

FREE WEBINAR

Beyond the Basics: Advancing EPR in the Great Lakes Region

 December 10, 2025  1:00 - 2:30 EST

SPEAKERS:

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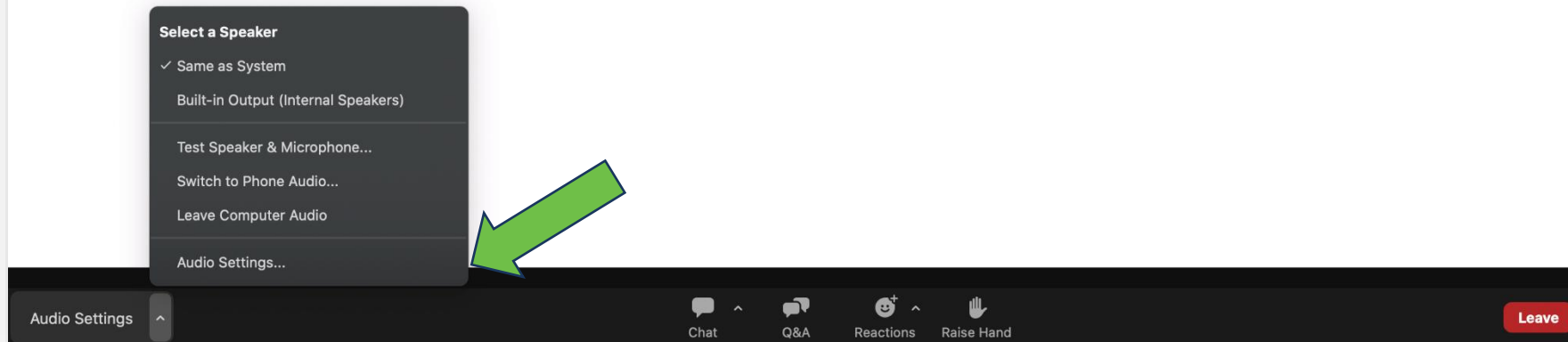
Minnesota Pollution Control Agency

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Beyond the Basic: Advancing EPR in the Great Lakes Region

