational aspects associated with the recycling of their products. This will provide an incentive to improve product design, invest in local infrastructure, and create new employment opportunities. Markham, as a waste diversion leader, believes that the Draft Blue Box Regulation will have a positive impact on waste diversion in Ontario.

Markham wants to ensure that the transition of its Blue Box Recycling Program is seamless for its residents; that service levels are maintained, that costs of the program are shifted to Producers and offers the following comments on the Draft Blue Box Regulation.

In addition to the Council resolution, recommended changes are indicated below and proposed changes to the Draft Blue Box Regulation are detailed in Table A (Page 12).

1. Markham requests to be added as an Eligible Community on the final Blue Box Transition Schedule

The Blue Box Transition Schedule (attached to the Draft Blue Box Regulation) identifies York Region, not the City of Markham, as an Eligible Community to transition Blue Box collection services to Producer responsibility.

York Region operates as a two-tier municipal waste management system. As set out in the *Municipal Act, 2001*, York Region has exclusive jurisdictional responsibility for waste management (excluding waste collection), and Markham has exclusive jurisdictional responsibility for waste collection.

Regarding Blue Box collection, the nine lower-tier Municipalities are responsible for the collection of Blue Box materials as well as collection-specific promotion and education. The upper-tier (York Region) is responsible for the processing and marketing of Blue Box materials.

As the City of Markham has exclusive jurisdiction over the collection of Blue Box materials, the City is formally requesting to be identified as an Eligible Community on the final Blue Box Transition Schedule, as the future transition arrangements for Markham's Blue Box collection services would be between the City and the Producers.

2. Markham requests to be assigned the transition date of January 1st, 2023

In assigning Eligible Communities and their Transition Year, the Ministry considered municipal preferences for the date of transition as per the canvassing performed by the Association of Municipalities of Ontario. Although Municipalities expressed interest in transitioning in a certain year, ultimately the Province will determine the final transition schedule.

While York Region previously indicated a preferred Transition Year of 2025, Markham Council passed a resolution reserving the option to amend Markham's Transition Date and collection service preference at any time if it is determined to be financially and operationally beneficial to the City. Transitioning earlier, on January 1st, 2023, has significant benefits for both Markham and ultimately the Producers as outlined below:

- In assigning communities their Transition Year, the Ministry considered expiry dates for service contracts to minimize financial penalties. Markham's new competitively awarded contract to collect recyclables is currently in place as are opportunities to use the existing contractor (Miller Waste Systems);
- Markham's new collection contract provides for the separate collection of Blue Box recyclables and the co-collection of waste and green bin materials and is easily severable;
- Markham's collection contract includes the eligible sources as defined by the Draft Blue Box Regulation (permanent dwellings, multi-unit residential buildings, schools) and does not have a "separate" contract for different eligible sources;
- Markham is located in the same geographic catchment as the City of Toronto (sharing a northern border along Steeles Avenue), which is scheduled to transition in 2023;
- Markham has the financial resources and transition expertise (experienced staff, legal resources) to ensure a seamless, successful transition.

As indicated, Markham supports transitioning on January 1st, 2023 and is well positioned to meet this Transition Date. If Markham's Blue Box Recycling Program transitions in 2023, Producers will gain three years of first-hand experience with arguably the most comprehensive municipal collection system in the Province.

Markham also requests that if there is any difficulty in accommodating this request, that Ministry staff contact the City at the contact information provided on Page 11.

3. Markham requests that the eligible sources, as indicated by the Draft Blue Box Regulation, be expanded to include depots in communities with curbside Blue Box collection, municipal facilities (including public-facing community facilities such as libraries, community centres and arenas), all public spaces, Blue Boxes located at Canada Post super mailboxes, and small retail businesses within Business Improvement Areas

Markham residents have previously expressed frustration with not being able to recycle while on the go, out in the community.

