

September 17, 2025

To:

City of Windsor	Steve Vlachodimos, Clerk svlachodimos@citywindsor.ca
County of Essex	Katherine Hebert, Clerk khebert@countyofessex.ca
Town of Amherstburg	Kevin Fox, Clerk kfox@amherstburg.ca
Town of Essex	Joseph Malandrucolo, Town Solicitor, Legal and Legislative Services/Clerk jmalandrucolo@essex.ca
Town of Kingsville	Angela Toole, Acting Clerk atoole@kingsville.ca
Municipality of Lakeshore	Brianna Coughlin, Clerk bcoughlin@lakeshore.ca
Town of LaSalle	Jennifer Astrologo, Director of Council Services/Clerk jastrologo@lasalle.ca
Municipality of Leamington	Brenda Percy, Clerk bpercy@leamington.ca
Town of Tecumseh	Robert Auger, Director of Corporate Services/Clerk rauger@tecumseh.ca

**Re: Resolution of EWSWA Board
Circular Materials Response Re. Single-Stream Recycling**

The Essex-Windsor Solid Waste Authority (EWSWA), at its meeting held Wednesday, September 10, 2025, adopted the following resolution:

Resolution 81-2025

Moved by Mark McKenzie
Seconded by Kieran McKenzie

- **That** the Board **receive** this report for information and direct Administration to report back on the outcomes of the meetings referenced in this report at a future meeting.

- **That** the Board direct Authority Administration to provide the information included in this report to the Clerk's Department at the City of Windsor, County of Essex and seven (7) County municipalities, to be included as information to municipal staff and councils.

Carried

The EWSWA is forwarding the attached report titled "Circular Materials Response Re. Single-Stream Recycling" to formally notify all municipalities within the Essex-Windsor region of the significant changes being implemented to the residential Blue Box recycling program, effective January 1, 2026 through Circular Materials' (CM) contractor, GFL.

Although the EWSWA has repeatedly informed Circular Materials that, as the administrator of the Common Collection System, it is its responsibility to communicate these changes to municipalities, it is our understanding that this communication has not yet occurred.

While Circular Materials (CM) has advised that no direct action is required by municipalities and that they are responsible for the administration and communication of the program, the EWSWA believes it is essential that local councils and staff are fully informed of the changes and potential impacts.

Key Program Changes:

- The transition from a dual-stream box-based system to an automated cart-based, single-stream recycling system across all eligible sources;
- Distribution of standardized 95-gallon RFID-equipped carts, currently anticipated to begin in October 2025;
- Resident-owned containers and/or carts will no longer be accepted under the new system;
- Implementation of new processes for managing excess materials and for requesting additional carts.

The report provides background on discussions with CM and highlights areas of ongoing concern regarding accessibility, communication gaps, and compliance with the Blue Box Regulation.

The goal has been to ensure continued resident participation in the Blue Box program and to mitigate risks such as increased litter, improper disposal, and the unnecessary landfilling of valuable recyclable materials.

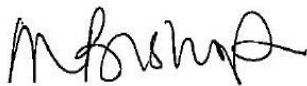
EWSWA is sharing this report in the interest of transparency and to ensure that municipal staff and councils have adequate time to review the information, identify any local implications, and raise questions or concerns as needed.

Please circulate this report to relevant staff and include it as correspondence to Council, as appropriate.

Should your municipality have specific operational or community concerns, you are encouraged to engage directly with Circular Materials or contact EWSWA Administration for support.

Thank you for your attention to this important matter.

Sincerely,



Michelle Bishop, General Manager
Email: mbishop@ewswa.org
Phone: 519-776-6441 ext. 1225

cc: Cathy Copot-Nepszy, Manager of Waste Diversion – EWSWA

Attachment: EWSWA Administrative Report – Circular Materials Response
Re. Single-Stream Recycling dated August 28, 2025



Essex-Windsor Solid Waste Authority

Administrative Report

August 28, 2025

To: The Chair and Board of the Essex-Windsor Solid Waste Authority

From: Michelle Bishop, General Manager
Catharine Copot-Nepszy, Manager of Waste Diversion

Meeting Date: Wednesday, September 10, 2025

Subject: Circular Materials Response Re. Single-Stream Recycling

Purpose

The purpose of this report is to provide information to the Board regarding discussions held with Circular Materials (CM) regarding concerns stemming from the change from a dual-stream recycling system to a single-stream recycling system effective January 1, 2026, for all Eligible Sources (ES) in the City of Windsor (Windsor) and the seven County of Essex (County) municipalities.