December 10, 2025



**PRODUCT
STEWARDSHIP
INSTITUTE**



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Mallory Anderson –
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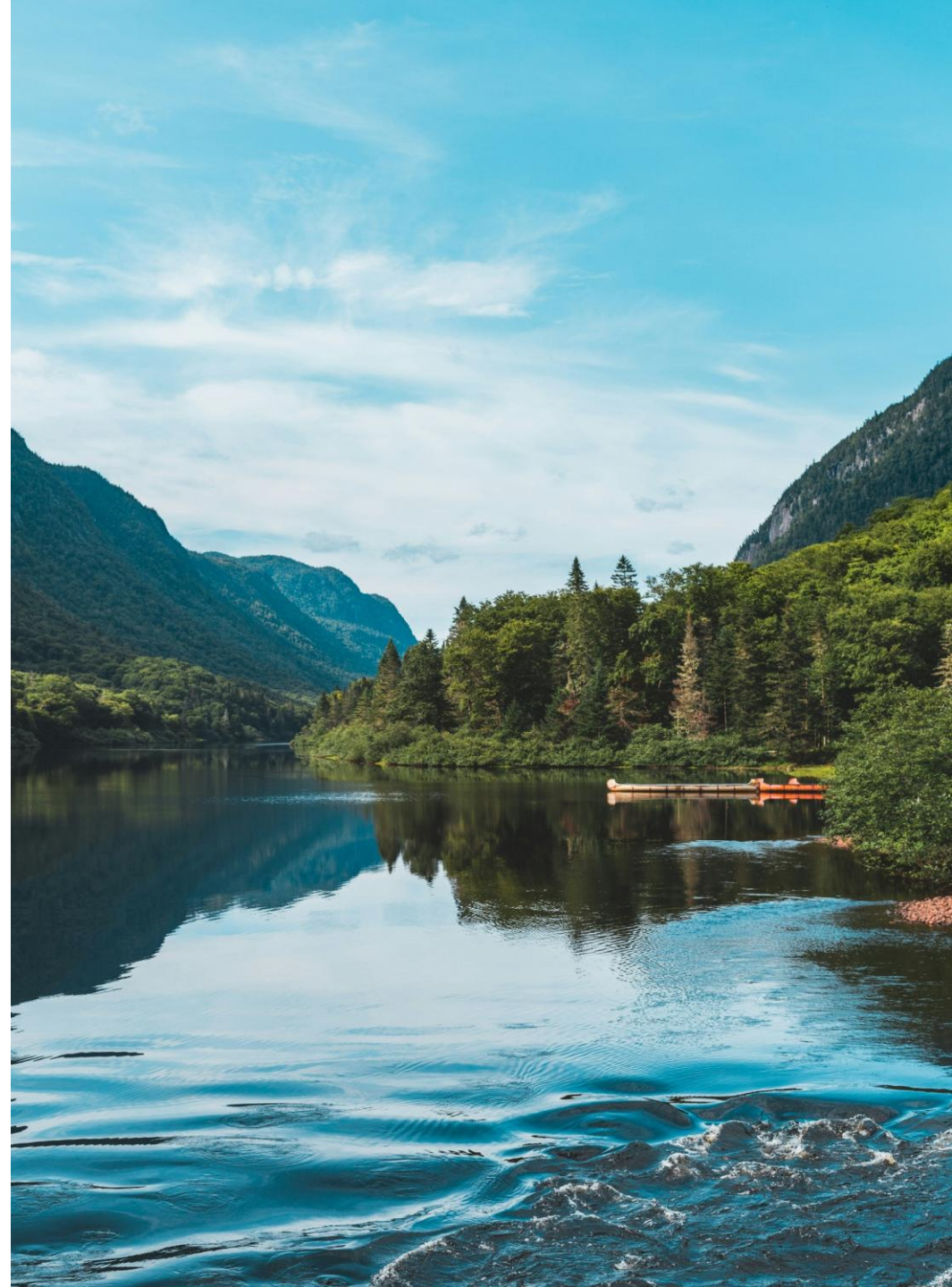
Part I Focus

- **Groundwork:** What EPR is and how it works in practice
- **Why now:** Why EPR matters for Great Lakes states, communities, and recyclers
- **Who's involved:** Roles for state and local governments, producers, PROs, NGOs, and others




Part II: Today's Focus

- **Program implementation insights:** Lessons learned, early challenges, and practical takeaways.
- **State-level progress:** What implementation looks like in practice, and the learning curves emerging as states move from legislation to execution.
- **Critical decision points:** Governance, planning, data infrastructure, and logistics



EPR **Laws** in the Great Lakes (Canada & the US)

- 
- **Ontario (4):**
 - Packaging & paper (Blue Box)
 - Hazardous & special products (HSP)
 - Tires
 - Electronics
 - **Québec (4):**
 - Packaging & paper
 - Electronics
 - Batteries
 - Paint

TOTAL: 8 PROVINCIAL EPR LAWS

- **Illinois (6):** mercury switches, electronics, mercury thermostats, drug take-back, paint, batteries
- **Minnesota (6):** rechargeable batteries, electronics, paint, mercury thermostats, packaging, boat wrap
- **New York (6):** rechargeable batteries, electronics, mercury thermostats, drug take-back, paint, carpet
- **Indiana (2):** mercury switches in vehicles, electronics
- **Pennsylvania (2):** mercury thermostats, electronics
- **Wisconsin (1):** electronics
- **Michigan (1):** electronics
- **Ohio (0):** no statewide EPR laws

TOTAL: 24 STATEWIDE EPR LAWS



COUNCIL OF THE
GREAT LAKES REGION
Solving for Sustainability[®]

Ally Walker – Council of the Great Lakes Region



**COUNCIL OF THE
GREAT LAKES REGION**
Solving for Sustainability®



Circular Great Lakes
FORGING A FUTURE WITHOUT WASTE



A scenic view of a lake with rocky islands and a forested shoreline under a blue sky. The text is overlaid in white on a dark blue background.

Pam Castillo - Resource Productivity and Recovery Authority (RPRA)

Ontario's Circular Economy Framework and the Resource Productivity and Recovery Authority

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What is Ontario's producer responsibility framework?

