

Report to Civic Works Committee

To: Chair and Members
Civic Works Committee

From: Kelly Scherr, P.Eng., MBA, FEC
Deputy City Manager, Environment & Infrastructure

Subject: Updates: Blue Box Transition and Next Steps

Date: June 21, 2022

Recommendation

That, on the recommendation of the Deputy City Manager, Environment & Infrastructure, the following actions be taken with respect to the Blue Box transition process:

- a) the proposed by-law attached as Appendix "A" being "A by-law to authorize the Deputy City Manager, Environment & Infrastructure to respond to requests for proposals, negotiate and enter into any new service agreements or amending existing City of London service agreements with any Producer Responsibility Organization(s) ("PRO") registered with the Resource Productivity Recovery Authority, and/or their designate", **BE INTRODUCED** at the Municipal Council meeting to be held on July 5, 2022.
- b) Civic Administration **BE DIRECTED** to report back at a future Civic Works Committee with the outcome of negotiations and any executed contract(s) that occur with registered Producer Responsibility Organizations and/or their designate pursuant to a) above;
- c) the Deputy City Manager, Environment & Infrastructure and/or designate **BE DIRECTED** to enter into discussions with the Producer Responsibility Organization responsible for London and area and/or their designate, on their potential interest in using any of the City of London's recycling related infrastructure and assets in particular the City-owned Material Recovery Facility during the transition phase (July 1, 2023 to December 31, 2025) and post-transition phase (2026 and beyond) for operational efficiency purposes, economic opportunities, job creation opportunities, and how costs associated with existing capital and new capital investment would be paid, leased and/or shared; and
- d) Civic Administration **BE DIRECTED** to report back at a future Civic Works Committee with the next steps for City of London's Blue Box related infrastructure and assets in particular the City-owned Material Recovery pursuant to c) above.

Executive Summary

Blue Box transition from the existing shared responsibility model into a producer-led responsibility model, often referred to as "full" or "extended producer responsibility - EPR" will begin in London and area starting July 1, 2023 along with several other areas of Ontario.

On June 3, 2021, the Province of Ontario adopted Ontario Regulation 391/21: Blue Box, which stipulated the transition timeline and schedule, designated materials, eligible and non-eligible sources, management targets, and detailed the transition of the Blue Box Program to producers. Subsequently, this Regulation was amended with Ontario Regulation 349/22: Blue Box on April 14, 2022.

The transition to EPR will occur in two phases in Ontario:

- The transition phase: July 1, 2023 - December 31, 2025; and
- The post-transition phase: January 1, 2026 onwards.

During the transition phase, approximately 30 per cent of Ontario municipalities and First Nations communities will transition in each of the three (3) transition years. The Regulation states that current municipal Blue Box Programs and service levels must be maintained throughout the transition phase. Program changes are only permitted once producers have complete control over all Blue Box Programs across Ontario and the province-wide system is operational in the post-transition phase (starting January 1, 2026).

City staff and Municipal Council have been very active over the years with respect to moving Blue Box recycling to EPR. The most recent action by Municipal Council was passed on June 2, 2020.

More operational details of the future Blue Box Program are becoming available from industry. The most recent details were released on June 7, 2022 (Request for Proposals for the Establishment and Operating of Receiving Facilities for Blue Box materials) and have submission date of July 29, 2022. The challenge that is arising is negotiating a commercial agreement or agreements with several services and service arrangements in a short period of time. City staff is prepared for negotiations and ultimately, transition.

To be able to negotiate with PROs on behalf of Municipal Council, the Deputy City Manager, Environment & Infrastructure would require delegated authority to respond to requests for proposals, negotiate and enter into new or amending City of London agreements necessary to ensure the City's ability to continue recycling operations from July 1, 2023 to December 31, 2025 and post-transition phase (2026 and beyond).

The implementation of the Blue Box transition will eventually save London taxpayers money. Preliminary estimates suggest that between \$500,000 and eventually more than \$4 million per year in 2026 will be saved. The actual amount will be determined in the negotiations with industry and how the transition process unfolds (e.g., what happens with existing contracts, how will costs be paid, what conditions will be part of future agreements, how inflations will be handled, etc.).