Background

As previously reported to the Board, CM has confirmed that the Essex-Windsor region will be changing to a cart-based single-stream recycling system in 2026. Further, Authority Administration was advised that they intend to distribute blue 95-gallon carts to households in the fall of 2025 to support their January 2026 launch. Authority Administration has previously detailed the actions taken to engage with CM's administration in an attempt to resolve several questions and concerns about the logistics and impacts of switching to a single-stream program in January 2026. This includes letters to CM officials, with the letters being signed by the Authority Chair, Vice-Chair and General Manager.

CM is ultimately responsible for administering the Common Collection System (CCS) in Ontario on behalf of producers effectively and efficiently to reach capture targets set out in the Blue Box Regulation.

On Friday, May 23, 2025, CM responded to the Authority's letter dated March 19, 2025. In addition to not providing a response to a number of concerns identified in

the letter, CM changed direction from previous communications regarding resident-owned containers and excess material.

The latest letter stated that current resident-owned carts, even if they are compatible with their automated collection vehicles, will not be serviced in their new 2026 collection program. CM's new carts will include RFID identification and tracking systems, etc.

The letter also stated that their 95-gallon carts offer adequate storage, "which is greater than the current blue box storage capacity of four blue boxes over a two-week collection cycle." Further noted was that households that periodically generate more material than the 95-gallon cart can store their excess material until the next collection. Those who regularly exceed the 95-gallon cart capacity may contact GFL for an assessment to determine eligibility for a second cart.

Given the above, Administration noted concerns with CM's approach and its ability to meet the requirements set out in the regulation as follows:

1. Provision of adequate blue box receptacles

Under the Blue Box Regulation, CM is required to:

22.(c) provide blue box receptacles for the storage of blue box material at the residence until the blue box material is collected and, when it has provided such receptacles, shall

*(i) provide blue box receptacles that are appropriate for the residence, **including with respect to size** [emphasis added],*

*(iii) ensure that each residence has a blue box receptacle that **is able to ordinarily store all of the blue box material deposited at that residence until the next collection day** [emphasis added]*

2. Collection of all blue box materials set out

Under the Blue Box Regulation, CM is required to:

*22(b) collect, in a single day, **all blue box materials set out for curbside collection at the residence** [emphasis added]*

By not allowing residents to use existing carts when the CM-issued 95-gallon cart does not meet their needs, residents will be left with excess material and without an adequate blue box receptacle.

Further, requesting that residents hold recyclables until the next collection does not fulfill the obligation to collect all blue box materials as required by legislation. While Administration is encouraged by CM and Green for Life Environmental Inc.'s (GFL) change in plan to provide an additional cart to households that regularly generate excess material when qualifications are met, the process will be lengthy (over two collection cycles) and frustrating for residents, especially if they do not have storage space. In the meantime, advising residents to retain excess material is not a compliant or practical interim solution.

Lastly, CM's decision to provide only one (1), 95-gallon cart to a household does not appear to align with the regulatory requirement to provide adequate blue box receptacles, particularly with respect to accessibility. Offering only one cart size fails to account for residents with mobility limitations who may be unable to manage larger bins. This type of accessibility accommodation is a common consideration among municipalities when designing and implementing waste collection systems.

The following steps were identified to address the above concerns:

- Provide a response to CM outlining the Administration's outstanding concerns noted above.
- Authority Administration to request a meeting the Resource Productivity Recovery Authority (RPR) regarding the concerns to meet the regulatory obligations noted above.
- Authority Chair, Vice-Chair and Administration are meeting with Windsor-Tecumseh MPP Andrew Dowie, Parliamentary Assistant to the Minister of the Environment, Conservation and Parks on June 18, 2025, to discuss this topic as well as concerns related to Non-Eligible Sources (NES).

