

**To: David Creery, Chief Administrative Officer**  
**From: Dan Locke, Director of Public Works**  
**Re: Recycling Producer Responsibility Model and Transitioning to Organics Update**

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### **AIM**

To update Woodstock City Council on upcoming changes to waste/recycling collection services.

### **BACKGROUND**

In June 2021, the Province released a new Blue Box regulation (O. Reg 391/21) that makes producers of the Blue Box material fully responsible for their products and packaging once consumers dispose of them. Curbside collection of the recycling materials will be the responsibility of the producers starting Jan 1, 2026. Industrial, commercial and some institutional (IC&I) properties are considered non-eligible sources and there will be no curbside collection by the Producers for these sources starting Jan 1<sup>st</sup>, 2026.

### **Curbside Collection from Non-Eligible Sources**

The City of Woodstock currently provides curbside collection services to a number of non-eligible sources which are not included in the Producer Responsibility Blue Box regulation model.

While the curbside recycling service to eligible sources (i.e. residences, multi-residential buildings, some schools, some long term care and retirement homes and some public spaces) must be maintained in the new recycling model, the producers are not obligated to include service to certain properties, such as the Industrial, Commercial and Institutional (IC&I) sector including municipal buildings, commercial portion of mixed-use properties and for-profit long term care and retirement homes. Eligible sources with commercial businesses on the main floor are also deemed as non-eligible sources for the entire apartment building. (i.e. apartment building with the main floor commercial.)

Public and private schools (excluding colleges and universities) are included in the regulation as an eligible source. Should City Council desire to continue to collect from non-eligible sources once the Blue Box transitions to the producers, then the City would be responsible for all costs associated in providing that service that are not covered by the County.

Currently, eligible and non-eligible sources are co-collected together at the curb. This results in route and collection efficiencies as separate collection vehicles are not required. However, Woodstock as an eligible community will need to provide separate collection starting January 1, 2026, as Circular Materials Ontario (CMO) will not permit co-collection after the transition period and therefore additional costs will be incurred by Oxford County or Woodstock on January 1, 2026, for separate collection services.

To better understand the breadth of the issue for Woodstock the following outlines the current non-eligible source curbside collection locations/stops.

### **Non- Eligible Locations**

Places of Worship – 17

Government/Municipal Buildings – 19

Private Owned Retirement – 2

Businesses with Apartments above – 59

Businesses, Commercial, Stores, Plazas, Restaurants etc. – 259 this includes the Hospital and all industrial sources.

While staff believe this is to be a comprehensive list, we certainly expect to find additional stops that fall into this category when the new Producer Responsibility model is in place.

**It is important to note that the downtown in its entirety will be non-eligible for collection under the new system.**

### **COMMENT**

#### **Recycling**

Through discussions with Circular Materials Ontario (CMO), the agency that represents the Producers, there is a requirement to only allow bidders of the entire catchment area. In the City of Woodstock's case, the geographical area of the County of Oxford is the catchment area that we fall into. Therefore, the City of Woodstock has not been allowed to bid on the curbside collection solely for the City of Woodstock.

The County of Oxford has already opted out of curbside collection of Recycled Materials for the parts of the County in which they oversee.

On May 22, 2024 County staff took a report to Oxford County Council that indicated they would be establishing service for the curbside collection of non eligible sources. The level of service approved by County Council will form part of the County Waste budget and be funded by the County. City Council can establish a level of service that is different from the County, however the cost of any level of service in excess of the County will require City funding. Once we know what direction the County is going then further options with the financial impacts can come back to Woodstock Council for their consideration.

The County's report didn't include what the outcome was for the service at the EnviroDepot for Non-Eligible source of Recycling materials. This requires some more discussion between the City and the County.

#### **Organics**

The Provincial Food and Organic Waste Policy Statement outlines the threshold that Woodstock currently is required to meet by 2025. Municipalities in Southern Ontario are to meet the sector-specific waste reduction and resource recovery targets of 50% waste reduction and resource recovery of food and organic waste generated by single-family dwellings in urban settlement areas by 2025. Municipalities in Southern Ontario with a population greater than 50,000 and a population density greater than or equal to 300 persons

per square kilometre must provide curbside collection of food and organic waste to single-family dwellings by the effective date.