- RPRA supports the transition to a waste-free Ontario, by administering the [Resource Recovery and Circular Economy Act, 2016](#) (RRCEA) and the [Waste Diversion Transition Act, 2016](#) (WDTA), and their associated regulations.
- The WDTA outlines the legislative framework for winding up and transitioning Ontario's legacy waste diversion programs to the new producer responsibility framework under the RRCEA.
- The RRCEA provides a new producer responsibility regulatory framework for waste diversion and resource recovery where producers are individually accountable and financially responsible for their products and packaging once consumers dispose of them.
- Under the RRCEA, RPRA supports businesses to comply with producer responsibility requirements for:
 - [Tires](#),
 - [Batteries](#),
 - [Information Technology, Telecommunications, and Audio-visual \(ITT/AV\) equipment](#),
 - [Hazardous and Special Products \(HSP\)](#),
 - [Lighting](#), and
 - [Blue Box materials](#)
- RPRA is also responsible for undertaking enforcement actions, when required.

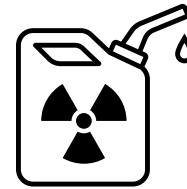
Ontario's Producer Responsibility Programs

RPPRA supports businesses to comply with the producer responsibility requirements of the six (6) RRCEA programs:



Tires

All new tires marketed on new vehicles or separately



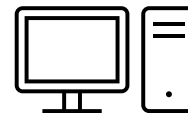
HSP

Oil filters, oil containers, antifreeze, pressurized containers, pesticides, fertilizers, paints and coatings, solvents, and mercury-containing devices (barometers, thermometers and thermostats)



Batteries

Single-use and rechargeable batteries under 5kg



ITT/AV

Information technology, telecommunications and audio-visual equipment (ITT/AV)



Blue Box

Beverage containers, glass, flexible and rigid plastic, metal, paper and certified compostable materials



Lighting

Light bulbs, tubes and lamps supplied separately from fixtures

Ontario's Producer Responsibility Framework

Roles and Responsibilities



Ontario Government (Ministry of the Environment, Conservation and Parks)

- Develops, approves and issues legislation
- Makes amendments to legislation, as required
- Issues direction letters



Resource Productivity and Recovery Authority (RPRA)

- Implements and enforces regulations
- Supports regulated community to understand requirements and achieve compliance
- Has power to take the following actions to ensure compliance:
 - Inspections and audits
 - Investigations
 - Compliance orders
 - Administrative penalty orders
 - Prosecutions

Ontario's Producer Responsibility Framework

Roles and Responsibilities



Producers

A **producer** is a person who supplies blue box material (packaging, paper products or packaging-like products) comprised of paper, glass, metal or plastic, or a combination of these materials to consumers in Ontario. The obligated producer for products and packaging is determined based on the producer hierarchies.

[Learn more about producers here](#)



Producer Responsibility Organizations (PROs)

A **PRO** is a business established to contract with producers to provide collection, management and administrative services to help producers meet their regulatory obligations.

This can include arranging the establishment or operation of collection and management systems and preparing/submitting reports.

[Learn more about PROs here](#)



Processors

A **processor** is a person that processes Blue Box materials used in Ontario for the purpose of resource recovery. PROs and producers will have contracts with registered processors for the purposes of meeting management requirements.

[Learn more about processors here](#)

How does RPRA operate?

- Established in 2016 by the Government of Ontario as a Delegated Administrative Authority (DAA)
- Compliance decisions are independent from government
- Governed by an 11-person skills-based Board of Directors
 - Five directors are appointed by the Minister of the Environment, Conservation and Parks and six directors are elected by the Board
- Accountable to the Ontario Minister of the Environment, Conservation and Parks
- RPRA does not receive any government funding and funds its activities through fees charged to regulated parties

What are RPRA's responsibilities?

- Overseeing Ontario's existing legacy waste diversion programs until they are wound up
- Developing and operating an online registry for producers responsible for materials obligated under the RRCEA to register with RPRA and report on waste recovery performance
- Developing and operating digital reporting services for the Ministry of the Environment, Conservation and Parks's excess soil and hazardous waste management programs
- Managing, analyzing and reporting on the information in the registry
- Supporting businesses in complying with regulatory requirements
- Carrying out compliance and enforcement activities
- Providing information to the public about Ontario's progress in advancing a circular economy

Ontario's producer responsibility regulatory framework

An empowered producer responsibility regulator

The Ontario Government established the RPRA as a fully empowered regulator.