A response was sent to CM on July 2, 2025, a copy has been included as an attachment.

The meeting was held with MPP Dowie on June 18 as noted above. The meeting was positive, and MPP Dowie was receptive to the Authority's concerns and committed to follow-up discussions.

With the information provided below, Authority Administration has not yet requested a meeting with the RPR.

Discussion

On July 16, 2025, CM staff requested a meeting with Authority Administration to attempt to address the items noted above through recent communication to CM. The following summarizes the discussions that took place.

Cart Compatibility

- CM has confirmed implementation of 95-gallon carts equipped with RFID tags to facilitate automated collection and tracking.
- CM will not permit the use of non-compatible carts in the program; only their standardized carts will be serviced, mirroring the approach used in the EWSWA Green Bin Program (GBP).
- CM acknowledged their responsibility to provide clear and timely communication to residents regarding this transition.

Requests for Additional Carts

- A process will be established between CM and the contractor (GFL) to assess and validate household requests for an additional cart.
- Households will be evaluated over two collection cycles to determine eligibility for a second cart.
- If eligibility is confirmed, the additional cart will be provided at no cost to the resident.
- CM to confirm whether additional carts will be delivered directly to the residence or if residents will be required to pick them up.
- Authority Administration has identified that for households who currently recycle close to a 95-gallon cart worth of material, it will be a challenge to nestle rigid fibre materials (e.g., cardboard) with the various shapes and materials of container materials effectively over a two-week cycle, such that these materials fit within one (1) 95-gallon cart.

Blue Box (BB) Repair and Request Program (New)

- The contractor (GFL) will be responsible for maintaining the condition of the carts.
- A repair/replacement program similar to the current EWSWA Green Bin Program will be implemented, though specific details have not yet been provided.

Resident-Owned Carts

- CM continues to state that they are not responsible for the end-of-life management of existing carts/bins that residents are currently using for this program.
- CM has no precedent for addressing these items from other municipalities.
- While GFL stated that they may consider collecting boxes, it is still to be determined whether they will retrieve old/unwanted carts from residents at the time of new cart delivery.
- Authority Administration has advised CM that they will need to communicate clearly to residents on why they can't use their existing cart, which may look the same as the new CM cart for the 2026 program.

Excess Material Management

- Residents must adhere to CM's program guidelines, and materials must be placed within the cart to be eligible for collection.
- Additional cart eligibility will be assessed over two collection cycles, with a supervisor attending on collection days to observe household set-out.

- Authority Administration expressed concern regarding delays between assessment and resident notification, including:
 - Potential for increased litter;
 - Disposal of valuable recyclables in the garbage stream;
 - Burden on residents to store excess materials while awaiting approval; and
 - Frustrated residents may stop participating in diversion programming.
- CM will reinforce through communication that excess materials, such as bundled cardboard that doesn't fit in the cart, will not be collected.
- CM suggested the use of Depots for overflow materials; however, Authority Administration noted this may not be a viable option if funding for "Convenience Depots" from CM is not approved again in 2026. Authority Administration is still waiting for CM to confirm if they want to engage in an agreement to use Authority Depots for their program.

Automated Collection & Operational Goals

- The transition to a cart-based system reinforces that the use of automated collection methods is the future direction of residential waste management.
- Primary objective is to: reduce injuries associated with drivers exiting/entering vehicles and/or manual lifting, improve driver recruitment and retention to alleviate manpower challenges in the waste collection industry.
- CM has recently identified that OOPS stickers will not be utilized in the cart-based program and that AI-based contamination monitoring is being tested across multiple vendors.

Accessibility

- Residents requiring accommodations may contact GFL directly; this will be included in CM's communications.
- The CM/RLG approach to accessibility requests will align with the municipality's existing practices, and accommodations provided for garbage/organics.
- Contractors have been receptive to accessibility needs, and no major issues have been reported or escalated.

