

December 24, 2019



Re: Transition of the Blue Box Program to Full Producer Responsibility

Dear Mayor and Council:

You have been asked by AMO to endorse a certain resolution with regards to the transition of the blue box program to full producer responsibility. On behalf of the Bluewater Recycling Association, I would like you to consider the following before making your final decision.

As you should know, the Province has enacted new legislation which has recently begun the process to transition the Blue Box Program to Full Producer Responsibility. The actual transition is scheduled to occur between January 1, 2023 and December 31, 2025. You should have received a request from the AMO President to provide some direction on your intentions.

The Bluewater Recycling Association was created by and for communities like yours 30 years ago to manage the Blue Box Program on behalf of, and in cooperation with, the member municipalities. We have accomplished a lot together and this transition has to potential to do even more, if done right.

Your current commitments with the Association allow for a transition to occur at any time in the three-year window as members can leave the Association at any time by giving notice by June 30 of any year for departure anytime the following year. Other commitments related to waste collection may apply but they will not prevent you from transitioning if you wish to do so.

At this time, while we expect to recommend our members to transition, we cannot categorically do so in full conscience until the regulation is written so that we can fully comprehend the impact of such regulation. As they say: "the pudding is in the details."

In choosing a transition date, you have the flexibility to choose any date you wish. As tempting as it might be to be first to transition in January 2023 and shed that cost off your financial statements, let us remind you that a Provincial election is scheduled for June 2, 2022 which may bring about last minute changes and you will be busy introducing the newly elected councils from the October 24, 2022 Municipal election.

Generally, we would advise against a January 1 transition date in any year as it is historically the busiest time of the year in terms of recycling volume. It is also the worst time of the year for the variable weather conditions that have the potential to bring about collection cancellations. As such, January is the worst time to possibly change service provider and/or service delivery details.

Normally we would recommend a spring or fall transition as the volumes are reasonable, the weather is not a factor, the staff is available, and the residents are not

on vacation. The best dates appear to be May 1, 2023, April 1, 2024, or September 1, 2025. There is one more date that falls outside this advice and it is July 1, 2024. It is the midpoint in the transition, and it allows the service provider to reach seasonal residents, but it is at the expense of those permanent residents who may be on vacation.

Our members have collaborated and invested together since 1989. All of your achievements have been the results of a combined effort. Our systems are highly integrated as you share programs, equipment, and staffs that are all interdependent. The transition will bring about change. What the changes will be remains unknown until the regulation is written and the producers determine how they wish to meet their obligations. Regardless of the final details, we would highly recommend that all members transition at the same time. In order to plan and accommodate such a transparent transition we believe the best time for everyone to transition will be April 1, 2024.

The Association intends to continue to provide Blue Box Program services into and after the Transition to Full Producer Responsibility assuming mutually agreeable commercial terms with the Producers. You may want the Association to continue providing the services to:

- 1) Maintain services for those who may be excluded from the new regulations. At this time it is expected that institutional, commercial, and industrial locations will be excluded from the system. This means arenas, libraries, municipal buildings, hospitals, police station, places of worship, retirement homes, campgrounds, downtown businesses, and larger industries will need to find alternate service providers.
- 2) Maintain the current waste collection discounted rates resulting from the efficiency of co-collecting waste and recyclables in the same truck at the same time as currently done in over 91% of our member households.
- 3) Know that new wheelie bins will always be in inventory to delivery to new homes along with the parts and service available to repair any defective ones.
- 4) Continue to have access to Other Diversion Services
- 5) Depend on reliable reachable local service talking to people you know and they know you and your residents as you have for that last three decades.
- 6) Maximize and utilize in the \$30 Million in assets you have built over the years to guarantee the uninterrupted service you have become accustomed to.
- 7) Know that your residents are serviced using the cleanest fleet in the industry powered by Natural Gas and positioned to convert to electricity when it is ready and available.
- 8) Keep jobs locally that benefit the local economy recycling tax dollars.



The members have benefitted from superior award winning recycling services for decades because they have worked together using a unique cooperative model to maximize economies of scale that would not be possible individually. As such, we would recommend that all members consider making the transition together.

Consider the enclosed alternate resolution when responding to AMO and the Ministry of the Environment.

Yours truly,

In this cleaner environment.

Francis Veilleux
President

Bluewater Recycling Association Suggested Resolution

Resolution on Transition to Full Producer Responsibility

WHEREAS the amount of single-use plastics leaking into our lakes, rivers, waterways is a growing area of public concern;

WHEREAS reducing the waste we generate and reincorporating valuable resources from our waste stream into new goods can reduce GHGs significantly;

WHEREAS the transition to full producer responsibility for packaging, paper and paper products is critical to reducing waste, improving recycling and driving better economic and environmental outcomes;

WHEREAS the move to a circular economy is a global movement, and that the transition of Blue Box programs would go a long way toward this outcome;

WHEREAS the municipality is a member of the Bluewater Recycling Association which has been providing the Blue Box program for the last 30 years to its member municipalities;

WHEREAS the Blue Box program is one of many resource management services that is part of an integrated system that the Association provides the municipality;

WHEREAS the **Municipality of X** is supportive of a timely, seamless and successful transition of Blue Box programs to full financial and operational responsibility by producers of packaging, paper and paper products;

AND WHEREAS the Association of Municipalities of Ontario has requested municipal governments with Blue Box programs to provide an indication of the best date to transition our Blue Box program to full producer responsibility;

THEREFORE BE IT RESOLVED:

THAT the **Municipality of X** would like to transition their Blue Box program to full producer responsibility April 1, 2024, preferably at the same time as all the other Bluewater Recycling Association.

AND THAT this decision is based on the following rationale:

1. 2023 is too close to the Provincial and Municipal election to plan a seamless transition.
2. January of any year is our busiest time of the year in terms of volume and the weather is not always cooperative making it the worst time of the year to transition.
3. April 1, 2024 date is more suitable if a new service provider is taking over as it removes the uncertainties associated with weather events and our busiest holiday season (January) and our seasonal residents are captive.
4. The recycling service is integrated (co-collection) with the waste collection service in most areas serviced with the same truck at the same time which may be substantially impacted by the transition.
5. The Municipality is part of a cooperative which has invested substantial capital resources that need to be optimized and considered as part of any new system.

AND THAT the **Municipality of X** through the **Bluewater Recycling Association** would be interested in providing collection, processing, marketing, and other services to Producers should we be able to arrive at mutually agreeable commercial terms.

AND FURTHER THAT any questions regarding this resolution can be directed to **Jane Doe, City Manager at xxx-xxx-xxxx or jane.doe@municipalityx.ca and Francis Veilleux, President of the Bluewater Recycling Association at 519-228-6678 or francis@bra.org**

AND FURTHER THAT the resolution be forwarded to the Association of Municipalities of Ontario and the Ontario Ministry of the Environment, Conservation and Parks.