For decades, Markham has aggressively worked to expand recycling opportunities across the community including recycling at transit stops, multi-residential buildings, primary schools, super mailboxes, places of worship, municipal facilities, historical Business Improvement Areas (BIA) and our many public parks.

In addition, the role of urban recycling depots should not be underestimated. Markham operates four recycling depots imbedded in the community. For years, Markham residents have been utilizing our depots to recycle Blue Box recyclables. Community recycling depots increase diversion by providing easy recycling of oversized cardboard, Styrofoam and plastic film. The current policy intent though the regulation is that, where Municipalities have curbside collection of Blue Box including multi residential service, Producers would not be required to provide any additional depot collection for Blue Box items.

Markham requests that the Ministry expand the list of eligible sources to include: depots in communities with curbside Blue Box collection, municipal facilities (city halls and offices) including public-facing community facilities (libraries, community centres and arenas), all public spaces including all parks/playgrounds and Blue Boxes located at Canada Post super mailboxes, as well as small retail businesses within BIAs.

After transition, Producers should service recycling depots that collect Blue Box materials in conjunction with curbside collection. Depots are an excellent source for clean, marketable materials and allow for cost-effective bulk collection.

Markham believes that the final regulation should include these additional eligible sources, as it is important that recycling opportunities are in place wherever residents live, learn, work and play.

If recycling services from these locations are not incorporated into the regulation, the cost to manage recycling in public space and litter will be borne by residents. Residents should not be required to pay for the end-of-life management of materials that they consume while away from home.

If Producers have incorporated the cost of the end-of-life management of a material into their product pricing, they must be responsible to recover that material, regardless of the location in which it was consumed by the resident.

4. Markham requests that the eligible sources, as indicated by the Draft Blue Box Regulation, be expanded to include BIA small businesses receiving curbside collection service

Markham's historic downtowns currently receive weekly curbside collection services as there is limited space for bulk collection containers. These areas also feature a mixture of residential apartments located above small retail establishments.

Markham is requesting that curbside collection of recycling continue in BIAs at that BIA small businesses are included as an eligible source in the final Blue Box Regulation. This important service increases diversion in these unique business areas.

5. Markham requests that the obligations for collection after the transition period (2026+) be equal to or exceed the service standards applicable in transitioning communities on August 15, 2019, specifically, increase Blue Box collection from every other week to weekly collection

Markham has been a diversion leader in Ontario for many years. In 2019, York Region reported that Markham achieved a net diversion rate of 72% (and a municipal curbside diversion rate of 81%) as a part of the Region's annual WDO submission. The City's high diversion rate is supported by recycling service levels that collect Blue Boxes weekly while garbage is collected bi-weekly in clear bags.

Markham has identified that program accessibility directly correlates to participation. Convenient access for residents is the fundamental driving factor of a successful diversion program. Markham's extensive experience and knowledge of this customer base has shown that services must be convenient, or residents will not participate.

Markham maintains the position that strong Blue Box Program participation and diversion requires a convenient collection system, which collects recycling more frequently than garbage. In urban/suburban communities like Markham, where density is increasing and the average home size is decreasing, the useable space to store Blue Box materials is becoming more limited.

Obligating the Producers to collect recycling every other week after transition would inconvenience residents and may negatively affect the Producers diversion efforts. The regulation must ensure Producers match, at a minimum, the current frequency of recycling collection in Markham – weekly for single-family homes and multi-residential buildings, depending on their infrastructure and needs. To avoid confusion for residents, Blue Box collection days should align with Green Bin and garbage collection days and should be provided on the same weekly schedule as the other collection services provided by a municipality. Additionally, Markham has identified that avoiding service delivery on Mondays minimizes the need to shift collection days for residents due to statutory holidays. This scheduling technique further alleviates resident confusion, reduces public promotion and advertisement costs and contributes to better diversion.

