

July 4, 2025

Marc Peverini
Resource Recovery Policy Branch
Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West, 8th Floor
Toronto, ON M4V 1M2

Submitted via the Environmental Registry of Ontario and to Marc.Peverini@ontario.ca

Dear Marc Peverini,

Re: ERO 025-0009 Amendments to the Blue Box Regulation

The Ontario Federation of Agriculture is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses. On behalf of OFA, thank you for the opportunity to participate in the consultation process for ERO 025-0009 Amendments to the Blue Box Regulation.

The transition to the individual waste producer responsibility framework has significant challenges for all stakeholders, and we share the ministry's concern that the viability of Ontario's blue box program is at risk. We support the proposed actions to ensure residential collection costs remain manageable and to stabilize residential recycling services. From an agricultural perspective, our concerns relate to farms as blue box customers and as blue box material producers.

Blue Box Customers

OFA represents over 38,000 farm businesses and farm families, and in most cases, their business location is also their homestead. As indicated in the concurrent proposal 025-0536; Amendments to the *Resource Recovery and Circular Economy Act*, 2016, the ministry has heard that some small businesses may lose recycling service as the transition to the blue box is completed in 2026. OFA has heard similar concerns from several of our farm business members; that municipalities and waste collection companies are taking steps to remove them from recycling and waste collection routes, even for the residential properties on their farmland.

Blue Box Material Producers

OFA has also heard concerns from several agricultural subsectors with producer responsibilities that the reporting and collection requirements for brand owner packaging is onerous. We have also heard from several farm businesses which exceed de minimis revenue thresholds (Ontario generated revenue threshold to exempt businesses from regulatory requirements), that the

threshold applies to their entire Ontario revenue, yet their revenue related to products that require packaging material are far below the threshold.

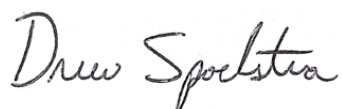
As outlined in previous OFA letters to the ministry related to the *Waste-Free Ontario Act* and Ontario's transition to the packaging material producer responsibility model, we remain concerned about farm businesses being responsible for food packaging waste. Increasingly, farmers, particularly those in the horticultural sector, are required to package farm products on the farm for distribution through retail. Farmers do not have and cannot gain any control of the packaging materials that are dictated by the retail buyer. In these types of situations, either the manufacturer of the packaging and/or the retailer should be deemed as the "producer" and therefore accountable for its waste and recovery management.

In this regard, OFA continues to recommend that the retailer should be the party responsible for the reporting and end of life management of such non-processed or minimally processes farm product packaging, regardless of any branding on the packaging material.

This is also in keeping with the concept of responsible sourcing that many retailers embrace. Given that retailers are the link between consumers and the manufacturers of products, it is more efficient and effective to require retailers to ensure that the products they market fit the requirements for reuse, recycling and recovery. In addition, from an efficiency perspective, there are far fewer retailers than there are manufacturers, which would reduce administrative costs significantly.

OFA appreciates the opportunity to provide our feedback and perspectives as Ontario continues the transition to the producer responsibility framework. We look forward to working with the ministry to find policy solutions that support the agri-food sector.

Sincerely,



Drew Spoelstra
President

cc: The Hon. Todd J. McCarthy, Minister of the Environment, Conservation and Parks
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.