- **Collect, Audit and Verify Data:**

- Requires RPRA to establish a Registry (electronic database) to implement producer responsibility requirements: registration of obligated businesses and reporting of supplied to market data and performance to targets

- **Compliance and Enforcement Powers**

- Inspect, investigate and enforce against non-compliant companies, including free riders
- Enforcement powers include the ability to issue administrative penalties (monetary penalty for certain contraventions)

- **Public Reporting**

- Managing, analyzing and reporting on the information in the registry
- Providing information to the public about Ontario's progress in advancing a circular economy

Ontario's Blue Box Program Transition

- On August 15, 2019, the Minister of the Environment, Conservation and Parks issued direction to RPRA and Stewardship Ontario to begin transitioning Ontario's legacy Blue Box Program to the new producer responsibility regulatory framework outlined in the Resource Recovery and Circular Economy Act, 2016 (RRCEA) and its associated regulations.
- Ontario's legacy Blue Box Program was funded approximately 50% by municipalities and 50% by producers (or stewards) and fully operated by municipalities. Stewards fulfilled compliance obligations under the legacy Blue Box Program by reporting to Stewardship Ontario (SO).
- The transition of the Blue Box Program to the new producer responsibility regulatory framework began on July 1, 2023, and will end once the final group of communities complete the transition on December 31, 2025.
- Under the new producer responsibility framework, Blue Box producers are now 100% financially and operationally responsible for collection, management and recycling of blue box materials across Ontario.
- Obligated producers must register and report directly to RPRA.

Blue Box Material

- Ontario's [Blue Box Regulation](#) designates 3 types of Blue Box materials:
 - Blue Box packaging
 - primary packaging
 - transport packaging
 - convenience packaging
 - service accessories
 - ancillary elements
 - Paper products
 - Packaging-like products
- Obligated products and packaging are those primarily composed of glass, flexible or rigid plastic, metal, paper or a combination of these materials.

NOTE: Blue Box materials also include those that are certified compostable (different reporting requirements and obligations than the other Blue Box materials).

Ontario's Blue Box Regulation

There are seven (7) material categories outlined in the Regulation:

Material Category	Obligated when supplied to:	Examples
1. Beverage Containers	Consumers	Can of pop, bottle of water, bottle of juice, drinkable yogurt, etc.
2. Glass		Glass bottles, jars, etc.
3. Flexible Plastic		Unmoulded plastic (e.g., plastic bag, film, wrap, pouch)
4. Rigid Plastic		Moulded plastic (e.g., food or product containers, tubs, pails, etc.)
5. Metal		Metal food cans, foil, trays, plates, etc.
6. Paper		Newspaper, magazines, greeting cards, calendars, notebooks, etc.
7. Certified Compostable Materials		Materials that are certified under one of the standards in the Regulation

Producer Hierarchy



Who is a Blue Box producer

- A person is considered a producer under the Blue Box Regulation if they supply Blue Box material (packaging, paper products or packaging-like products) comprised of paper, glass, metal or plastic, or a combination of these materials to consumers in Ontario.
 - Under the Blue Box Regulation, consumers are individuals who use a product and its packaging for personal, family or household purposes, or persons who use a beverage and its container for personal, family, household or business purposes.
- The obligated producer is further determined based on hierarchies for packaging and for paper products and packaging-like products.

Producer Hierarchy

Order of Responsibility	Description of Responsible Entity
1	The <u>brand holder</u> of the product who is resident in Canada.
2	If there is no brand holder, the importer of the product who is resident in Ontario.
3	If there is no resident importer, the retailer that supplies the product to consumers in Ontario.

NOTE: For Blue Box packaging, each of those identified above are only obligated for the portion of the Blue Box packaging they added to the product.

For example, if a retailer adds Blue Box packaging to a product for which there is a brand holder in Canada, the brand holder is only responsible for their portion of the Blue Box packaging, and the retailer is responsible for what they added.