Linkage to the Corporate Strategic Plan

Municipal Council continues to recognize the importance of waste management and the need for a more sustainable and resilient city in the development of its 2019-2023 Strategic Plan for the City of London. Specifically, London's efforts in waste management address the three following areas of focus: Building a Sustainable City; Growing our Economy; and Leading in Public Service.

On April 23, 2019, the following was approved by Municipal Council with respect to climate change:

Therefore, a climate emergency be declared by the City of London for the purposes of naming, framing, and deepening our commitment to protecting our economy, our eco systems, and our community from climate change.

On April 12, 2022, Municipal Council approved the Climate Emergency Action Plan which includes Area of Focus 5, Transforming Consumption and Waste as Part of the Circular Economy.

Analysis

1.0 Background Information

1.1 Previous Reports Related to this Matter

Relevant reports that can be found at www.london.ca under Council meetings include:

- Comments on Environmental Registry of Ontario (ERO): Proposed Blue Box Regulation (November 17, 2020 meeting of Civic Works Committee (CWC), Item #2.1)

- Contract for the Operation of the City's Materials Recovery Facility – Single Source (July 14, 2020 meeting of CWC, Item #2.3)
- Response to the Association of Municipalities of Ontario (AMO) Regarding Transition of Recycling (May 26, 2020 meeting of CWC, Item #2.4)
- Operation of the City's Materials Recovery Facility: Next Steps in the Transition to Industry Responsibility for Recycling Services (April 15, 2020 meeting of CWC, Item #2.8)
- Award of Contract (Request for Proposals 19-02) – Recycling Collection (City-wide) and Garbage and Yard Waste Collection in a Portion of London (August 12, 2019 meeting of CWC, Item #2.4)
- Additional Short-Term Contract Amendment for Recycling Services (May 14, 2019 meeting of CWC, Item #2.9)
- Comments on Environmental Registry of Ontario (ERO): Reducing Litter and Waste in our Communities: Discussion Paper (April 16, 2019 meeting of CWC, Item #2.14)
- Request for Comments on the Draft Amended Blue Box Programs Plan (Prepared by Stewardship Ontario) (January 9, 2018 meeting of the CWC, Item #9)

1.2 Background

The *Resource Recovery and Circular Economy Act, 2016* and the *Waste Diversion Transition Act, 2016*, authorize the transition of the financial and operational responsibility for managing designated packaging, paper and packaging-like products from municipalities to the producers of such products and packaging. This transition changes the existing shared responsibility model for the Blue Box Program into a producer-led responsibility model, often referred to as "full" or "extended producer responsibility".

On June 3, 2021, the Province of Ontario adopted Ontario Regulation 391/21: Blue Box, which stipulated the transition timeline and schedule, designated materials, eligible and non-eligible sources, management targets, and detailed the transition of the Blue Box Program to producers. Subsequently, this Regulation was amended with Ontario Regulation 349/22: Blue Box on April 14, 2022.

Transition Phase and Post-Transition Phase

As a municipality transitions its Blue Box Program, the majority of financial and operational responsibility for the end-of-life management of their eligible paper, packaging, and packaging-like materials (e.g., aluminum foil, paper bag, beverage cup, etc.) designated materials will transition to producers. Currently, producers pay approximately 50 per cent of the cost. In the future this amount will be over 90 percent of the existing system.

The transition to Extended Producer Responsibility will occur in two phases:

- The transition phase: July 1, 2023 - December 31, 2025; and
- The post-transition phase: January 1, 2026 onwards.

During the transition phase, approximately 30 per cent of Ontario municipalities and First Nations communities will transition in each of the three (3) transition years. The Regulation states that current municipal Blue Box Programs and service levels must be maintained throughout the transition phase. Program changes are only permitted once producers have complete control over all Blue Box Programs across Ontario and the province-wide system is operational in the post-transition phase (starting January 1, 2026).

Producer Responsibility Organizations

Obligated producers of designated packaging, paper and packaging-like products can retain the services of a Producer Responsibility Organization (PRO) to discharge their obligations under the Regulation, including collection, processing, promotion and education, and achieving management targets. PROs will decide how to meet their

regulatory obligations by either tendering or negotiating for service provision with municipalities or private firms.

To be recognized as a producer service organization, a PRO must represent at least one producer and be registered with the Resource Productivity and Recovery Authority (RPRA). The following four PROs are currently registered with the Authority:

- Canadian Beverage Container Recycling Association
- Circular Materials Ontario
- Resource Recovery Alliance
- Ryse Solutions Ontario Inc.

