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Environmental Law
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Citizens' Network on
Waste Management



environmental
defence



April 20, 2020

The Honourable Jeff Yurek, MPP
Ministry of Environment, Conservation, and Parks (MOECP)
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

RE: Blue Box transition and new PPP Regulation - Stakeholder Consultations

Dear Minister Yurek,

We are writing, once again, to express our ongoing concern regarding the consultation process that supports the development of regulation for printed paper and packaging (PPP) under the *Resource Recovery and Circular Economy Act* (RRCEA). To date, we have received no response to our December 19, 2019 request to meet with you to discuss the Blue Box Program Plan (BBPP) transition and the new PPP Regulation.

We understand that the Ministry of Environment, Conservation and Parks (MOECP) intends to move forward with a regulation, but the opportunities for stakeholder involvement outside of the consultation groups have narrowed:

1. MOECP has decided to eliminate the policy discussion paper and will go straight to drafting the Regulation.
2. O. Reg. 115/20 temporarily exempts the government from having to comply with Part II of the Environmental Bill of Rights (EBR), including posting to the Environmental Registry.

This is unacceptable. Our organizations have spent several decades supporting waste policy that drives waste reduction and a transition from shared stewardship programs to full producer responsibility. We offer neutral, evidence-based and unfettered perspectives that are critical for PPP regulation, and we aim to achieve the highest environmental outcomes. Excluding or limiting our involvement undermines the integrity of the consultation process, and adversely affects the credibility and soundness of the outcome of this regulatory exercise.

We urge you to set a meeting with us by April 30, and that the meeting occurs no later than May 15. Recognizing the seriousness of the COVID-19 health crisis, we are happy to meet with you remotely using teleconferencing technology. In addition, we hereby request your assurance that the draft regulatory proposal will

be posted on the Environmental Registry for public review and comment despite O.Reg.115/20.

Sincerely,



Richard Lindgren
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Ashley Wallis
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CC: Charles O'Hara, Director, Resource Recovery Policy Branch