Producer Exemptions

Exemption Type	Producer status	Exemption
Revenue-based	Any producer whose gross annual Ontario revenue from products and services is less than \$2,000,000 is exempt from all producer requirements under the regulation.	Must maintain records only
Supply-based	A producer whose annual revenue is >\$2 million may be exempt from collection and management requirements if their annual supply weight is below the allowable exemption threshold for a material category. Example: Beverage container producers receive a supply-based exemption if levels are below 1,000kgs.	Must register and report only.
	A producer whose annual revenue is more than \$2 million, and supply weight in at least one material category is above the tonnage exemption threshold	All obligations apply: register, report, collection, management, P&E Must only meet management requirement in material categories where they are above the exemption level

Producer management, collection and P&E requirements



Blue Box Producer Requirements

- **Register** with RPRA and **report** annually
- Meet mandatory and enforceable requirements for Blue **collection systems** for Ontario (e.g., establish and operate system)
- Meet mandatory and enforceable requirements for managing collected Blue Box materials, including meeting a **management requirement** (e.g., recycle/recover the material that was collected)
- Meet mandatory and enforceable requirements for **promotion and education system**
- Provide third-party audits of actions taken towards meeting their collection and management requirements, and report on those actions to RPRA through their annual performance reports

Producer management requirements

- A producer's management requirement refers to **how much Blue Box material they must ensure is collected and processed into recovered resources each year.**
- Management requirements are calculated based on what a producer supplied into Ontario one year prior and the resource recovery percentage as set in the regulation and is calculated separately for each Blue Box material category that was supplied.

Example: Company X supplied 500,000 kg of rigid plastic to consumers in Ontario during the 2024 calendar year. Based on this information and using the resource recovery percentage set in the regulation, Company X will be required to manage 250,000 kg of rigid plastic (500,000 kg x 50%) in the 2025 performance year.

Note: Some producers must report to RPRA but are exempt from management requirements (i.e., annual supply falls below the exemption threshold), including collection, management or promotion and education obligations.

Management Requirement = A × B where,

- “A” is the weight in tonnes of blue box material in the material category that the producer is required to report in the previous year,
- “B” is the recovery percentage

Curbside and Depot Collection System requirements

All producers with management requirements must establish and operate a curbside and depot collection system in Ontario. This is commonly referred to as the **common collection system**.

- Communities that currently or previously received curbside collection must receive curbside collection
- Communities that currently or previously received depot collection must receive either curbside or depot collection.

Promotion and education (P&E) requirements

- All producers and PROs who operate a collection system must implement a P&E program to educate Ontario residents.
- Must inform residents of:
 - what can or cannot be put into a blue box
 - collection services offered (including curbside collection dates and depot locations)
 - how to replace or request a new blue box
 - telephone number and email address for questions or concerns

Enforcement of Ontario's circular economy laws



RPRAs compliance approach

Outcome-focused: RPRAs goal is to achieve the desired outcomes of legislation and policy while minimizing unnecessary burden on the people we regulate

Risk-based: RPRAs targets our efforts based on risk to guide compliance decisions and activities, including how to allocate limited compliance resources to optimize achievement of policy objectives

Prioritizes proactive communication and education: Ensures that regulated individuals and businesses have a clear understanding of their requirements to prevent non-compliance before it occurs

Progressive: RPRAs tailors the choice of compliance tool to the nature of the noncompliance and desired outcome:

1. proactive education and awareness
2. inspections and audits
3. communication to address non-compliance
4. compliance orders
5. administrative penalty orders
6. prosecution

Compliance orders and administrative penalties are [posted on the RPRAs website](#) as they occur. Other [compliance activities](#) are tracked and reported annually.

Lessons and takeaways

- EPR policy framework that establishes obligations for individual producers to meet performance requirements
- Alignment of producer requirements (who is the obligated producer, material definitions, reporting requirements) will help to reduce administrative burden and build support for EPR policy
- Enforceable EPR requirements and a fully empowered regulator are key to the success of EPR policy, establishing a level playing field and meeting environmental outcomes
- Phase in EPR requirements to create awareness of requirements among all system actors and stakeholders (producers, PROs, service providers, municipalities, and residents)




Mallory Anderson – Minnesota Pollution Control Agency



Packaging Waste and Cost Reduction Act

Mallory Anderson, Packaging EPR Coordinator

December 2025

A large pile of discarded plastic bottles and containers, including beer bottles, water bottles, and various plastic jugs, illustrating the waste that EPR laws aim to address.