1.3 Current Municipal Council Direction

City staff and Municipal Council have been very active over the years with respect to moving recycling to a model known as “extended producer responsibility” (with variations on the model title such as producer responsibility or individual producer responsibility). The most recent action by Municipal Council was on June 2, 2020 when Council passed the following motion:

That on the recommendation of the Managing Director, Environmental & Engineering Services and City Engineer, the following actions **BE TAKEN** with respect to a request by the Association of Municipalities of Ontario (AMO) for details on recycling transition:

- a) The Mayor **BE AUTHORIZED** to advise the Ontario Ministry of the Environment, Conservation and Parks (MECP) and the Association of Municipalities of Ontario (AMO) that the Corporation of the City of London would like to:
 - i. transition the collection of recyclables to full producer responsibility on January 1, 2023, and;
 - ii. examine opportunities of working with producers (industry) during the transition period (e.g., fee for services basis for recycling such as administration, education and awareness, contract management, monitoring and compliance);

It being noted that the Mayor has previously been authorized to advise MECP and AMO that the transition of processing and marketing of recyclables to full producer responsibility could occur on January 1, 2023.

- b) Staff **BE DIRECTED** to undertake the following actions as part of the transition process:
 - i. continue to take an active role in the development of the regulatory environment and implementation plans of the transition process through the Municipal 3Rs Collaborative (M3RCs) which is comprised of the AMO, Regional Public Works Commissioners of Ontario, Municipal Waste Association and the City of Toronto;
 - ii. ensure that producers (industry) are aware that an existing competitively awarded contract to collect recyclables is currently in place in London, and that opportunities to use the existing contractor (Miller Waste Systems) with mutually agreeable transition contract terms should be considered from January 1, 2023 to December 21, 2025, it being noted that this would further benefit London taxpayers as early contract termination fees could be reduced;
 - iii. ensure that the producers’ plan to transition residents, Municipal Elected Officials and City staff to the new system is accountable and transparent

and also includes separate contingency plans developed by the City, and;

- iv. ensure that producers are aware that opportunities to increase waste diversion, maximize resource recovery and optimize recycling system operations can be examined through the London Waste to Resources Innovation Centre and its business and academic collaborators for the benefit of all in Ontario and elsewhere.

1.4 Current City Staff Involvement

City staff are grateful for the work undertaken and shared by the Association of Municipalities of Ontario (AMO), Regional Public Works Commissioners of Ontario (RPWCO), Municipal Waste Association (MWA) and the City of Toronto acting as one entity called the Municipal 3Rs Collaborative (M3RCs).

City staff are active members of M3RCs via RPWCO including being co-chair of the RPWCO Waste Subcommittee. City staff also participate with MWA. London Municipal Council has a representative on the AMO Board of Directors.

City staff are also very involved with the Ontario Waste Management Association (OWMA) and are grateful for the work undertaken and shared on behalf of the membership which represents over 60 municipalities and 190 companies and organizations in the private sectors that manage 85% of Ontario's waste streams.

Staff continue to be active members of the Continuous Improvement Fund (CIF) and M3RCs Transition Working Group and several of its five (5) subcommittees, including: Contracts, Collections and Communications and Post Collection (processing). With municipal representation from across the province, the Working Group and subcommittees have provided a very useful platform for information-sharing and the creation of transition supports, such as promotion and education materials, potential terms and conditions for commercial agreements, and aggregated data analysis and reports.

The City of Ottawa and the City of Toronto are also transitioning their Blue Box Programs to producers on July 1, 2023. These represent the three largest municipalities in the first transition group. A working group between these three cities is being used to share information, lessons learned, and to determine areas of alignment. While it is recognized there are unique challenges and regional differences between these three cities, there is alignment on certain guiding principles and positions.

1.5 Recent Interactions with Producer Responsibility Organizations

City staff have submitted information, responded to questions and/or held discussions directly or indirectly with PROs to provide an overview of London's Blue Box (generally curbside collection) and Blue Cart (generally multi-residential, high-rise buildings) Program to educate them on program elements and the relationship with other services (e.g., multi-materials drop off depots known as EnviroDepots).

