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LONG-TERM THINKING FOR TODAY'S ISSUES

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November 19, 2021

Attention: Dale Gable  
Resource Recovery Policy Branch  
Ontario Ministry of the Environment, Conservation and Parks  
40 St. Clair Ave. W.  
8<sup>th</sup> Floor  
Toronto, ON, M4V 1M2  
Via email: [dale.gable@ontario.ca](mailto:dale.gable@ontario.ca)

## Re: ERO 019-0045 Administrative Penalties Regulation Made Under the Resource Recovery and Circular Economy Act, 2016

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

As the province moves to further implement full producer responsibility across various waste streams through the *Resource Recovery and Circular Economy Act, 2016*, the current Blue Box program that collects paper, packaging and packaging-like products (PPP) will be transitioned to full producer responsibility starting in July 2023.

Minimizing waste going for disposal to landfills and recovering valuable materials for further use in a circular economy are both important goals of the *Resource Recovery and Circular Economy Act*. The CFFO supports ongoing efforts to reduce waste and promote recovery and reuse of resources in a circular economy. To better support these goals, the CFFO recommends:

- Improved access to recycling of household PPP materials for rural residents
- Improved access to recycling of farm-related plastics and containers across the province
- Up-to-date education for the public on how and why to recycle
- An education-first approach in the use of Administrative Monetary Penalties

### Recycling for Rural Residents and Farms

The CFFO sees benefits in having producers of PPP products responsible for the end-of-life management of these goods, as this will ensure producers are invested in lowering costs for recycling or other forms of processing and, ultimately, in reducing the overall amount of these products that enter the marketplace or end up as waste. **It is important that rural residents are able to participate in recycling household PPP materials.**

Farmers want to be able to recover and recycle farm-related plastics and packaging materials wherever possible. Currently the industrial, commercial and institutional sectors are not included in the new Blue Box program. **The CFFO would like to see more farm-related plastic and container materials included for recycling across the province, with specific collection systems in place designed to allow farmers to reasonably participate.**

## Education on Recycling

Although the concept of recycling is not new to Ontarians, there are still important opportunities to educate the public further and to promote better participation in recycling. **Up-to-date information on the types of packaging that can be recycled and how to ensure they are collected and recycled successfully should be available to the public.**

The public should also be encouraged to consider waste in purchasing decisions. The CFFO would like to see information available to help consumers avoid waste and to understand the costs involved in recycling and waste management.

## Administrative Monetary Penalties

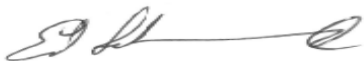
Administrative monetary penalties are a useful tool of enforcement under the new full producer responsibility system. The CFFO supports having these monetary penalties put in place. However, we recommend that **these penalties should be used as a last resort, and that, whenever possible, education should be a first step to encourage compliance before monetary penalties are used.**

## Conclusion

In order to support strong participation in recycling programs and overall reduction of waste, the CFFO recommends improved opportunities for rural residents to participate in household PPP recycling. Beyond household recycling, other programs need to ensure farm-related materials can also be recycled consistently across the province. Education for the public on the new recycling system and the true costs of waste management is important to encourage full participation. The CFFO also supports the implementation of administrative monetary penalties under the *Resource Recovery and Circular Economy Act*, but recommends education as the first step to bring offenders into compliance.

We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario  
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