In early 2024, Minnesota became the fifth state to establish an extended producer responsibility (EPR) law for packaging and paper products.

EPR policies incentivize more sustainable design and hold producers responsible for reducing the environmental impacts of the items they produce and managing them throughout the entire life cycle.

Outcomes

- ✓ Require packaging and paper products to be reusable, recyclable, or compostable by 2032.
- ✓ Reduce customer's cost of recycling by at least 90%.
- ✓ Incentivize sustainable packaging.
- ✓ Expand options for refill and reuse.
- ✓ Expand recycling service access and convenience.
- ✓ Simplify and standardize recycling across the state by establishing a universal recycling list.

What materials are covered?

Covered materials include:



Packaging – *materials to transport, market, protect, or handle a product*



Food packaging – *materials to market, protect, handle, deliver, serve, contain, or store food and beverages*



Paper products – *excluding bound books or products deemed unsafe or unsanitary to handle by recycling and composting facilities*

Exempt materials

- Includes a list of specific exemptions primarily focused on packaging related to drug or medical devices, certain hazardous products, and materials managed through another program (e.g., PaintCare). It also includes news and magazine publications of a certain circulation limit.
- Defines a process where the MPCA can approve additional exemptions **if** a specific federal or state health and safety requirement prevents the material from being reduced or made reusable, recyclable, or compostable.



By 2032 all covered materials must be refillable, reusable, recyclable, or compostable.

Acceptable material collection lists



Recyclable



Compostable



Alternative collection

What are the program outcomes?



Developed by the MPCA – overarching statewide requirements for:

- Recycling rate, Composting rate, Reuse rate, Return rate
- % of covered materials to be reduced overall
- % of postconsumer recycled content to be used, as applicable by materials



Proposed by the PRO – material specific performance targets to benchmark to the statewide requirements:

- Recycling rate, Composting rate, Reuse rate, Return rate
- % of covered materials to be reduced overall
- % of postconsumer recycled content to be used, as applicable by materials



Advisory Board

The advisory board provides recommendations and oversight of both the PRO and the agency on program implementation.



Producers

Producers must establish a Producer Responsibility Organization (PRO) and pay fees to the PRO based on what is sold into Minnesota.



MPCA

- Provide oversight and enforcement
- Establish statewide requirements
- Complete Needs Assessment
- Create state-wide lists

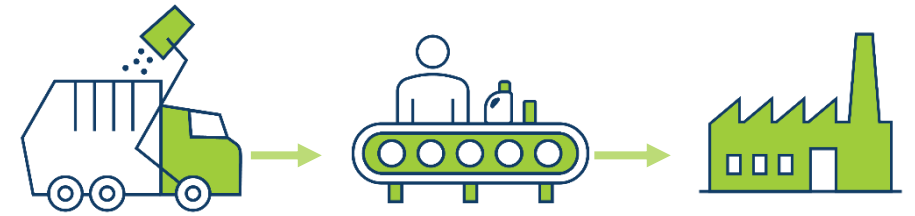


Producer Responsibility Organization

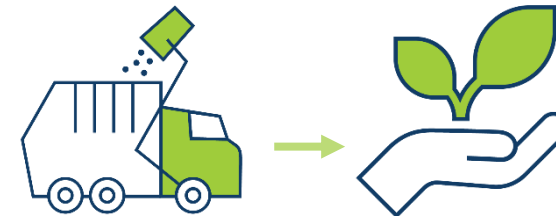
The PRO puts together a plan and reimburses costs of the reuse, recycling, and composting of covered materials.

Service Providers

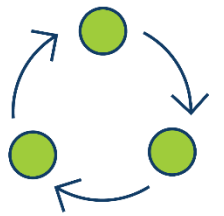
Examples include haulers, recycling facilities, and cities that contract for collection services.



