

September 2, 2025



Dear Local Member of Provincial Parliament

Subject: Feedback on Proposed Amendments to the Resource Recovery & Circular Economy Act

On behalf of the Bluewater Recycling Association and our member municipalities, I am writing to provide feedback on the proposed amendments to the *Resource Recovery & Circular Economy Act* (RRCEA), particularly regarding maintaining collection services for small businesses and other non-eligible sources.

We recognize that with these proposed amendments, the government is seeking to address the cost pressures producers have raised, as well as some concerns small businesses have expressed towards the continuation of recycling services. While we appreciate these efforts, we feel the current proposal does not fully reflect the realities faced by municipalities, service providers, and the small businesses and residents who rely on these programs.

Our mission remains to deliver cost-effective and sustainable waste management solutions that support the public good. We remain committed to helping build a competitive, efficient, and innovative recycling system that benefits all Ontarians. To that end, we respectfully urge the government to consider the following points:

Maintaining Service for Small Businesses and Community Facilities

We strongly believe it is essential to maintain collection for small businesses and community facilities to ensure continuity of service without undue cost increases. There must be a balance between fair market procurement practices and minimizing disruption for service contracts already in place. The grandfathering of existing services—particularly in rural areas—should be considered.

Municipalities like ours have already expanded recycling service beyond traditional “main street” business areas. Excluding these customers now risks fragmenting the system, creating confusion, increasing municipal costs, and potentially sending more recyclable material to landfill. We recommend that all currently serviced, non-eligible properties remain in the system until an integrated alternative is available.

Specific Concerns with the Current Circular Material Proposal

In addition to the general issues above, I want to share candid feedback on several aspects of the draft proposal provided by Circular Materials:

- **2% ICI Limit:** The proposed cap of 2% ICI stops per route does not align with what we see in practice. Most municipalities currently serve between 3–8% ICI stops. A 2% cap appears arbitrary and would cut out the majority of existing stops. This restriction risks destabilizing service in many communities.
- **Downtown Core Apartments:** Clarification is needed on how recycling will be managed for apartments located above commercial units. Today, these residents often share a front-end bin with the business below. Under the new rules, co-collection requires a 95-gallon cart, which presents challenges:
 - These bins are located on commercial property, and if businesses are excluded, they may request removal.

- Apartments generally cannot use wheelie bins due to lack of storage and lack of space for placement on collection day.
This gap in the proposal will leave many downtown residents without a viable recycling option.
- **Quantity of Material:** Restricting ICI generators to a single 95-gallon cart is too limiting, particularly given the expanded Blue Box program starting in 2026. At a minimum, increasing the limit to two carts would provide small businesses with a reasonable solution to manage their recyclables.

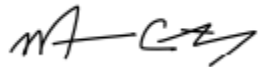
Closing Comments

While we recognize and value the work that has gone into these proposals, the framework as presented feels incomplete and impractical in several respects. The issues raised by municipalities and service providers during consultations highlight the need for a more balanced approach—one that safeguards service for small businesses, community facilities, and rural Ontarians, while ensuring the long-term success of Ontario's EPR system.

We would welcome the opportunity to meet with you to further discuss these issues and to work together on solutions that meet the needs of both producers and communities.

Thank you for your attention to this matter and for your continued support of the waste diversion and recycling goals that benefit all Ontarians.

Sincerely,



Michelle Courtney
President & CEO
Bluewater Recycling Association