City staff have expressed the desire to discuss the City of London being a potential service administrator for some or all aspects of the Blue Box and Blue Cart Program during the transition years, subject to terms and conditions that can be mutually agreed upon. In addition, the role of the City-owned Material Recovery Facility (MRF) located on Manning Drive will be an important part of the discussions and negotiations.

The following potential services currently being offered by City staff, or under contract to the City of London, could be sought by PROs in London:

- Managing Blue Box and Blue Cart collection services;
- Managing collection services for other eligible sources;
- Providing customer service support to residents through Service London;

- Providing promotion and education services to residents through the transition phase and beyond;
- Managing Blue Box and Blue Cart container assets;
- Monitoring and implementing contamination abatement protocols;
- Implementing Blue Box pilot project opportunities; and
- Negotiating access to the City's recycling assets and infrastructure.

Given the time constraints of transitioning London's Blue Box and Blue Cart Program by July 1, 2023, PROs may have challenges in procuring services and enough assets to service a city the size of London along with a number of neighbouring municipalities. London is well positioned to help a PRO during the transition period as it has been offering these services for 30 years.

2.0 Discussion and Considerations

2.1 City of London's Role During the Transition Phase

While producers are required to maintain all existing Blue Box service levels currently being provided to eligible sources throughout the transition phase, producers have complete autonomy to determine which service provider will manage the designated materials on their behalf, including contracting with a municipality and/or a private waste management firm.

Municipalities do not have the option to choose which PRO or PROs will take over management responsibilities for delivering Blue Box recycling services to eligible sources. The PROs will determine among themselves which PRO or PROs are delegated to provide Blue Box services and they in turn will decide what role the City of London will play, if any, in the delivery of recycling services as of July 1, 2023.

To ensure a smooth transition and limit impacts to residents at the curb, City staff are recommending to Municipal Council that Environment & Infrastructure negotiate with PROs for the continued provision of all Blue Box management activities and services on their behalf during the transition phase and post transition phases.

With a transition date of July 1, 2023, there is a lot of work to undertake to ensure a smooth transition. Fortunately, City staff have been preparing for several years now as highlighted in several update reports to CWC. City staff continue proactively planning for potential transition scenarios so that the City is in a position to negotiate with its assigned PRO(s) effectively and efficiently.

2.2 Preparing to Negotiate Blue Box Related Contract(s)

During commercial negotiations with London's PRO(s), City staff anticipate negotiating a contract that encompasses several service areas, including:

- Uninterrupted curbside collection from existing single-family households and multi-residential buildings currently served by the City (under contract);
- The shift from 42 recycling pickups per year to weekly Blue Box curbside service. It is important to note that this may be viewed as a service enhancement and not eligible in the Transition period (July 1, 2023 to December 31, 2025) to be reimbursed;
- Residential units above commercial locations that are currently served through public space bins (e.g., downtown London);
- Public and parks space collection (i.e., both eligible and non-eligible sources);
- Non-eligible sources such as small businesses, places of worship, shelters, etc. currently collected on residential recycling routes;
- Customer service through Service London;
- Promotion and education (e.g., posters, information guides, direct mail, advertising, integration of messaging into waste diversion and environmental outreach programs, etc.);

- City-owned curbside collection Blue Boxes; and
- Use of the MRF including a different arrangement such as leasing, sale of asset, etc.

Staff have been gathering contractual and in-house service data to support negotiations with PROs. Information gathered includes, but is not limited to: contract details, financial impacts, staff impacts, service level details, budget implications, information and technology impacts, integration with and/or impact to other service areas, and terms and conditions.

2.3 Management of Recyclables from Non-Eligible Sources

Both during transition and after transition there are locations that producers are not responsible for with respect to the management of recyclables. These non-eligible sources include municipal facilities such as community centres, libraries, arenas, and civic centres, non-residential locations such as shelters and places of worship, and industrial, commercial and institutional establishments.

The City services approximately 600 to 700 non-eligible customers comprised of small businesses on residential recycling routes, City facilities, place of worship, shelters, charities. As these locations are not designated in the Regulation, the City will not receive financial compensation for the continued provision of recycling collection services to these non-eligible sources.

The management of these materials will be discussed during negotiations with PROs to determine whether the economies of scale can be leveraged as part of any negotiations.

