

Blue Box Recycling Program Changes Take Effect in Ontario



On September 4, Ontario published the final version of controversial changes to its Blue Box recycling regulations. Here's a briefing on the 8 things EHS coordinators in Ontario need to know about the final regulations before they officially take effect on January 1, 2026.

The Ontario Blue Box Recycling Program

The centerpiece of the province's waste management strategy for decades, the Blue Box program originally relied on municipalities and First Nations communities to collect and recover glass, plastic, metal, and paper under the oversight of a non-profit organization called Stewardship Ontario. But in July 2023, the province implemented a new system shifting these responsibilities to the companies that produce the materials. **The strategy:** Incentivize producers, referred to as Producer Responsibility Organizations (PROs), to use sustainable materials that are easier and cheaper to recover and reuse.

The transition was originally slated to take full effect in 2026, with PROs required to expand collection of blue box materials to more apartments, schools, long-term care homes

and retirement homes. The new rules would also require PROs to meet mandatory recovery targets for specific categories of materials, a major departure from the “best efforts” standard to which producers are currently held.

But on June 4, 2025, the Ontario Ministry of the Environment proposed new regulations to both delay and scale back the expanded Blue Box rules. The government defended the move as necessary to contain rising costs and ensure the program’s efficiency and long-term sustainability. Critics contended that the new regulations would gut the program and significantly harm the province’s recycling efforts.

The Final Blue Box Regulations

After an unusually robust public consultations in which 283 different stakeholders submitted comments, the Ministry issued the final version of the regulations on September 4.

1.Recovery Targets Remain but Only “Best Efforts” Required Until 2028

Proposed: The June 2025 regulations proposed delaying recovery targets for paper, glass, metal, rigid plastic, and beverage containers until 2031 to allow producers to make the necessary investments and plans for collection and recycling. During this 5-year phase-in period, producers would have only had to make “best efforts” to meet their targets.

Final: The final version maintains the current targets for these material categories until 2028 while also requiring producers to use “best efforts” to comply. But after 2028, producers will have to go beyond “best efforts” to achieve targets or risk potential compliance or enforcement action.

2. Recovery Target Increases Delayed Until 2032

Proposed: Recovery target increases would have taken effect in 2030.

Final: Recovery target increases will take effect in 2032.

3. Phase-in of Flexible Plastic Recovery Targets

Proposed: The June 2025 regulations would have cut the 2026–2029 recovery target for flexible plastics from 25% to 5% while deferring any future increases for 5 years.

Final: The final regulations provide for a phased increase in the flexible plastics recovery target to:

- 10% in 2026–2027;
- 15% in 2028–2031; and
- 25% from 2032 onwards.

Producers need only meet the “best efforts” standard for the 2026–2027 recovery target but will be subject to penalties for failing to meet the target thereafter.

4. Deferral Rather than Elimination of Expanded Collection Requirements

Proposed: The June 2025 proposed regulations called for cancelling the planned expansion of blue box material collections to additional multi-residential buildings, long-term care and retirement homes and schools.

Final: The final regulations keep the expansion but defer it until 2031 to give producers more time to develop the collection infrastructure necessary to service the new

locations.

5. Allowing Energy Recovery to Count Toward Diversion Targets

Proposed: The June 2025 regulations allowed producers to count the use of non-recyclable materials for energy recovery towards 15% of their management targets.

Final: Producers may count residue from recovery processes for up to 15% of their mandatory recovery target for a material category if:

- The residue comes from recovery processes that are either: (i) supplied for use in a product that's fuel or fuel supplement, or (ii) incinerated for the purpose of producing electricity.
- Such use is the sole practical use of the recovered materials.

6. New Reporting Requirements

The final regulations establish new rules requiring PROs and material processors to file a mid-2027 report on diversion performance enabling the Resource Productivity and Recovery Authority (RPRA) to assess the progress they're making in meeting their targets. Under current rules, PROs must report by August 31, 2027, on the weight of blue box materials collected and processed under agreements for the producers' collection systems from the first 6 months of 2027, including any supplemental and alternative collection systems; by the same deadline, processors must report the weight of blue box material supplied to Ontario consumers that they received from the first 6 months of 2027 and the weight of recovered resources derived from such material, broken down by material category.

7. Registered Processor Requirement

To keep collected materials from being sent directly to a landfill, the final regulations require producers to ensure that the blue box material they collect is processed by a registered processor within 3 months after collection.