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Sent: Tuesday, February 3, 2026 10:10 AM

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Subject: Commercial Recycling Crisis - Small Business Cannot Absorb Provincial Failure

External Email: Use caution with links and attachments.

To: Hamilton City Council, Provincial Representatives, Circular Materials Ontario, Local BIAs, Media

I own JT Pets at 605 Concession St in Hamilton. I'm writing because the province's recycling transition has created an absurd situation that will result in illegal dumping, environmental harm, and small business closures.

The problem is simple: The province transferred recycling responsibility to producers but excluded commercial properties. Now Hamilton's interim pilot is ending in March, and I'm expected to figure it out myself.

Here's my reality:

I'm in a mixed-use building with no alleyway and no storage space. There is nowhere to put a bin. There is no way for a private truck to service my location. I already struggle to get cardboard boxes picked up under the current system.

My street is already serviced by multiple garbage routes - residential pickup, commercial pickup, city waste. The "solution" being proposed is private pickup. According to testimony at Hamilton's January 2026 budget meeting, the cost of a private bin is approximately \$500/month for businesses that have alley access (source: <https://www.youtube.com/watch?v=wwQMLnBmc9c> at approximately 2:55:35). I don't have alley access. I don't have storage space. There is no practical private solution for my location - yet I'm expected to pay \$6,000/year or more for a service that can't actually be delivered.

This is not environmental policy. This is idiocy.

To Minister McCarthy and Circular Materials:

On December 17, 2025, Minister McCarthy announced that Ontario's new EPR system is "protecting Ontario with a stronger and more sustainable program that will help reduce waste and increase diversion, while reducing costs for municipalities."

On the same day, Circular Materials CEO Allen Langdon declared the program would help "leave the province and planet better than when we found it" and create "a sustainable legacy that benefits generations to come."

The press release states recycling is now "100% funded by producers" and that "municipalities and taxpayers will no longer pay for recycling services." It claims Ontario municipalities are "collectively saving over \$200 million in costs" and can now "redirect their budgets to other local initiatives."

None of this is true for small businesses.

You didn't eliminate recycling costs. You transferred them from municipalities onto small business owners who can't afford them. You unified the material list for households while leaving commercial properties with no solution. You added coffee cups, toothpaste tubes, and black plastic containers for residents while telling me to figure it out myself.

My cardboard boxes come from the same producers paying into your system. The packaging I break down every week is identical to what residents put at their curb. Yet somehow I'm excluded from the program those producers fund.

This isn't a sustainable legacy. This is cost-shifting disguised as environmental policy.

The consequences of inaction:

I cannot absorb \$6,000 in new annual costs. My business is already squeezed by tariffs, rising supplier costs, and inflation. Hamilton's transfer stations won't even accept commercial recycling - so my only real option is putting cardboard in the garbage.

That's where this policy leads: more waste in landfills, more illegal dumping, and more small businesses closing. This outcome is the opposite of what EPR was designed to achieve.

What I'm asking:

1. **Hamilton Council:** Extend the commercial recycling pilot through 2026 and support Councillor Crutch's motion. Continue advocating to the province for a permanent solution.
2. **Premier Ford and Minister McCarthy:** Fix this. Expand producer responsibility to include commercial properties or fund municipalities to continue service. You downloaded this problem onto small businesses - own it.
3. **MPP Ciriello:** You were Hamilton's Director of Municipal Law and Licensing before your election. You know how bylaw and waste services work in this city. Advocate for your constituents who run small businesses and have no viable path forward under this policy.
4. **Circular Materials Ontario:** You were created to solve recycling in this province. Small businesses generate recyclables from the same producers funding your system. Include us or explain publicly why commercial waste doesn't count toward your "sustainable legacy."

Hamilton's commercial recycling pilot costs 0.13% of the city's tax-supported operating budget. The city saved approximately \$10 million when residential recycling transferred to producers. This is solvable. What's missing is political will at the provincial level and accountability from Circular Materials.

Tell me how this makes sense.