2.4 Requesting Delegated Authority, Responding to Requests for Proposals Entering Negotiations

More operational details of the future Blue Box Program are becoming available from industry. The most recent details were released on June 7, 2022 (Request for Proposals for the Establishment and Operating of Receiving Facilities for Blue Box materials) and have submission date of July 29, 2022. The challenge that is arising is negotiating a commercial agreement or agreements with several services and service arrangements in a short period of time. City staff is prepared for negotiations and ultimately, transition.

To be able to negotiate with PROs on behalf of Municipal Council, the Deputy City Manager, Environment & Infrastructure would require delegated authority to respond to requests for proposals, negotiate and enter into new or amending City of London agreements necessary to ensure the City's ability to continue recycling operations from July 1, 2023 to December 31, 2025 and post-transition phase (2026 and beyond). Delegated authority to negotiate is being requested for:

- Blue Box collection services contract that was approved by Municipal Council in August 2019;
- Blue Box administrative services for the management of Blue Box materials;
- Management of Blue Box materials from locations not serviced by PROs; and
- Blue Box related infrastructure and assets in particular the City-owned MRF for operational efficiency purposes, economic opportunities, job creation opportunities, and how costs associated with existing capital and new capital investment would be paid, leased and/or shared. The current service agreement at the MRF was approved by Municipal Council in July 2020.

City staff will report back to CWC in early 2023 and detail the outcome of negotiations and the resulting executed agreement(s) and/or next steps with its PRO including the City's future role in the system during the transition years and post-transition. The report will also include a more detailed analysis of the City's transition to the new recycling system and the financial and other benefits that will accrue.

3.0 Financial Impact/Considerations

The implementation of the Blue Box transition will eventually save London taxpayers money. Transitioning the costs and operating responsibility of the recycling program away from municipal taxpayers by making the producers of products and packaging responsible for costs will mean savings. Preliminary estimates suggest that between \$500,000 and eventually more than \$4 million per year (in 2026) will be saved.

The actual amount will be determined in the negotiations with industry and how the transition process unfolds (e.g., what happens with existing contracts, how will costs be paid, what conditions will be part of future agreements, how inflations will be handled, etc.). The July 1, 2023 start date means that additional payments from industry in 2023 will be about half of a normal year. These details will be provided in a future CWC report in late 2022 or early 2023.

Conclusion

Based on past reporting to CWC, discussion and direction from Municipal Council, City staff are prepared for the next steps in the Blue Box transition process as per the *Resource Recovery and Circular Economy Act, 2016*, the *Waste Diversion Transition Act, 2016* and Ontario Regulations 391/21: Blue Box and 349/22: Blue Box which stipulates the transition timeline and schedule, designated materials, eligible and non-eligible sources, management targets, and the detailed the transition of the Blue Box Program to producers.

The City of London will transition in the first group of municipalities starting July 1, 2023. In the next year, a number of discussions and negotiations will occur with the PRO or PROs serving London and area to ensure that it is a smooth transition for the residents of London.

Prepared by: **Jessica Favalaro, B.Sc.**
Manager, Waste Diversion Programs, Waste Management

Kevin Springer
Manager, Waste Collection

Mike Losee, B.Sc.
Division Manager, Waste Management

Prepared and Submitted by: **Jay Stanford, M.A., M.P.A.**
Director, Climate Change, Environment & Waste Management

Recommended by: **Kelly Scherr, P. Eng., MBA, FEC**
Deputy City Manager, Environment & Infrastructure

c Anna Lisa Barbon, Deputy City Manager, Finance Supports
Barry Card, Deputy City Manager, Legal Services

Appendix A A by-law to authorize the Deputy City Manager, Environment & Infrastructure to respond to requests for proposals, negotiate and enter into any new service agreements or amending existing City of London service agreements with any Producer Responsibility Organization(s) registered with the Resource Productivity Recovery Authority, and/or their designate

Appendix “A”

Bill No.
2022

By-law No. A.-

A by-law to authorize the Deputy City Manager, Environment & Infrastructure to respond to requests for proposals, negotiate and enter into any new service agreements or amending existing City of London service agreements with any Producer Responsibility Organization(s) registered with the Resource Productivity Recovery Authority, and/or their designate”;

WHEREAS subsection 5(3) of the *Municipal Act, 2001*, S.O. 2001, c.25, as amended, provides that a municipal power shall be exercised by by-law;

AND WHEREAS section 9 of the *Municipal Act, 2001* provides that a municipality has the capacity, rights, powers and privileges of a natural person for the purpose of exercising its authority under this or any other Act;

