

Niagara Region Comments on Blue Box Program Transition and Stewardship Ontario Windup Plan

Niagara Region appreciates the opportunity to provide the Resource Recovery and Productivity Authority (RPRA) comments on Stewardship Ontario's Blue Box Program Transition and Stewardship Windup Plan.

Niagara Region's comments and concerns on the Framework, are included below and are generally in line with the Association of Municipalities of Ontario (AMO), Regional Public Works Commissioners of Ontario (RPWCO), the Municipal Waste Association (MWA) and the City of Toronto's previously submitted comments on the proposed Plan in July 2020.

Conflict of Interest and Supporting Competition

The new fee setting methodology is owned and proprietary to CSSA and it appears to be a real, perceived or potential conflict of interest for this fee setting methodology to be a part of SO's Plan.

To further reduce conflict of interest and ensure fair competition, it appears as there is nothing that prevents someone currently working for or hired by SO to leave and start working for Canadian Stewardship Services Alliance (CSSA). Niagara Region would support a required time period (or buffer) between when an individual stops working for SO before they can start employment for CSSA.

Market Development Funds

SO has no further plans for market development and plans to return funds set aside for market development for plastics and glass (approximately \$5.6 million) to stewards in 2021. With the release by the federal government of a Discussion Paper: A Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution, instability of recycling commodities and continued concern of non-recyclable plastic packaging and products entering the market place due to lack of viable end-markets, it does appear to be a good time to stop investment into market development during between now and 2025.

Financial Forecast

The Financial estimates and forecasts should take into consideration, if they have not already, the significant increase in program costs related to collection and processing of Blue Box materials seen by municipalities that had to recently go out tender for these services.

Fee Setting Methodology

Niagara Region does not support SO's proposal to implement the MCD fee setting methodology during the windup of the Blue Box program. As indicated by SO, this change would significantly increase the amount of in-kind payments by printed paper stewards to municipalities instead of cash. Municipalities have seen a significant decrease in newspapers in the Blue Box and it does not seem reasonable that newspaper management costs would increase. This change will directly impact municipal budgets and costs of program to taxpayers.