



Resource Recovery Policy Branch  
40 St. Clair Avenue West, 8th floor  
Toronto, ON M4V 1M2

Letter submitted through the Environmental Registry of Ontario

December 3, 2020

**Re: A proposed regulation, and proposed regulatory amendments, to make producers responsible for operating blue box programs**

To Whom it May Concern:

Thank you for providing the opportunity to comment on the proposed regulations pertaining to the Blue Box Program in Ontario under the *Resource Recovery and Circular Economy Act, 2016*. The Canadian Animal Health Institute (CAHI) represents the manufacturers and distributors of veterinary medicines and health products in Canada. We are responding to the Ontario Ministry of the Environment, Conservation and Parks (MECP) consultation on the proposed regulations on behalf of our members, many of whom are registered stewards in Ontario and other provinces, for paper and printed packaging products.

A number of our members are also affiliated with the [Canadian Stewardship Services Alliance \(CSSA\)](#) and we are generally supportive of the proposed wind-up plan submitted by Stewardship Ontario (SO). Given the intention of the Province of Ontario to move to full producer responsibility by 2026, it is important to note this includes support for SO's proposal for the Material Cost Differentiation (MCD) Methodology developed with the CSSA. Because our members are producers in multiple provinces, CAHI is supportive of regulatory and policy initiatives that promote harmonization in stewardship programming. Further, it is essential that the costing model used better reflects material characteristics and trends in recycling technology and packaging design be considered. We continue to support efforts by MECP, along with RPRA, to explore what other Canadian jurisdictions are doing to promote greater efficiency in Blue Box Program delivery and to encourage greater recycling opportunities for the materials they administer.

The proposed transition schedule provided was appreciated and will help our members adequately forecast the cost impact of increased producer responsibility in Ontario. We continue to support efforts to spread the impact of the proposed regulations over a transition period and to ensure it is as evenly distributed as possible given the population base in some municipalities (e.g. Southern Ontario and the GTA). Overall, we do not anticipate that the proposed expansion of the program to include more facilities will result in significant increases in the volume of product collected from our sector. Similarly, we do not have any

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comments on the *de minimis* thresholds proposed, although we do anticipate some of our members will fall into this category of producer.

Along that line, we were pleased that packaging with residual medicinal or health products are excluded from the proposal for the Ontario Blue Box program. CAHI's members are pleased to collaborate with the [Health Products Stewardship Association \(HPSA\)](#) to manage the disposal obsolete and unwanted veterinary medications from households as is already required by Ontario regulation. Similarly, we voluntarily partner with [Cleanfarms](#) to offer collections to for old livestock and equine collections across Canada on a rotating, three year basis.

We have no specific comments in relation to the proposed definitions for what "blue box packaging" means; however, we have noted there are some inconsistencies communicated in the policy direction from Ontario compared to those that have since been communicated by Environment and Climate Change Canada (ECCC) around the management of plastic products. We expect these will be addressed in the next phase of this consultation. Additionally, should this policy initiative be expanded further to include agricultural waste and recyclables, CAHI strongly encourages the MECP to consult directly with Cleanfarms and the farming sector (including grower groups, farmers, and businesses that supply farmers), as well as agricultural-intensive municipalities, about agriculture-related recycling programming. Our members are aware of, and supportive of, other voluntary recycling programs offered by Cleanfarms, in Ontario, in this area.

The CAHI and its members appreciate efforts to modernize Ontario's Blue Box Program and we look forward to the outcome of this consultation. As committed environmental stewards, our membership looks forward to working with the MECP and the RPRA as we move forward on environmental regulatory and policy initiatives in Ontario.

Sincerely,

A handwritten signature in blue ink, reading "Colleen McElwain".

Colleen McElwain  
Programs Director