



Bryan Robinson, Director of Public Works

**City of Kawartha Lakes
Public Works Department**
322 Kent Street West
PO Box 9000, 26 Francis Street,
Lindsay, Ontario
K9V 5R8
Tel: (705) 324-9411 ext. 1143
brobinson@kawarthalakes.ca
Toll Free: 1-888-822-2225
www.kawarthalakes.ca

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Jamelia Alleyne
Resource Recovery Policy Branch
Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West
8th floor
Toronto, ON
M4V 1M2
Canada

Dear Jamelia Alleyne,

The purpose of this letter is to provide comments from the City of Kawartha Lake on the draft blue box regulation posted on the Environmental Registry of Ontario. We wish to acknowledge and thank the Province for carrying through on this process during these unprecedented times.

The proposed amendments come at a much-needed time for municipalities as costs for recycling continue to increase each year. We acknowledge the many positive aspects of the draft regulation including the standardized and expanded list of designated recyclable items, the enforceable diversion targets set and the removal of financial burden on municipalities.

In review of the draft regulation, the City of Kawartha Lakes is concerned that we did not receive the transition date of 2023, which was requested by our Council. The draft regulation assigns a transition date of 2024 to the City of Kawartha Lakes. This delay in transition comes with a significant financial burden for our municipality of approximately \$2.5 million dollars (operation costs during 2023). Other municipalities who have received an earlier transition date will avoid these operation costs completely.

Has the province considered that Municipal self-determinacy should be the driving criteria used to establish the transition schedule? How will the Province recognize the cost impacts of the varied transition dates and provide Municipalities equitable fiscal benefit within the legislative changes?

Below are some other comments for consideration on the draft regulation:

- Compostable materials should not be exempt from collection and management requirements. These materials are difficult to manage for municipalities and are likely to increase in the marketplace due to the federal single use plastic ban. Producers should be responsible for diversion of these materials and targets should be set.

- The Industrial, Commercial and Institutional (IC&I) sector and Business Improvement Areas (BIA) should also be included in the regulation, not just residential sources. The IC&I sector makes up the vast majority of waste and recycling in the province, and real progress on waste diversion will not be made until waste and recycling from this sector is dealt with appropriately.
- Producers should be required to provide depot collection in areas in which recycling is collected curbside. By providing depot locations for residents this allows a place for excess recycling, or recycling that was missed curbside to be dropped off reducing litter and illegal dumping.
- Producers should be required to perform annual performance audits rather than once every three (3) years. This will reduce risks and promote continuous improvement.
- Diversion rate targets should be based on the percentage of products, which are actually recycled, not simply marketed. This will provide more accountability for producers and contribute to the circular economy more effectively.

In conclusion, the City of Kawartha Lakes is supportive of many aspects of the draft regulation and hopes that our comments particularly surrounding the transition schedule are seriously considered. Thank you for the opportunity to comment on the proposed regulation.

Sincerely,



Bryan Robinson, P. Eng.
Director of Public Works
City of Kawartha Lakes
Phone: 705-324-9411 x1143