

July 21, 2025

Marc Peverini
Resource Recovery Policy Branch
Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West, 8th Floor
Toronto, ON
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Submitted via the Environmental Registry of Ontario and to Marc.Peverini@ontario.ca

Dear Marc Peverini,

Re: ERO 025-0536 Amendments to *Resource Recovery and Circular Economy Act*

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 provide comments on ERO 025-0536 Amendments to the *Resource Recovery and Circular Economy Act* (RRCEA).

There is a high level of interest in the Blue Box program transition to the producer responsibility model. The transition 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. From an agricultural perspective, our concerns relate to farms as blue box customers and as blue box material producers.

Blue Box Customers

We represent over 38,000 farm businesses and farm families, and in most cases, their business location is also their homestead. OFA has heard similar concerns as the ministry from several of our farm business members; that municipalities and waste collection companies are removing them from collection routes, including residential properties on their farmland.

Blue box requirements were initially structured to ensure continued collection services to eligible sources while also providing producers with flexibility on how they establish their collection systems. Small businesses, multi-unit residential buildings, institutions, and public spaces should be eligible collection sources. These location owners have municipal tax obligations that help finance recycling and waste collection. As with all other consumers, they will pay higher prices for products, to offset costs borne by individual packaging producers responsible under RRCEA. It is inconsequential where primary, convenience or transportation packaging enters the waste management stream, these materials remain the responsibility of persons identified in RRCEA as responsible to manage collection, promotion and education, reporting, auditing and record keeping.

OFA agrees that is inefficient for municipalities to arrange separate collection for these sources, while Producer Responsibility Organizations (PROs) manage residential collection. We support enabling legislation to require PROs to offer to service small businesses and institutions yet to be included in the expanded Blue Box Regulation. In addition, PROs must exert the effort to service residential homes on farms.

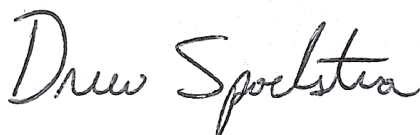
Blue Box Material Producers

Whether farm products are marketed through retail or wholesale channels, farmers are required to package products on the farm for distribution. 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 reporting and end of life management of non-processed or minimally processes agri-food packaging, regardless of any branding on the packaging material.

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>.