Lastly, Markham supports the concept that if Producers can penalize for contamination (assuming Municipalities administer the service on behalf of Producers), then Municipalities should be able to charge fees or penalties to the Producers that are tied to the amount of obligated packaging remaining in the garbage stream or in the Green Bin.

Markham requests that the obligations for collection after the transition period (2026+) equal or exceed the service standards applicable in transitioning communities on August 15, 2019 including:

- Blue Box collection service frequency should be weekly;

- Blue Box collection days should align Green Bin and garbage collection days and be collected on the same schedule as other collection services; and
- Municipalities be permitted to charge fees or penalties to Producers for packaging that “backslides” into the garbage or Green Bins streams

6. Markham requests a competitive environment for collection service providers

As outlined in the Draft Blue Box Regulation, Producers can organize and manage the Blue Box material recovery system comprised of collection and processing, or contract with a Producer Responsibility Organizations (or “PRO”s) to do so on their behalf.

Markham requests the Minister of the Environment, Conservation and Parks requires a system of multiple service providers broken down by municipality or geographic area in the province to ensure a competitive environment for collection service delivery.

Markham believes a competitive environment for service providers is integral to ensuring the successful transition of Blue Box Program responsibility to the Producers while maintaining the strong service levels currently being provided by Municipalities. For many years, Markham has expected and received excellent service delivery by Miller Waste Systems and the City supports a future Blue Box Program where those service expectations continue to be met.

7. Markham requests that the Producers be required to provide annual diversion data to municipalities

Markham contends that successful waste diversion is the result of an engaged community. Municipalities support retaining the ability to accurately measure waste diversion performance and to communicate with their residents on the success of their diversion efforts.

8. Markham supports the accepted Blue Box materials as defined by the Draft Blue Box Regulation

Markham strongly supports the Province’s move to include an expanded list of products and packaging as designated materials under the Draft Blue Box Regulation. The transitioned Blue Box will include a number of items that many municipal programs do not currently collect, such as rigid and flexible plastic packaging products and certain single use items. These new material categories will expand the range of products that Markham residents can recycle and increase diversion from landfill.

In addition, other policy tools and incentives to promote the use of more recycled content in products and packaging should be required, including incentives to reduce and redesign products and packaging.

9. Markham supports the standardization of the Blue Box Program

Over the years, Markham has witnessed increasing consumer confusion concerning Blue Box recycling. Variation in the types of materials accepted in Blue Box Programs across Ontario has fueled this confusion. Markham applauds the standardization of the Blue Box Program as indicated in the Draft Blue Box Regulation, as this should significantly improve our residents' understanding of what can be recycled.

Markham encourages the Ministry to formalize regulations for improving Industrial, Commercial and Institutional (IC&I) recycling programs in Ontario as soon as possible. Markham supports allowing Municipalities to comment on any future draft regulation and requests that materials accepted under the IC&I recycling programs align with the new residential Blue Box Program.

10. The Common Collection System should allow municipalities to use their preferred collection receptacle

Litter comprised of packaging products is of significant concern for Markham residents. Municipal audits have indicated that a major source of community litter is from overflowing or improperly loaded Blue Boxes.

As such, it should be noted that any effective litter reduction strategy should allow residents to use Blue Bags to contain and set out recyclable materials. Allowing residents to purchase and use Blue Bags for their recycling has many benefits for both residents and Producers. Blue Bags are:

- the most effective receptacle to minimize contamination and increase market revenue;
- the least expensive receptacle to provide to residents;
- scalable and provides unlimited capacity for recycling;
- the most convenient receptacle for the high-density built form;
- already being used to line public space recycling containers for ease of collection

When compared to the large Carts deployed by several urban Municipalities, Blue Bags are significantly more cost effective to procure and deliver as well as much easier for residents to store and take to the curb. Carts are also much more difficult to visually audit for contamination, while Blue Bags allow collection service providers to easily identify contaminated set outs, which can be tagged and left behind. If Producers are keen to limit contamination and maximize the recovery of their products, Blue Bags should be considered as the optimal receptacle.

