



Sent by Fax to: 416-314-6748

July 10, 2007

Hon. Laurel Broten
Minister of the Environment
12th Floor, 135 St Clair Ave W
Toronto Ontario M4V1P5

Dear Minister Broten:

Re: AMO/AMRC Discussion Paper on Extended Producer Responsibility

The *Waste Diversion Act*, originally approved June 27, 2002, was hailed as “a very bold, innovative step” that would “ensure the sustainability of the Blue Box program.”

Since its inception, municipalities and stewards have gained a much better understanding of the issues and true costs involved in managing Blue Box materials. Municipalities now recognize that the original Act and associated Blue Box Program Plan (BBPP) design has a number of inherent inequities.

The purpose of this discussion paper therefore is to draw attention to the fundamental funding inequity imposed on Ontario municipalities by the Act and its associated Plan. It is recognized that there have been some positive movements by industry with respect to packaging changes. However, the circumvention of the Act by other businesses has essentially negated gains made over all by industry.

It has become apparent that the Act fundamentally fails to provide the motivation for industry to make the necessary changes to consumer packaging and help to improve provincial diversion of designated blue box materials. As well, as it currently stands, the Act fails to recognize the full cost of managing designated blue box materials, which are not recovered through the blue box program. AMO and AMRC look forward to working with the Province to address municipal concerns as part of the Act's pending five-year mandatory review and will be submitting a separate discussion paper on specific amendments as part of that review.

Sincerely,

Doug Reycraft
President
Association of Municipalities of Ontario

Mike Birett
Chair, Board of Directors
Association of Municipal Recycling Coordinators

cc: John Vidan, Director, Waste Management Policy Branch, Ministry of the Environment
Peter Hargreave, Senior Policy Advisor, Land and Waste, Minister's Office, Ministry of the Environment
Glenda Gies, Executive Director, Waste Diversion Ontario
Derek Stephenson, Program Manager, Stewardship Ontario
AMO members on Municipal Industry Program Committee (MIPC)
AMO-AMRC Waste Management Task Force

