

Recommendation:

That the report C.A.O.-2025-21, dated October 21, 2026, regarding the future of non-eligible sources be received; and

That Council support the draft resolution regarding producer responsibility and forward it to the Ministry of the Environment, Conservation and Parks.

Overview:

Ontario's shift towards Producer Responsibility for dealing with recyclable materials occurred January 1, 2024, and is currently in the transition phase with full Producer Responsibility to start January 1, 2026. During this transition phase, the County of Peterborough opted out of curbside recycling collection. As a result, Circular Materials Ontario (CMO) became responsible for providing a contractor for curbside collection of eligible sources (residential properties) during the transitional period. However, the County was able to continue servicing non-eligible sources during this time through their own agreements.

The County of Peterborough reported on the continuation of collection of non-eligible sources after the completion of the transition phase. County Council voted to discontinue collection of non-eligible sources after the transition period due to high projected costs and tax implications. The County contacted affected organizations through the attached correspondence (**Attachment 1+2**) to inform them of the decision and to present available options to service their properties.

In 2023, CMO reached out to the lower tier Townships to discuss continuing use of existing depots as recycling drop-off points. The Township of Douro Dummer entered into a Depot Operations Agreement (DOA) with CMO through By-law 2023-51 (**Attachment 6+7**), which allowed for the continued use of the Hall's Glen transfer station as a recycling drop-off point. During this contract, the co-mingling of eligible and non-eligible source material is allowed with a small payment deduction for non-eligible source material. The agreement has been positive to date. The Township recently received a Change Notice from CMO as per the Change Management clause from the DOA. This change notice is to extend use of the agreed to depot from 2026 through 2028 to ensure residents continue to have access to Blue Box services where they rely on a depot for garbage delivery. The following is addressed as part of the Change Notice (**Attachment 3**):

- Extension into 2028
- Inclusion of Hall's Glen Transfer Station as one of depots to be extended
- Removal of references to Non-Eligible Sources
- Referenced Blue Box material as defined in the regulation
- Scope of Promotion and Education Services
- Compensation for Depot Operation services effective January 1, 2026 which would reduce our payments from \$3,699 minus adjustments to \$2,226 minus adjustments

As a result, the Township stands to have revenues associated with our collection of residential recycling or eligible sources through CMO reduced by more than 30% and curbside and depot recycling for non-eligible sources within the Township will cease as of January 1, 2026 through the common collection system as administered by CMO.

All non-eligible sources including from Township offices will have to make alternate arrangements to properly dispose of recyclable materials as divertible materials will still not be allowed in our garbage stream. In correspondence received from CMO (**Attachment 4**) on October 1, the blending of eligible and non-eligible materials can continue into the extension period, with the Township inheriting responsibility to haul, consolidate and process its proportionate share of materials deemed non-eligible source. Based on the Townships current operating structure, we do not have the capacity to take these responsibilities.

Staff opinion is that the Ministry of the Environment, Conservation and Parks (MECP) should include all material, independent of their source, into the common collection system. As it stands, recycling costs associated with non-eligible sources will become a burden to the Township through increased landfill burdens and environmental implications.

Conclusion:

Included with this report (**Attachment 5**) is a draft resolution for Council's consideration to send to the MECP, Premier and MPP regarding a request to have the current Regulation amended. Many other municipalities throughout Ontario have developed similar resolutions. Some of the municipalities include: the Township of Cavan Monaghan, the Municipality of Tweed, the Municipality of Strathroy-Caradoc, Haldimand County, the City of North Bay, the Municipality of Red Lake, the City of Markham, and the City of Kawartha Lakes.

Financial Impact:

With the change notice the Township will continue to host the Blue Box program at the Transfer Station. Our revenues from the program will be approximately 30% less and we will be responsible for the processing and appropriate disposal of our proportionate share of items deemed non-eligible.

Township of Douro-Dummer Strategic Plan 2023-2027



Service Modernization and Innovation

Modernizing, refining and innovating services for residents is essential to effectively meet the needs of our community, enhance our operational efficiency, and ensure we remain adaptable in a rapidly changing world.



Business Attraction, Expansion, and Retention

Business attraction, expansion, and retention is vital for the economic health and sustainability of our Township, such as job creation, tax revenue, investing in innovation, maintaining our quality of life, and supporting community stability.



Infrastructure Renewal

Infrastructure renewal is a critical investment for our Township as it will ensure our adherence to health and safety, economic development, investment attraction, environmental sustainability, quality of life, public confidence, and regional competitiveness.