Communications

- Authority Administration requested to be kept informed of all CM communications on the Blue Box program that services Essex-Windsor.
- CM will ensure that messaging and updates will be issued directly to local municipalities so that they are informed.

- Authority Administration reminded CM that relevant municipal contacts were included in RPPRA transition documents.

The meeting concluded with Authority Administration requesting that CM provide a follow-up email confirming the above, as well as addressing all outstanding responses and clarifications.

Although Administration has followed up with CM regarding the written response, as of the writing of this report, none has been received. Given that CM has previously changed course even after providing a written response, Administration does not place full confidence in the consistency of their commitments.

Next Steps:

As the significant program change is scheduled to commence on January 1, 2026, and while Authority Administration has included updates to municipal staff at the regularly scheduled Municipal Working Group meetings. Authority Administration is not aware of CM communicating directly with the City or any of the seven County municipalities as of late regarding this change, despite previous requests for them to do so.

Therefore, Authority Administration is requesting direction from the Board to officially notify municipalities regarding this upcoming program change and forward correspondence to the Clerks' Departments of the City and each of the seven County municipalities. This will ensure that they are formally advised of the upcoming program changes and are provided with adequate time to contact CM directly with any municipality-specific questions or concerns that may not have been addressed through the Municipal Working Group or internal administrative discussions.

CM has stated on multiple occasions that they are ultimately responsible for the program and all program communications and that no action is required from the municipalities. However, having administered the Blue Box program to local municipalities for several decades, Authority Administration continues to believe it is essential that municipalities are fully aware of the upcoming changes in case they have any unique challenges or concerns.

Financial Implications

As previously communicated, there are no immediate financial implications at this time, however, it should be noted that any recyclable material left curbside has a strong likelihood of being set out with residential mixed waste (garbage). This will result in increased tipping fees for the City of Windsor and seven County of Essex local municipalities, as well as a potential increase in collection costs.

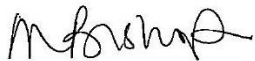
Further, since the majority of mixed waste is consolidated at the Authority's Transfer Stations, additional costs will be incurred to needlessly transport this material, which will ultimately consume expensive airspace at the Essex-Windsor Regional Landfill.

Recommendation

That the Board **receive** this report for information and direct Administration to report back on the outcomes of the meetings referenced in this report at a future meeting.

That the Board **direct** Authority Administration to provide the information included in this report to the Clerk's Department at the City of Windsor, County of Essex and seven (7) County Municipalities, to be included as information to municipal staff and councils.

Submitted By



Michelle Bishop, General Manager

Attachments:

- Letter to Circular Materials dated July 2, 2025

July 2, 2025

Sent by email: allen.langdon@circularmaterials.ca

Circular Materials Ontario
Attention: Allen Langdon, President & CEO
700-1 St. Clair Avenue
Toronto, ON
M4V 1K6

Dear Mr. Langdon,

Subject: Request for Additional Information Regarding Transition to Single-Stream Recycling Collection in Essex-Windsor

Thank you for your letter dated May 23, 2025, in response to our earlier correspondence regarding the transition of the Blue Box Program. We appreciate your engagement and the information provided; however, several significant concerns remain unresolved.

Resident-Owned Carts and Communication Inconsistencies

One of the Authority's primary concerns remains the status of resident-owned carts. As referenced in the attached correspondence from your operations team to the Authority dated March 7, 2025, it was previously confirmed that compatible, resident-owned carts would continue to be serviced under the new program. This was also communicated verbally by the Circular Materials (CM) operations team. This position is now contradicted by your most recent letter, which states that only CM-issued 95-gallon carts will be collected.

This inconsistency is deeply concerning, many Essex-Windsor residents have previously purchased carts at their own expense to support dual-stream collection and will be understandably frustrated to learn that these are now considered unusable under the new system.

As a potential resolution, the Authority recommends that residents be permitted to continue using their existing carts, provided that the carts are fully compatible with the automated collection system, which has always been the message that the Authority promoted when it administered this program. In these cases, residents would assume all responsibility for the

condition and functionality of their carts, and any damage or service issues would not be the responsibility of CM or its service providers. We believe this approach strikes a reasonable balance between operational efficiency and public fairness, while also reducing unnecessary waste.