To ensure flexibility for the inclusion of Blue Bags as a receptacle under the Common Collection System, the final Blue Box Regulation should require Producers

to incorporate state-of-the-art bag-breaking technology as a component of their material recovery facilities.

Markham recommends that Producers be encouraged to develop a Blue Box receptacle delivery system utilizing existing municipal infrastructure to ensure effective and accessible Blue Box receptacle distribution system for residents.

11. The Common Collection System should promote curbside collection versus alternate collection systems as the preferred service delivery method

As per the Draft Blue Box Regulations, the Common Collection System must be implemented following the transition period, once Producers have complete control over the Blue Box Program in 2026. The Common Collection System will be the same for all residents across Ontario and will: include a collective list of acceptable materials, dictate service levels (e.g. collection frequency and required receptacle), and identify the eligible sources which will receive collection services.

The Province has proposed that Producers will also have the option to remove their materials from the Common Collection System and use an alternative collection system to recover their products. However, before any materials are removed from the Common Collection System, Producers will have to demonstrate that they can meet their targets through the proposed alternative channel.

Markham appreciates the consideration of alternative collection channels and acknowledges their benefits given the appropriate circumstances. However, the City believes that the primary method of collection for all Blue Box materials should be through the curbside collection system used by the vast majority of Ontario residents.

Markham requests that the Province require Producers to maintain the curbside Blue Box Program as the fundamental, primary method of recycling collection in Ontario. Alternative collection systems that do not negatively affect accessibility and convenience for residents should be allowable under the regulation, but should operate as complimentary systems to curbside collection.

12. Need for continued, comprehensive promotion and education in multiple languages

The vast array of products and packaging in the Ontario marketplace has presented a challenge for residents and has required municipalities to fill the role of public educator. Municipalities have filled this role commendably for many years, and have learned many valuable lessons because of this experience.

We understand that achieving waste diversion targets is entirely dependent on the active and effective participation of all residents. The use of effective and ongoing promotion and education tactics is critical to foster participation, meet diversion

targets, reduce contamination and increase the capture of cleaner and better-quality materials.

Continuous multi-lingual education is an absolute necessity. Although English and French are Canada's official languages, many Ontario residents require additional translation. Markham recommends that the Province use census information to identify the top languages spoken in the Province, by geographic area, and require Producers to translate their promotion and education materials accordingly.

Standardization of the list of accepted Blue Box materials will significantly assist Producers in developing their baseline communications. However, Producers should be mindful of their audiences and incorporate complementary and regionally informed tactics as well.

Markham also supports requiring Producers to work cooperatively with Municipalities to ensure the promotion and education provided by Producers related to the Blue Box Program compliments the promotion and education provided by Municipalities related to other waste collection services.

Markham is requesting that the final Blue Box Regulations require Producers to create and invest in multi-lingual, comprehensive, regionally informed promotion and education activities during the transition phase and post-transition, under the Common Collection System and work cooperatively with Municipalities when disseminating program information to the public.

13. During the transition period, the Producers should be encouraged to maximize funding to all non-transitioned Blue Box Programs

During the transition period, non-transitioned municipalities will continue to receive WDO funding based on the DataCall information. Currently, municipalities receive approximately 40% of their Blue Box Program costs. Markham requests that Producers maximize funding to all non-transitioned Blue Box Programs, up to 100%, during the transition period. These costs can be identified and funded through the existing WDO DataCall process.

If the Province's ultimate goal is to require Producers to be responsible for their products, it should not permit the logistical process of transition to absolve Producers of their financial obligation to fully pay for the recovery of their products.

14. Province should consider additional measures to increase diversion in Ontario

While making Producers responsible for the Blue Box Program in Ontario is significant, this should be complimented by additional measures to foster innovation and improve waste diversion in the Province.