Recycle



Compost



Reuse



Two-phased assessment series



Preliminary Assessment:

- Reviews existing data from reporting and planning documents.
- Establishes a summary of the system for recycling and composting as it is today.

Needs Assessment:

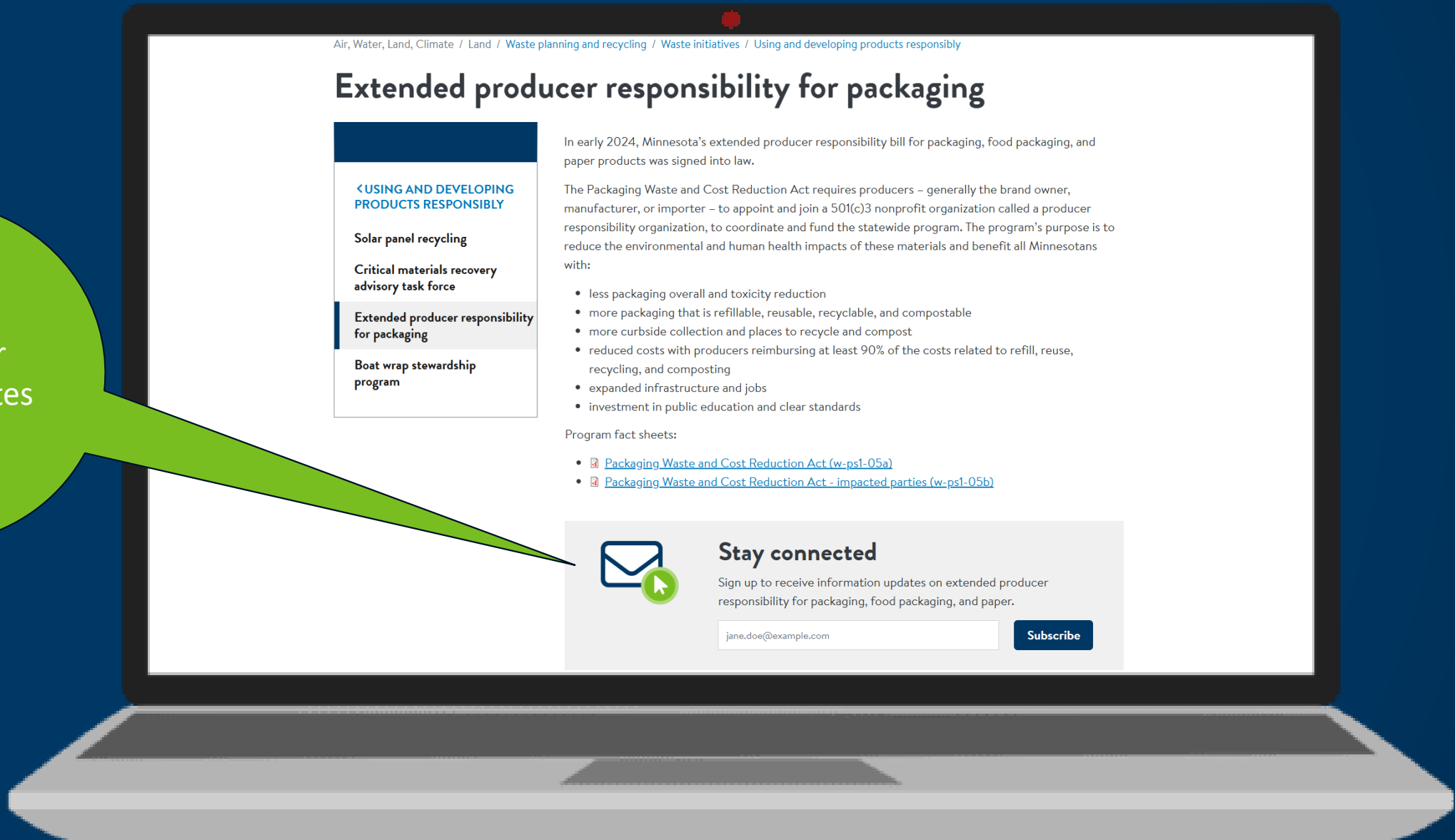
- Evaluates waste reduction, reuse, recycling, and composting and sets the baseline for program measures and outcomes – including proposals for statewide requirements
- Includes data collection from municipalities, counties, waste haulers, waste and recycling facility operators, and markets to identify where investments should be made in collection, sorting, and end markets.
- Includes engagement with interested parties on key topics covered like visioning the future system, use of third-party certifications, toxics and environmental outcomes, and reimbursements to service providers.

