

## **Association of Municipalities of Ontario Municipal 3Rs Collaborative (M3RC) – Proposed Blue Box Transition Timeline**

*Please note is the third part of a three-part submission. Items below provide a proposed timeline for transition of the Blue Box program to extended producer responsibility under the RRCEA.*

Moving to a regulation under the RRCEA provides all stakeholders with a clear timeline within which operational and financial decisions can be made. The regulation should prescribe a defined transition mechanism that would allow for a municipal self-nomination process over three years with an annual cap on the amount of material collected that can be transitioned to ensure change that is both orderly and balanced. The current thinking of municipalities on transition for the Blue Box program is below:

<b>Proposed Step</b>	<b>Proposed Timeline</b>	<b>Description</b>
1. <u>Initiate the Regulation:</u> Minister gives direction to the Resource Productivity & Recovery Authority (RPRA) and sets the completion date for transition to full producer responsibility	As soon as possible	<ul style="list-style-type: none"> <li>• Minister should send a letter to Stewardship Ontario (SO) and RPRA to start the transition of the Blue Box program</li> <li>• We are suggesting the letter be sent as soon as possible and that it include two important dates to ensure adequate time and certainty for all to plan and collaborate:               <ul style="list-style-type: none"> <li>• A date to start transitioning municipalities to the RRCEA (proposed Q4 2021);</li> <li>• A date when all municipalities would be transitioned to the RRCEA (proposed Q4 2024)</li> </ul> </li> <li>• Provides an almost 5-year window to transition all operational and financial responsibility to producers</li> </ul>
2. <u>Draft a Regulation:</u> Minister leads a province-wide consultation to develop a regulation for paper products and packaging under the RRCEA	Q2 2019 to end of Q3 2020	<ul style="list-style-type: none"> <li>• Given the range of stakeholders, the province should lead the consultation</li> <li>• Key areas of discussion should include targets for recovery and accessibility, eligible sources of material (i.e. residential), designated materials, transition timeline, transition approach</li> <li>• Changes to Regulation 101/94 would need to be considered at the same time</li> </ul>
3. <u>Regulatory Start-up Period:</u> An appropriate amount of time is provided to register producers and potentially service providers before the regulation fully comes into force	Q4 2020 – end of Q3 2021	<ul style="list-style-type: none"> <li>• After the regulation is approved, time is required for producers to establish contracts to assume operational and financial responsibility</li> <li>• Municipal self-nomination would begin to occur during this period</li> </ul>

Proposed Step	Proposed Timeline	Description
<p>4. <u>Begin Transition:</u> The municipal self-nomination process would take place over three years with an annual cap on the amount of paper products and packaging collected that can transition</p>	<p>Q4 2021 – end of Q4 2024</p>	<ul style="list-style-type: none"> <li>• The proposed transition schedule would include: <ul style="list-style-type: none"> <li>• First set of municipalities (up to 1/3 by tonnage of Blue Box materials) would transition between Q4 2021 and Q4 2022</li> <li>• Second set of municipalities (up to 2/3 by tonnage of Blue Box materials) would transition between Q4 2022 and Q4 2023</li> <li>• Third set of municipalities (total tonnage of Blue Box materials) would transition between Q4 2023 and Q4 2024</li> </ul> </li> <li>• Municipalities that have transitioned would have O. Reg 101/94 requirements removed (as producers would not have these requirements under the RRCEA)</li> <li>• Producers would be required to meet targets linked to transitioned municipalities</li> <li>• For those municipalities not transitioned, the Blue Box Program Plan would continue with 50% funding being provided by Stewardship Ontario until transition is complete</li> </ul>
<p>5. <u>Transition Completed:</u> At a defined date outlined in the Minister’s letter, all municipalities must transition their Blue Box programs to producers.</p>	<p>End of Q4 2024</p>	<ul style="list-style-type: none"> <li>• The paper products and packaging regulation under the RRCEA would be in place with province-wide targets and servicing in place</li> <li>• The <i>Waste Diversion Transition Act</i> would cease and all municipalities would be relieved of all Blue Box related requirements under Reg. 101/94</li> </ul>

We think that this transition schedule would allow for the wind-up of the old *Waste Diversion Act* and brings the full benefits of the RRCEA into effect for all designated wastes. With full financial and operational control, producers are best positioned to enable a consistent province-wide system that makes recycling easier and more accessible. To date, promotion and education has been up to individual municipalities who each take different items based on their own infrastructure and residents. A harmonized list of acceptable materials for the program across the Province would enable promotion efforts to be done with more scale and ensure residents know what materials can be included. Municipal governments think this process is reasonable because the main elements of the regulation have already been discussed in some detail as part of the proposed amended Blue Box Program Amendment. This includes what paper products and packaging are designated across the province, accessibility, environmental outcomes and targets. There is a growing understanding between the various stakeholders of the issues each has and of practical solutions to address to ensure a smooth transition of the Blue Box which will lead to better outcomes for all. We are confident that any remaining issues can be addressed through the consultation.