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Submission to the Ontario Ministry of Environment, Conservation and Parks in response to the public consultation on "A proposed regulation, and proposed regulatory amendments, to make producers responsible for operating blue box programs"

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We are a major global supplier of equipment and materials for efficient and sustainable packaging of food products, based in Sweden. In this capacity we have developed a packaging product, known as Boardio, which replaces the stand-up plastic pouch and composite can for dry granulated and powdered food products and which is much more readily recyclable than either of those package formats. In addition Boardio packaging has a substantially lighter environmental footprint than most packaging types which it aims to replace, contributes substantially fewer greenhouse gas emissions, and has barrier properties which protect dry granulated and powdered food products as effectively as the virtually non-recyclable plastic and composite packages currently in use. Boardio is comprised of 85% forest fibre and its assured recyclability in existing fibre recycling mills is being demonstrated through trials currently under way in North America.

We are currently installing two Boardio packaging machines at a plant in the Greater Toronto Area and the launch of products from this plant is projected for Summer 2021. This will be the North American launch of Boardio packaging. Products from this Toronto plant will be distributed under major brand names across North America. Rollout of full production from this plant is projected to take place at the end of the third quarter of 2021.

Clearly recyclability is one of the major attributes and benefits of Boardio packaging. At a time when consumers, industry and governments are looking for ways to reduce or eliminate single use plastics, Boardio offers a paper-based alternative with comparable technical properties in combination with a reduction in environmental impacts and the added benefit of being recyclable in the paper stream, with all of the inherent benefits. Along with the major food and retail industry associations we support your proposed regulation to make producers responsible for operating the Blue Box Program. However one aspect causes us some uncertainty. Sections 40(2) and 40(3)7 address producers of blue box material who may be entering the Ontario market after April 1, 2021. One or more of our customers for Boardio packaging may be in that position, albeit the Boardio package will be replacing non-recyclable packages already marketed and in full distribution in the marketplace in Ontario and nationally. It is not clear to us from your proposed regulation whether there is any risk that implementation of the Blue box transition plan will lead to a period of time in 2021 and perhaps 2022 during which materials not in the Blue box before April 1, 2021, may not be able to gain access to this important recycling system, especially if the producer was not a supplier of blue box material to consumers in Ontario on or before April 1, 2021. We recognize that this April 1, 2021 date may shift but our concern does not change if the date shifts to any other in 2021 or 2022.

We understand that it is not your intention that the blue box transition should make it difficult for new and environmentally improved materials to access the blue box during the transition period but we are concerned that this may be the result of the proposed regulation as currently written, either because municipalities or producer responsibility organizations feel free to postpone acceptance of new packaging types or because, with a delayed reporting system for packaging not in the blue box before April 1, 2021, the blue box system sees no priority in accommodating such packages.

We are therefore requesting that the Ministry make it abundantly clear that any new packaging that is introduced after April 1st 2021, or whatever other date may be chosen for section 40(2), and that is appropriate for inclusion in the blue box, should be incorporated into the blue box system as quickly as possible and certainly with no more delay than would be experienced if the transition were not taking place.

We would very much welcome the opportunity to meet virtually with a member of the MECP team developing the final regulation to introduce you to the Boardio package and its environmental and recycling attributes, to further explain our concern, and to discuss approaches as to how our concern might be addressed.

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