

**Pilon, Janet**

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**Subject:** Proposed Transition schedule for your Blue Box program to the new Full Producer Responsibility regulation

**From:** AMO President <[amopresident@amo.on.ca](mailto:amopresident@amo.on.ca)>

**Sent:** October 26, 2020 4:31 PM

**Subject:** Proposed Transition schedule for your Blue Box program to the new Full Producer Responsibility regulation

Dear Mayor/Head of Council,

**Re: Proposed Transition schedule for your Blue Box program to the new Full Producer Responsibility regulation**

I wanted to follow up with you regarding the proposed transition schedule for your Blue Box program to the new full producer responsibility regulation.

Minister Yurek [announced](#) the posting of the draft Blue Box resolution under the RRCEA. It will be [on the EBR for 45 days](#), and comments are due December 3, 2020. The draft regulation contains a proposed transition schedule for municipal blue box programs.

The announcement made the following clear:

- Communities that have a program today, regardless of size, will receive mandatory servicing by producers in the future,
- The program will be required to expand to all communities (with the exception of the far north) along with schools, long term care and retirement homes, parks and public spaces by 2026,
- Input from municipal governments about when they desired to transition was accommodated as much as possible, but not in all cases.

We are pleased the Minister responded to many of the concerns brought forward by municipal governments. He and this government should be commended for moving this important initiative forward. It will be helpful to continue to encourage that this regulation be approved in a manner that aligns with what municipal governments have advocated for many years – better environmental and economic outcomes.

Thanks to all of you for your work on this file and to the many of you who provided a resolution regarding your preferred date for transition. We have included an analysis of the preferred dates municipal Councils identified versus what is proposed in the draft regulation (Attached).

AMO worked diligently to ensure the Ministry had both a copy of all municipal resolutions passed related to the Blue Box transition, as well as, providing them with a full summary of resolutions.

We also met with the Ministry on multiple occasions to ensure they understood the list we had provided and why it was reasonable based on the recommendations in [David Lindsay's Mediation Report](#).

When the list of municipal government resolutions was prorated based on when in the year municipal governments wanted to transition (see Table below), the Ministry had a list that resulted in roughly one-third of the program transition per year. This was the stated objective from producers and industry to disperse the full cost over a three-year period.

	<b>Total Households Served</b>	<b>Total Population</b>	<b>Collected</b>	<b>Marketed</b>	<b>Net Cost</b>	<b>Total Residential Waste Generated</b>
<b>2023 - resolutions</b>	40.45%	38.00%	38.12%	37.78%	38.32%	38.91%
<b>2024 - resolutions</b>	29.14%	29.50%	28.73%	28.18%	27.94%	28.83%
<b>2025 - resolutions</b>	25.21%	28.45%	29.10%	29.35%	26.97%	29.69%
<b>Total - resolutions</b>	94.81%	95.96%	95.95%	95.31%	93.23%	97.43%

As we always reiterated in our correspondence with you, the final decision on the transition schedule rests with the provincial government. They have indicated that they used your preferred dates but also included geographical catchments, tonnes and costs to set the schedule.

We understand changes to transition dates could be problematic for some, especially based on contractual relationships or other issues. We would encourage you to ensure the Ministry is directly aware of your concerns and would appreciate it if you could copy us on your correspondence.

If you have any questions or require further details please contact Dave Gordon at 416 389 4160 or [dgordon@amo.on.ca](mailto:dgordon@amo.on.ca).

Sincerely,

Graydon Smith  
 AMO President  
 Mayor of the Town of Bracebridge

## Analysis: Blue Box Transition Schedule Comparison with Preferred Municipal Transition Dates

The Ministry of the Environment, Conservation and Parks has proposed a producer responsibility regulation for the Blue Box Program.

The draft regulation is currently posted for a 45-day consultation period on the province's Environmental and Regulatory Registries (<https://ero.ontario.ca/notice/019-2579>).

The Association of Municipalities of Ontario sent the preferred transition dates as chosen by Council to the Ministry, between January and October 2020.

The Ministry is consulting on the proposed transition groupings and with First Nations as it works to finalize the regulation and identify calendar dates for each transitioning program within a given year.

If the date provided by the Ministry in the draft Regulation is problematic for your community, we encourage you to provide this information to the Ministry at [ministry.mecp@ontario.ca](mailto:ministry.mecp@ontario.ca).