Markham recommends that the Province develop regulations and legislation designed to:

- increase waste diversion from the industrial, commercial and institutional sector (IC&I), including waste generated by construction and demolition industry;
- prioritize reduce and reuse initiatives;
- strategically implement disposal bans for designated materials (Markham has successfully implemented curbside disposal bans on textiles, batteries, electronic waste, hazardous waste and grass clippings);
- to designate additional materials under Extended Producer Responsibility programs, such as mattresses, textiles, cigarette waste and infant car seats

Additionally, Markham supports a regulated process to continually review and assess for performance of the Producer-led Blue Box system.

15. Markham supports the Draft Blue Box Regulation approach to minimize incineration and promote energy from waste process

The Draft Blue Box Regulation identifies outcomes that would not be eligible to count toward the Producers management requirements. Of particular note is the stance taken by the Province towards incineration. If a registered processor sends Blue Box materials to a landfill or an incinerator, the weight of the Blue Box materials cannot be used by a Producer to meet the Producer's management requirement.

Markham supports that the Producer's recovery targets should be based on the Blue Box material that is marketed (i.e. bales of material sold) and exclude energy from waste or the use of materials for fuels as part of the diversion target.

16. Markham supports a regulated Blue Box Program review process for continuous improvement

Markham requests that the Draft Blue Regulation require scheduled, comprehensive reviews of the new Blue Box Program every five years following the complete transition of each Eligible Community. The review process should allow for input from Municipalities and other key stakeholders with the intended goal of continuously improving program performance.

In addition to the comments above, please refer to Table A, Proposed Amendments for ERO (Environmental Registry Ontario) Number 019-2579 – A proposed regulation, and proposed regulatory amendments, to make producers responsible for operating Ontario's Blue Box programs (see Page 12).

The Ministry of the Environment, Conservation and Parks staff are to be applauded for advancing the development Extended Producer Responsibility in Ontario. Markham Council recognizes the Province has numerous critical priorities as it deals with the

Covid-19 global pandemic and appreciate their continued dedication to advance new Blue Box Program legislation. While Markham supports these regulations that address the recycling of single-use plastics and litter control, a key challenge continues to be the modification of resident behaviour in reducing the consumption of single-use plastics.

Markham would like to thank the Ministry for considering these comments. If you have any questions or would like to discuss further, please contact Phoebe Fu, Director of Environmental Services at pfu@markham.ca

Sincerely,

Kimberley Kitteringham
Director, Legislative Services & Communications
The City of Markham

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Table A

Proposed Amendments for ERO (Environmental Registry Ontario) Number 019-2579

A proposed regulation, and proposed regulatory amendments, to make producers responsible for operating Ontario's Blue Box programs

| Reference (Part #, Section #) | Draft Blue Box Regulation | Recommended Amendments |
|--|---|---|
| Part 1, Section 1 | "facility" means, (a) a building that contains more than one dwelling unit but that is not a residence, (b) a long-term care home licensed under the Long-Term Care Homes Act, 2007, (c) a retirement home licensed under the Retirement Homes Act, 2010, or (d) a public school or private school under the Education Act; | Add: (e) municipal facilities such as city halls and offices (f) public-facing facilities such as libraries, community centres and arenas (g) recycling depots |
| Part 1, Section 1 | "public space" means any land in any park, playground, or any outdoor area which is owned by, or made available by, a municipality, and that is located in a business improvement area designated under the Municipal Act, 2001 or by a by-law made under the City of Toronto Act, 2006 | Change: "public space" means any land in any park, playground, or any outdoor area which is owned by, or made available by, a municipality |
| Part 1, Section 1 | "residence" means, (a) a single-unit residential dwelling, including a seasonal residential dwelling, in an eligible community, or (b) a building that contains more than one dwelling unit but receives garbage collection at the same frequency as single-unit residential dwellings in an eligible community; | Add: (c) small retail businesses located in a business improvement area (d) outdoor area adjacent to a Canada Post super mailbox |
| Part 4, Section 19 | A producer may provide either depot or curbside collection of Blue Box material to residences assigned to the producer under | Delete section. |

