

BLUE BOX BLUES

ONTARIO REGULATION 391/21

THE PROBLEM

Ontario Regulation 391/21 leaves municipalities with two unappealing options that will either increase costs, inefficiencies and emissions or reduce services and diversion rates, shortening the lifespan of existing landfills.

The regulation removes from producers the responsibility to collect from a wide range of non-eligible sources including: commercial farms, daycares, not-for-profits, industrial/commercial properties, municipal buildings, places of worship, campgrounds and trailer parks.



THIS LEAVES MUNICIPALITIES, PARTICULARLY RURAL ONES, WITH TWO **BAD OPTIONS:**

OPTION 1: SEPARATE COLLECTION PROGRAM

- Additional trucks will have to collect at different times on the same routes, increasing costs, inefficiencies and greenhouse gas emissions
- The shifting cost burden for what was a general service will negatively impact the IC&I sector and create administrative red tape
- The lack of competition in the sector will lead to higher contract prices

OPTION 2: CEASE COLLECTION OPERATIONS FOR NON-ELIGIBLE SOURCES

- Disproportionately impact small businesses and non-profits already struggling with inflation and interest rate hikes
- Recyclable material will instead go to landfills, drastically shortening their lifespan
- This diversion reduction comes with environmental impacts and long-term cost implications

THE SOLUTION

Expand producer responsibility to include IC&I properties and promote continued participation in recycling programs.