Eligible Community	Ministry's Proposed Transition Year in the Regulation	Year that Council Preferred to Transition
Addington Highlands, Township of	2025	2023
Admaston/Bromley, Township of	2025	N/A
Alfred and Plantagenet, Township of	2023	N/A
Algonquin Highlands, Township of	2024	2023
Armour, Township of	2025	2023
Armstrong, Township of	2025	N/A
Arnprior, Town of	2023	2023
Ashfield-Colborne-Wawanosh, Township of	2025	N/A
Assiginack, Township of	2025	N/A
Athens, Township of	2025	N/A
Atikokan, Township of	2025	N/A
Augusta, Township of	2025	2024
Aylmer, Town of	2023	2023
Baldwin, Township of	2025	N/A
Bancroft, Town of	2025	N/A
Barrie, City of	2024	2024
Bayham, Municipality of	2023	2023
Beckwith, Township of	2023	2023
Billings, Township of	2025	2023
Blind River, Town of	2025	2024
Bluewater Recycling Association	2024	2024
Bonfield, Township of	2025	N/A

<b>Eligible Community</b>	<b>Ministry's Proposed Transition Year in the Regulation</b>	<b>Year that Council Preferred to Transition</b>
Bonnechere Valley, Township of	2025	2023
Brant, County of	2025	2024
Brantford, City of	2025	2024
Brockville, City of	2025	2023
Bruce Area Solid Waste Recycling	2025	2025
Brudenell, Lyndoch and Raglan, Township of	2025	2025
Burk's Falls, Village of	2025	2023
Callander, Municipality of	2025	2023
Calvin, Municipality of	2025	N/A
Carleton Place, Town of	2023	2023
Carling, Township of	2025	2023
Carlow Mayo, Township of	2025	2023
Casey, Township of	2025	N/A
Casselton, Village of	2023	2023
Central Elgin, Municipality of	2023	2023
Central Frontenac, Township of	2025	2023
Central Manitoulin, Township of	2025	2025
Charlton and Dack, Municipality of	2025	N/A
Chatham-Kent, Municipality of	2024	2023
Chatsworth, Township of	2023	N/A
Chisholm, Township of	2025	N/A
Clarence-Rockland, City of	2023	2023
Cobalt, Town of	2025	N/A
Cochrane, Corporation of the Town of	2025	2023
Coleman, Township of	2025	N/A
Conmee, Township of	2024	N/A
Cornwall, City of	2025	2024
Deep River, Town of	2025	2023
Deseronto, Town of	2025	2023
Drummond-North Elmsley, Township of	2023	2023
Dryden, City of	2023	2023
Dufferin, County of	2023	2023
Durham, Regional Municipality of	2024	2023
Dutton-Dunwich, Municipality of	2023	2023
Dysart et al, Township of	2024	2023
East Ferris, Municipality of	2025	N/A
Edwardsburgh Cardinal, Township of	2025	2023
Elizabethtown-Kitley, Township of	2025	2023
Elliot Lake, City of	2025	2025
Emo, Township of	2025	N/A
Englehart, Town of	2025	2025
Enniskillen, Township of	2023	2023

<b>Eligible Community</b>	<b>Ministry's Proposed Transition Year in the Regulation</b>	<b>Year that Council Preferred to Transition</b>
Espanola, Town of	2025	N/A
Essex-Windsor Solid Waste Authority	2024	2024
Evanturel, Township of	2025	2024
Faraday, Township of	2025	2024
Fort Frances, Town of	2025	2024
French River, Municipality of	2025	N/A
Front of Yonge, Township of	2025	2023
Frontenac Islands, Township of	2025	N/A
Gananoque, Town of	2025	2023
Gauthier, Township of	2025	N/A
Georgian Bluffs, Township of	2023	N/A
Gillies, Township of	2024	N/A
Goulais Local Service Board	2023	N/A
Greater Madawaska, Township of	2025	N/A
Greater Napanee, Township of	2025	2023
Greater Sudbury, City of	2025	N/A
Grey Highlands, Municipality of	2023	N/A
Guelph, City of	2025	2023
Haldimand, County of	2024	2023
Halton, Regional Municipality of	2025	2025
Hamilton, City of	2025	2023
Hanover, Town of	2025	2024
Harley, Township of	2025	N/A
Hastings Highlands, Municipality of	2024	2023
Hawkesbury Joint Recycling	2023	2023
Head, Clara and Maria, Townships of	2025	2023
Hearst	2025	2023
Highlands East, Municipality of	2024	2023
Hilliard, Township of	2025	2025
Hilton Beach, Village of	2025	N/A
Horton, Township of	2025	2023
Howick, Township of	2024	2023
Hudson, Township of	2025	N/A
Huron Shores, Municipality of	2025	2023
James, Township of	2025	N/A
Kapusking, Town of	2025	2023
Kawartha Lakes, City of	2024	2023
Kearney, Town of	2025	N/A
Kenora, City of	2023	2023
Kerns, Township of	2025	N/A
Killaloe, Hagarty, and Richards, Township of	2025	N/A
Killarney, Municipality of	2025	2025