| Reference (Part #, Section #) | Draft Blue Box Regulation | Recommended Amendments |
|-------------------------------------|---|--|
| | the annual allocation table that are not required to be provided curbside collection under section 18. | Depot collection is to be included as an eligible source in Municipalities that provides curbside collection |
| Part 4, Section 20 | <p>A producer who provides curbside collection shall,</p> <ul style="list-style-type: none"> (a) collect Blue Box material at least every other week; (b) collect in a single day all Blue Box material set out for curbside collection at an eligible source; and (c) provide Blue Box receptacles for the storage of Blue Box material until it is collected, including, <ul style="list-style-type: none"> (i) ensuring that each residence has a Blue Box receptacle before the day on which the producer commences collecting from that residence, and (ii) providing at least one replacement Blue Box receptacle each year, to any residence, upon request of a person residing at the residence, provided within one week of the request. | <p>Change:</p> <ul style="list-style-type: none"> (a) collect Blue Box materials at the frequency they were collected under the eligible community's Blue Box system; <p>Add:</p> <ul style="list-style-type: none"> (d) allow eligible communities to use bags as a preferred Blue Box receptacle under the common collection system following transition, even if an eligible community did not use bags as a Blue Box receptacle under their former Blue Box system; (e) ensure they are able to collect and process Blue Box material in bags under the common collection system following transition; (f) collect Blue Box materials on same collection days as green bin and garbage collection days (g) collect Blue Box materials on the same weekly schedule as other collection services provided by the municipality |
| Part 4, Section 21 | A producer who provides depot collection in a municipality, local services board or reserve shall, | <p>Change:</p> <ul style="list-style-type: none"> (a) provide collection for all depots accepting Blue Box materials in that |

| Reference (Part #, Section #) | Draft Blue Box Regulation | Recommended Amendments |
|-------------------------------------|---|--|
| | <p>(a) provide at least as many depots for the collection of Blue Box material as there are depots for household garbage in that municipality, local services board or reserve;</p> <p>(b) ensure the depots for the collection of Blue Box material have operating hours that are at least as accessible as the hours for depots for household garbage in that municipality, local services board or reserve;</p> <p>(c) collect the Blue Box material from the depot before the Blue Box receptacles at the depot are full; and</p> <p>(d) provide Blue Box receptacles for the storage of Blue Box material until it is collected, including,</p> <ul style="list-style-type: none"> (i) ensuring that each depot has a Blue Box receptacle before the day on which the producer commences operating the depot, and (ii) providing at least one replacement Blue Box receptacle each year, upon request by an operator of a depot, within one week of the request. | <p>municipality, local services board or reserve where curbside collection is provided;</p> <p>Add:</p> <p>(e) subsidize depot administration and staffing costs at a level that meets or exceeds the current funding levels provided under the <i>Waste Diversion Act</i> (Data Call)</p> |
| Part 7, Section 48 | <p>(1) Eligible communities that are local Municipalities and local service boards that are included in the Blue Box Transition Schedule shall register with the Authority, through the Registry, by submitting the following information, on or before April 15, 2021 about the municipality or local services board:</p> <ol style="list-style-type: none"> 1. Number of residents. 2. A list of residences, including the number and location of each residence, that, <ul style="list-style-type: none"> i. receive curbside garbage collection, or ii. are serviced by depot garbage collection. 3. A list of depots at which garbage is currently collected, including location. <p>(cont...)</p> | <p>Change:</p> <p>3. A list of depots at which <u>blue box materials</u> or garbage is currently collected, including location.</p> |

| Reference (Part #, Section #) | Draft Blue Box Regulation | Recommended Amendments |
|--|----------------------------------|--|
| Blue Box Transition Schedule | | Add: Under “Eligible Community” – Markham, City of Under “Transition Year” – 2023 |