Accessibility Considerations

The uniform provision of 95-gallon carts raises accessibility concerns. Residents with mobility limitations, such as seniors, persons with disabilities, or residents with narrow access points, may be unable to use carts of this size safely or effectively. The recommendation to allow residents to continue using their existing carts could help address some of these concerns.

It is standard practice among municipalities to offer smaller receptacles or manual collection options to accommodate accessibility needs. We urge your team to integrate a formal accessibility protocol into the transition and to ensure transparent communication with both the Authority and the public about available accommodations.

Excess Material, Large Households, and Cart Capacity

While we acknowledge that the 95-gallon cart offers greater capacity than the traditional blue box, the suggestion that households with excess material should store it until the next collection is not a viable or sustainable solution. As previously noted, many households consistently generate more recycling than a single 95-gallon cart can accommodate, particularly,

- Large and multi-generational families, which naturally generate more packaging, containers, and printed paper;
- Households that experience seasonal surges in material volumes (e.g., during holidays or family events).

Under the Regulation:

- **Section 22(c)(iii)** requires that residents be provided a receptacle that can *ordinarily store all blue box material generated between collections*;
- **Section 22(b)** requires the collection of *all blue box materials set out on collection day*.

Deferring the collection of excess material or denying the use of compatible, resident-owned carts does not fulfill these obligations. While we recognize your intent to offer additional carts through a request process, the lack of clear timelines, eligibility criteria, and interim solutions is cause for concern.

Disposition of Obsolete Carts

With existing carts being rendered incompatible for use under the current direction, the Authority requests a clear and coordinated plan for addressing the thousands of resident-owned containers now considered obsolete. Some potential initiatives may include:

- Curbside collection or drop-off events for cart recycling;
- Community reuse or repurposing initiatives;
- Guidance on safe and appropriate in-home or outdoor reuse.

Municipalities and residents would benefit from consistent messaging and support on this issue.

Authority's Role in Communications

To date, the Authority has supported CM in its communications to residents regarding the transition to the new program, including helping to clarify expectations and respond to public inquiries and has remained committed to working collaboratively with your team to ensure a smooth, fair, and regulation-compliant transition. However, given the current approach outlined in your most recent response, particularly the refusal to allow use of compatible resident-owned carts, the lack of a viable interim solution for excess material, and insufficient accommodations for accessibility, the Authority cannot, in good faith, continue to support or endorse these aspects of the rollout. Doing so would conflict with our obligation to advocate for a fair, compliant, and practical system for our residents.

The Authority looks forward to your response and further discussions and collaborating with CM on communication efforts.

Should you require further information, please contact me by email at mbishop@ewswa.org or by phone at (519) 776-6441 extension 1225.

Allen Langdon, President & CEO

Circular Materials

Request for Additional Information Regarding Transition to Single-Stream Recycling
Collection in Essex-Windsor

July 2, 2025

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Sincerely,



Michelle Bishop
EWSWA General Manager



Gary McNamara
EWSWA Board Chair



Gary Kaschak
EWSWA Board Vice Chair

cc. Andrew Dowie – MPP for Windsor-Tecumseh
Resource Productivity and Recovery Authority - info@rpra.ca

Essex Windsor Solid Waste Authority (EWSWA)

Post-transition Blue Box Program Inquiries

Why Single Stream Programming

Q. What is the rationale for shifting to a single stream cart-based recycling collection system? Residents, board members, partners, etc. will want to understand these benefits.

A. A shift to single stream collection service is aimed at increasing convenience and resident participation. This approach increases blue box material capture at the curb while improving collection efficiency and safety for drivers.