Of the Oxford County Municipalities, Woodstock meets and Tillsonburg will soon meet the population/ density thresholds identified in the policy statement requirements for organic waste diversion.

Currently, the City is in discussions with the County to develop a program in which the residents of Woodstock would have curbside collection of Organics materials. Program details would be defined and brought back to both County Council and City Council for their consideration and feedback. The County has recently sought public consultation to assist in defining the program and is included in the May 22, 2024 report to County Council.

Currently, the City has 10 trucks outfitted with cart tippers, 2 of which have lift arms that can perform this type of work. Each truck prior to the implementation date will need to be serviced to ensure that it is properly sealed for the organics program. This would require approximately a 1-2 day servicing in the garage to service them. This is to mitigate the liquid that is part of an Organics collection leaking from the truck. Also, Council approved two other trucks that have a March 2025 delivery date that will also be set up to perform this work. Given our experience with the Garbage and Recycling route services, staff estimate 4 trucks would be sufficient to adequately provide the service.

## **PROPOSED OPTIONS**

### **Recycling**

Based on CMO's requirements, Woodstock is unable to bid on the Oxford Catchment area therefore Woodstock will not be the curbside recycling collection provider effective Jan 1, 2026. The only alternative to this is if the Contractor that is awarded the catchment area desires to have Woodstock continue to deliver this service as a subcontractor. This is unlikely as initial discussions with our current contractor GFL have indicated that they are not interested in this direction, other likely contractors have not responded at this time.

As a result, it is expected that curbside recycling collection will no longer be on the same day as garbage collection for many residents.

### **Options for Non-Eligible Sources and Depot**

#### **Option 1: Discontinuation**

The City would no longer provide any service for Recycling Collection to any source. The Non-Eligible Sources would need to find their own methods to dispose of the recycling materials that they obtain and Residential is collected by the Producers commencing Jan 1, 2026.

#### **Option 2: Curbside Collection**

The City would provide curbside collection of recycling materials at non-eligible locations indicated above as well as any new locations that fall into the same non-eligible category. The funding for this option would be funded by the County's determined level of service, which is

yet to be established. Any additional desired service level by City Council would need to be either funded by the City of Woodstock or through a user fee for each individual location. For this option, we would first need to know the County's level of service for non-eligible curbside collection commencing Jan 1, 2026.

### **Options for Organics**

Woodstock will no longer be performing curbside collection of recycling material citywide therefore the ability to pivot and utilize the current staff and fleet to collect the organics would be a viable option to redeploy staff and equipment.

We await the determination by County Council for the level of service and a decision of whether or not City forces are able to provide the collection services. This will be done through the County issuing an RFP for Services, if Woodstock can demonstrate financial competitiveness with the bids and is able to meet the County's deployment timelines, then it is preferred that the City be granted the ability to deliver organic collection services within City limits. City Staff anticipate that Public Works to be ready to deploy the required resources (Staff and Equipment) starting at the beginning of 2026. This is earlier than the Organics rollout date that the County has indicated in their County Council report. Ideally, the start date of January 2026 coinciding with the discontinuation of the Curbside Recycling Collection will allow the staff and equipment to be reallocated to the organics program. However, it is City Staff opinion that the critical path to deliver the new organics program is the rollout of the supply of organic carts, promotion and education of the new program by the County.

### **FINANCIAL IMPACT**

#### **Recycling**

The change to Producer responsibility means that curbside collection of recycling materials would be funded by the Producers and as such the Oxford County funded budget would cease to exist. Some services such as non-eligible sources of curbside collection and convenience depot materials (EnviroDepot Recycling) would need to be funded by the City of Woodstock or the County of Oxford or through a user fee.

#### **Organics**

It is expected that the new program for organics collections would be funded by the County of Oxford.

### **RECOMMENDATION**

That Woodstock City Council receive the report regarding Recycling Producer Responsibility Model and Transitioning to Organics Update as information.

*Authored by: Dan Locke, C.E.T., Director of Public Works*

*Approved by: David Creery, P.Eng., MBA, Chief Administrative Officer*