<b>Eligible Community</b>	<b>Ministry's Proposed Transition Year in the Regulation</b>	<b>Year that Council Preferred to Transition</b>
Kingston, City of	2025	N/A
Kirkland Lake, Town of	2025	2023
Laird, Township of	2025	N/A
Lanark Highlands, Township of	2025	N/A
Larder Lake, Township of	2025	N/A
Latchford, Town of	2025	N/A
Laurentian Hills, Town of	2025	2024
Leeds and the Thousand Islands, Township of	2025	N/A
Limerick, Township of	2025	N/A
London, City of	2023	2023
Loyalist, Township of	2025	2023
Macdonald, Meredith & Aberdeen Additional, Township of	2025	N/A
Machar, Township of	2025	N/A
Madawaska Valley, Township of	2025	2025
Magnetawan, Municipality of	2025	2023
Malahide, Township of	2023	2023
Marathon, Town of	2025	N/A
Matachewan, The Corporation of the Township of	2025	N/A
Mattice-Val Cote, Municipality of	2025	2023
McDougall, Municipality of	2025	N/A
McGarry, Township of	2025	N/A
McKellar, Township of	2025	N/A
McMurrich/Monteith, Township of	2025	N/A
Mcnab-Braeside, Township of	2023	2023
Meaford, Municipality of	2023	2023
Merrickville-Wolford, Village of	2023	N/A
Minden Hills, Township of	2024	N/A
Mississippi Mills, Town of	2023	2023
Montague, Township of	2023	2023
Muskoka, District Municipality of	2024	2023
Nairn & Hyman, Township of	2025	2023
Neebing, Municipality of	2024	2023
Newbury, Village of	2023	N/A
Niagara, Regional Municipality of	2024	2023
Nipissing, Township of	2025	N/A
Norfolk, County of	2024	2024
North Bay, City of	2025	2023
North Dundas, Township of	2025	2024
North Frontenac, Township of	2025	N/A
North Glengarry, Township of	2025	2024

<b>Eligible Community</b>	<b>Ministry's Proposed Transition Year in the Regulation</b>	<b>Year that Council Preferred to Transition</b>
North Grenville, Municipality of	2023	N/A
North Huron, Township of	2025	N/A
North Stormont, Township of	2025	2025
Northeastern Manitoulin & Islands, Town of	2025	N/A
Northern Bruce Peninsula, Municipality of	2025	2025
Northumberland, County of	2024	2023
O'Connor, Township of	2024	2023
Oliver Paipoonge, Municipality of	2024	N/A
Orillia, City of	2024	2024
Ottawa Valley Waste Recovery Centre	2025	2025
Ottawa, City of	2023	2023
Owen Sound, City of	2023	2023
Oxford, Restructured County of	2025	2025
Papineau-Cameron, Township of	2025	2024
Parry Sound, Town of	2025	2023
Peel, Regional Municipality of	2024	2024
Perry, Township of	2025	2023
Perth, Town of	2025	2025
Peterborough, City of	2024	2023
Peterborough, County of	2024	2023
Petrolia, Town of	2023	N/A
Plympton-Wyoming, Town of	2023	2023
Powassan, Municipality of	2025	2024
Prescott, Town of	2025	2023
Prince, Township of	2023	2023
Quinte Waste Solutions	2025	2025
Rainy River, Town of	2025	N/A
Red Lake, Municipality of	2023	2023
Renfrew, Town of	2025	2023
Rideau Lakes, Township of	2025	2024
Russell, Township of	2025	2023
Sables-Spanish Rivers, Township of	2025	2023
Sarnia, City of	2023	2023
Sault Ste. Marie, City of	2023	2023
Seguin, Township of	2025	2023
Shuniah, Municipality of	2024	N/A
Simcoe, County of	2024	2023
Sioux Lookout, The Corporation of the Municipality of	2025	2023
Sioux Narrows Nestor Falls, Township of	2023	2023
Smiths Falls, Town of	2025	2023
South Dundas, Township of	2025	2024

<b>Eligible Community</b>	<b>Ministry's Proposed Transition Year in the Regulation</b>	<b>Year that Council Preferred to Transition</b>
South Frontenac, Township of	2025	N/A
South Glengarry, Township of	2025	N/A
South Stormont, Township of	2025	2024
Southgate, Township of	2023	2023
Southwest Middlesex, Municipality of	2023	2023
Southwold, Township of	2023	2023
Spanish, Town of	2025	2023
St. Charles, Municipality of	2025	2025
St. Clair, Township of	2023	2023
St. Joseph, Township of	2025	N/A
St. Thomas, City of	2023	2023
Stone Mills, Township of	2025	N/A
Stratford, City of	2024	2023
Strong, Township of	2025	2023
Sundridge, Village of	2025	2023
Tarbutt & Tarbutt Additional, Township of	2025	2023
Tay Valley, Township of	2025	2024
Temiskaming Shores, City of	2025	2025
Terrace Bay, Township of	2025	N/A
Thames Centre, Municipality of	2023	2023
The Archipelago, Township of	2025	N/A
The Blue Mountains, Town of	2023	N/A
The Nation, Municipality	2023	2023
Thunder Bay, City of	2024	2023
Timmins, City of	2025	2023
Toronto, City of	2023	2023
Tri-Neighbours	2025	2025
Tudor & Cashel, Township of	2025	2024
Waterloo, Regional Municipality of	2024	2024
Wellington, County of	2025	2023
West Elgin, Municipality of	2023	2023
West Grey, Municipality of	2025	2023
West Nipissing, Municipality of	2025	N/A
Westport, Village of	2025	2023
Whitestone, Municipality of	2025	N/A
Whitewater Region, Township of	2025	N/A
Wollaston, Township of	2025	N/A
York, Regional Municipality of	2025	2025