Single Stream Programming Delay

Q. EWSWA is requesting that Circular Materials (CM) as the Common Collection System (CCS) Administrator investigate opportunities to delay the transition of blue box recycling services from dual stream manual collection to single stream automated collection from January 2026 to April 2026. EWSWA will be rolling out its Green Cart program within the same timeframe as the Common Collection System (CCS) rolls out its Blue Cart program. The delay will:

- Help reduce the number of collection program changes introduced to residents within the same timeframe; and
- Allow alignment with EWSWA's waste collection calendar publication, which is April to March.

A. After careful consideration, we are confirming that a delay of moving from a dual stream to single stream recycling system is not possible. The transition of blue box recycling services to single stream automated collection will occur on January 1, 2026.

This is due to the fact that the manual dual stream trucks currently in use in EWSWA are scheduled for use elsewhere at the end of December 2025. Without access to these dual stream vehicles, it is not possible to delay EWSWA's change over to single stream carts.

Anticipated Routing Changes

Q. The city is working to eliminate waste collection in alleys with the new collection contract starting in 2025. Will CM as the CCS Administrator and RLG as the CCS Operator support the city and align recycling collection locations outside these alleys at the appropriate time?

A. CM and RLG will work with the collection contractor to align collection points with the City's wherever possible. Please confirm you mean the City of Windsor as the affected Eligible Community? When will the list of affected addresses be available for review with the contractor so that preparations may begin, including routing adjustments and promotion and education (P&E)?

Promotion & Education Coordination

Q. If a delay to a single stream program is not possible, will CM work with the EWSWA to ensure clear communication to residents? If the change over to cart-based programming for both recycling and Green Bins occurs at the same time, EWSWA would like to ensure residents use the correct cart and follow the proper set out instructions for each program.

A. CM's blue box program P&E efforts in Essex-Windsor will be a collaborative approach with EWSWA and the contractor, and will include information on single stream blue box material set out, new collection days and more.

Our marketing team welcomes discussions with EWSWA to ensure our strategy/plan works in tandem with EWSWA's Green Bin messaging. Please note that Circular Materials' scope is only blue box recycling, and it cannot include Green Bin messaging in its P&E.

Collection Frequency & Cart Capacity

Q. Is EWSWA's blue box collection schedule moving to a weekly collection or staying bi-weekly to support the amount of blue box that is currently being set-out at the curb in two-streams?

A. As of January 1, 2026, residents will continue to receive blue box collection on a bi-weekly schedule (i.e., 26 collections annually). This collection frequency is consistent with the cart-based collection cadence used other large urban areas such

as the City of Toronto. As with other programs, these carts are expected to meet residents' blue box containment needs between collection cycles.

Continued Use of Existing Collection Containers

Q. Some EWSWA residents have two 95-gallon, or two 65-gallon recycling carts and fill both every collection cycle. Will these households continue to be permitted to set out two containers, if two containers are required to manage the volumes set out by residents?

A. GFL will be the collection contractor in 2026. GFL will assess residential curbside existing carts being used by the resident and plan to signal to the resident if their cart is not compatible by leaving a sticker/tag indicating it will not be compatible as of January 1, 2026. GFL and our marketing team will collaborate on this initiative to ensure the messaging is clear to the resident. Further if more than one compatible cart (new 95-gallon cart delivered by GFL and compatible existing resident carts) are at the curb at a household, GFL will collect the material through their automated cart system.

Q. Where a household (resident) has placed the GFL cart at the curb in addition to a second cart (already owned and used by the resident as part of the dual stream program), will GFL collect both carts?

A. Yes, residents will be able to use their own carts if compatible per the previous question and answer.

Set out Instruction for Cardboard

Q. If there is additional cardboard bundled and placed at the curb (overage), will GFL collect the bundled cardboard along with the single stream material in the full cart at the curb, correct?

A. We are in discussions with the Contractor to ensure the best practices are established. We will have more information related to the final quarter of 2025.

Existing Inventory of Blue Boxes & Carts

Q. What is the plan for reuse/recycling of the recycling boxes/carts currently by residents that may not be compatible with the new single stream automated collection program? How will CM be accountable to ensure that these valuable resources are properly repurposed/recycled and ultimately does not go to the EWSWA Landfill.

A. CM will encourage residents to repurpose boxes for various uses such as storage.