Implementation challenges and lessons learned

- Timing and navigating complex requirements within the law
- Pushing for change in programs that are well established
- Build a team quickly and protect their time

Stay connected with updates

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Questions?

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Sarah Bonvallet – Reverse Logistics Group



Implementing EPR Law: From Plan to Reality

Presentation for
Beyond the Basics: Advancing EPR in the Great Lakes Region

By: Sarah Bonvallet, Reverse Logistics Group
December 10, 2025





Sarah Bonvallet – Operations
Program Coordinator

Reverse Logistic Group

- Started in Europe and have expanded globally for 19 years
- We are an asset-light and tech enabled company
- We stay true to the intent of EPR law
- We are not a radical change organization

**EPR Compliance
&
PRO Service Provider**



Wrap Recycle Right

In early 2024, Minnesota became the first U.S. state to pass a Boat Wrap EPR law.

2025 Program Milestones

- **February** CIFFRO, the Stewardship Organization, was incorporated as a MN non-profit
- **March** CIFFRO, with RLG assistance, submitted plan to MPCA
- **August** MPCA approved final plan
- **September 1st** Sales Ban went into effect

Program Goals

- 2030 – 50% of boat wrap sold must be recycled
- 2035 – 80% of boat wrap sold must be recycled





*Passing an EPR law is only
the beginning, the
challenge is making it work*

Topics Covered

Legislative Challenges

Implementation Strategies



Legislative Challenges

Legislative data is just the starting point—it rarely tells the full story.

Boat Wrap Challenges

- Material Assumptions
- Flawed or Vague Language
- Limited Enforceability
- Data Limitations and Assumptions

Legislations is usually thinking about the WHY but implementation needs to think about the HOW.



Operational involvement during Plan Writing

Integrate operations early - Connecting the plan-writing phase to operational realities from the start ensures efficiency and sustainability.

Key Points

- Including individuals who will execute the plan helps keep practicality and enforceability front of mind.
- Plans need operational strength: A well-written plan without operational “teeth” creates a weak foundation.
- Adapt based on research
- Establish decision-making criteria whenever you can



Implementation Framework

A guiding document that summarizes all commitments and deliverables outlined in the EPR plan, keeping implementation accountable and in alignment.

Key Points

- Synchronize elements - EPR implementation requires outreach, logistics, and operations moving in sync to build credibility and efficiency
- Connect plan to operations early
- Create clear decision criteria - Establish practical guidelines to strengthen planning.
- Implementation Framework
 - Organize commitments to maintain accountability and clarity.
 - Identify and Correct Gaps: Look to your Framework to reveal blind spots allowing proactive adjustments before rollout.



Build Partnerships, Relationships and Datasets

Key Points

- Accurate, well-structured data is the backbone of successful EPR implementation.
- Validate external data and dig into granular details—they reveal the “why” behind trends.
- Build a master stakeholder list early with defined groups, engagement scores, and logistical details
- Collaborate with others doing similar work to strengthen data and share best practices.
- Legislative data is a starting point—verify and refine it through an implementation lens; build systems for ongoing checks.



Logistic & Relational Mapping

Key Concepts

- Map Material Flow: Track movement from collection sites to haulers, consolidators, and recyclers to uncover operational gap
- Start from Both Ends: Begin with collection and end markets before tackling hauling and consolidation for a full system view.
- Map Relationships: Visualize stakeholder connections to understand roles and streamline communication.
- Organize Stakeholder Data: Document calls, store notes in structured folders, and build virtual or physical maps for quick reference and decision-making.





Key Take-Aways

- Legislative Challenges
- Involving Operations in Plan Writing
- Creating an Implementation Framework
- Build Partnerships and Relationships
- Build Forward-Thinking Datasets
- Map everything out – people and material
- Give yourself enough time to scale successfully





**Thank you
for your time!**

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Q&A Period

Your Feedback Matters

