

December 16, 2021

John Fox  
Ministry of Environment, Conservation, and Parks  
Resource Recovery Policy Branch  
40 St. Clair Avenue West, 8th floor  
Toronto, ON  
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Sent via email to: [john.fox@ontario.ca](mailto:john.fox@ontario.ca)  
and submitted online via the Environmental Registry of Ontario (ERO)

Dear John Fox,

**Re: ERO # 019-4656 - Proposed amendments to the producer responsibility regulations**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than two hundred farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

We are pleased to provide comments from an agricultural and rural Ontario perspective on the proposed amendments to the Tires, Batteries, and the Electrical and Electronic Equipment (EEE) producer responsibility regulations (PRRs), aimed to reduce regulatory burden and ensure regulatory alignment with other PRRs. By streamlining audit, reporting, and educational requirements, more aligned with the Blue Box regulation, transitioning to an individual producer responsibility model, participants and the public will be better able to understand their accountabilities.

We also support the proposed EEE regulatory changes to increase management targets and on-demand collection provisions, and amendments to expand the requirement for tire producers to provide on-demand collection services to municipalities with populations of less than 1,000, territorial districts and First Nation communities. Rural communities have limited recycling and waste management options.

As noted in our submission on ERO # 019-0045 (Administrative Penalties Regulation made under the Resource Recovery and Circular Economy Act), the transition to of the Blue Box Regulation to Individual Producer Responsibility (and alignment of the five producer responsibility regulations) are challenging for legislators, stakeholders and the public. We look forward to continued discussions with the Ministry and RPRA as regulations and legislation develop.

Sincerely,



Peggy Brekveld  
President

cc: Hon. David Piccini, Ontario Minister of the Environment, Conservation, and Parks  
OFA Board of Directors