AND WHEREAS section 10 of the *Municipal Act, 2001* provides that (1) a municipality may provide any service or thing that the municipality considers necessary or desirable for the public, and (2) that a municipality may pass by-laws respecting: 5. Economic, social and environmental well-being of the municipality, including respecting climate change; 6. Health, safety and well-being of persons; 7. Services and things the municipality is authorized to provide under subsection (1); 8. Protection of persons and property;

AND WHEREAS the Province of Ontario passed the *Resource Recovery and Circular Economy Act, 2016* and the *Waste Diversion Transition Act, 2016*, that authorized the transition of the financial and operational responsibility for managing designated packaging, paper and packaging-like products from municipalities to the producers of such products and packaging;

AND WHEREAS the Province of Ontario on June 3, 2021, adopted Ontario Regulation 391/21: Blue Box, which stipulated the transition timeline and schedule, designated materials, eligible and non-eligible sources, management targets, and detailed the transition of the Blue Box Program to producers. Subsequently, this Regulation was amended with Ontario Regulation 349/22: Blue Box on April 14, 2022;

AND WHEREAS the Resource Productivity and Recovery Authority is the regulator mandated by the Province of Ontario to enforce the province’s circular economy laws. Established in November 2016 to support the transition to a waste-free Ontario, the Authority administers the *Resource Recovery and Circular Economy Act, 2016* and the *Waste Diversion Transition Act, 2016*, and their associated regulations;

AND WHEREAS a producer responsibility organization, or PRO, is a business established to contract with producers to provide collection, management and administrative services to help producers meet their regulatory obligations under the Blue Box Regulation, including; arranging, establishing or operating a collection or management system; arranging, establishing or operating promotion and education system; preparing and submitting reports; and representing a producer for any purpose under the regulation. A producer responsibility organization must register with the Resource Productivity and Recovery Authority;

AND WHEREAS sections 9 and 10 and 23.1 through 23.5 of the Municipal Act, 2001 authorize a municipality to delegate its powers and duties under this or any other Act to a person or body;

AND WHEREAS section 23.1 of the *Municipal Act, 2001* enables a municipality to delegate certain powers and duties any Act, to a person or body, subject to restrictions set out in the *Municipal Act, 2001*;

AND WHEREAS nothing in subsection 23.1 of the *Municipal Act, 2001* restricts a municipality from delegating its administrative powers;

AND WHEREAS the Municipal Council has adopted a “Delegation of Powers and Duties Policy” for establishing guidelines to consider when delegating its powers and duties to a person;

NOW THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1. The Deputy City Manager, Environment & Infrastructure, or designate, is hereby delegated the power to respond to requests for proposals, negotiate and enter into any new service agreements or amend existing City of London service agreements with any Producer Responsibility Organization(s) registered with the Resource Productivity Recovery Authority, and/or their designate.
2. The authority of the Deputy City Manager, Environment & Infrastructure to act under section 1 of this by-law, is subject to the following:
 - i. such actions and agreements are consistent with the current Blue Box collection contract approved by Municipal Council in August 27, 2019 and the current Blue Box processing contract approved by Municipal Council in July 21, 2020;
 - ii. such actions and agreements shall be for the purposes of facilitating an orderly transition of the City’s recycling operations in a manner consistent with O. Reg. 391/21 and O. Reg. 349/22: Blue Box;
 - iii. such actions and agreements are acceptable to the Deputy City Manager, Finance Supports;
 - iv. such agreements are in a form satisfactory to the Deputy City Manager, Legal Services;
 - v. such actions and agreements do not require additional funding or are provided for in the City’s current budget;
 - vi. such actions or agreements do not contain any financial arrangement, guarantee, indemnity or similar commitment that would increase, directly or indirectly, the indebtedness or contingent liabilities of The Corporation of the City of London; and
 - vii. this delegation shall not supersede the applicability of any contract approval requirements contained in the City’s Procurement of Goods and Services Policy.
3. The powers delegated in section 1 above may be exercised by both the delegate and the municipality.
4. This by-law shall come into force and effect on the day it is passed.

PASSED in Open Council on July 5, 2022

Ed Holder
Mayor

Michael Schulthess
City Clerk

First Reading – July 5, 2022
Second Reading – July 5, 2022
Third Reading – July 5, 2022