



Via: minister.mecp@ontario.ca

Honorable Todd McCarthy

Subject: Request for Review of Extended Producer Responsibility for One-Pound Single-Use Propane Cylinders

Dear Sir,

I am writing to request that the Ministry of the Environment, Conservation and Parks and the Resource Productivity & Recovery Authority (RPRA) undertake a review of the current regulatory framework governing one-pound single-use propane cylinders sold in Ontario.

Consumers purchasing these cylinders pay environmental stewardship or producer responsibility costs at the point of sale with the expectation that an appropriate end-of-life management system exists. In practice, however, accessible return and recycling opportunities for these cylinders are extremely limited across many parts of the province. Most retail locations that sell the cylinders do not accept them back, and consumers are often left with few or no practical disposal options.

As a result, municipalities have become the default managers of these products. Municipal waste facilities bear the responsibility, cost, and safety risks associated with collecting, storing, and managing these pressurized cylinders despite not being the producers or distributors of the product. Improper disposal also creates significant operational hazards at material recovery facilities, transfer stations, and landfills, including the risk of fires and equipment damage.

This situation appears inconsistent with the principles of Extended Producer Responsibility (EPR), which are intended to shift the financial and operational responsibility for post-consumer products from municipalities and taxpayers to producers. When consumers contribute to environmental handling costs at the time of purchase, there should be a convenient, accessible, and effective collection system available to ensure the product is managed responsibly at the end of its useful life.

I respectfully request that the Ministry and RPRA review the current requirements applicable to one-pound propane cylinders and consider the following:

- Assess whether the existing producer responsibility system provides sufficient and accessible return opportunities for consumers throughout Ontario.
- Evaluate whether the fees collected from consumers are being used to establish an effective province-wide collection and recycling network.





- Require producers and retailers to provide convenient and publicly accessible take-back locations wherever these products are sold.
- Review whether municipalities are being unfairly burdened with the costs and liabilities associated with managing these products.
- Consider regulatory amendments to strengthen producer accountability and ensure the objectives of Ontario's circular economy and waste diversion policies are being achieved.

Municipalities should not be left to absorb the financial costs, operational challenges, and public safety risks associated with products for which producers have collected environmental stewardship fees. A well-functioning producer responsibility system should ensure that consumers have practical disposal options and that municipalities are not forced to subsidize the end-of-life management of these products.

I appreciate your consideration of this matter and would welcome the opportunity to discuss this issue further or provide examples of the challenges municipalities continue to face regarding the management of one-pound propane cylinders.

Thank you for your attention to this important issue.

Sincerely,

Nancy Carrol
CAO/Clerk-Treasurer
Tudor and Cashel Township

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All municipalities

