

Blue Box Program Wind-up Plan: Revised Fee Setting Methodology Addendum

Consultation Report

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Introduction and context

Between January 21 and February 4, 2022, the Resource Productivity and Recovery Authority (RPRA) consulted on Stewardship Ontario's proposal to simplify the fee-setting methodology for Blue Box Program stewards during the program's transition period between 2023-2025.

Prior to RPRA's consultation. Stewardship Ontario consulted stakeholders from December 1. 2021 to January 13, 2022 on the proposal. Based on the supportive feedback it received during its consultation, Stewardship Ontario submitted its recommendation to RPRA to amend the Blue Box Program Transition Plan in order to implement the revised fee-setting methodology.

All feedback received during both Stewardship Ontario and RPRA's consultation was considered by RPRA in reviewing and approving with conditions the proposed addendum. RPRA approved the Blue Box Program Transition Plan: Revised Fee Setting Methodology for 2023-2025 Addendum on February 17, 2022, and stakeholders were notified on March 2, 2022. In approving the addendum, RPRA assessed whether it was compliant with requirements in the Waste Diversion Transition Act, 2016 (WDTA) and the Minister's directions and consistent with RPRA's Wind-Up Guide.

This report details RPRA's consultation process, the feedback received and how RPRA incorporated the feedback into approving with conditions the addendum. Questions about this report can be emailed to consultations@rpra.ca.

About the Revised Fee Setting Methodology Addendum

On August 15, 2019, the Minister of the Environment, Conservation and Parks issued direction to Stewardship Ontario and RPRA to wind up the Blue Box Program and transition it to Ontario's new producer responsibility framework starting on July 1, 2023, through to December 31, 2025.

In December 2020, RPRA approved Stewardship Ontario's Blue Box Program Transition and Stewardship Ontario Wind-up Plan, with conditions, as well as the Continuous Improvement Fund's (CIF) wind-up plan, which was included by reference in Stewardship Ontario's plan.

In October 2021, Stewardship Ontario initially advised the steward community of its intention to introduce a proposal to simplify its steward fee-setting methodology for the 2023 to 2025 Blue Box Program transition period. The revised fee-setting methodology would eliminate the need for stewards to report supply-to-market data to Stewardship Ontario starting this year with the 2022 reporting cycle (for 2023 invoices) through to the end of the Blue Box Program transition period on December 31, 2025.

From December 1, 2021, to January 13, 2022, Stewardship Ontario consulted stakeholders on the proposal. Following the consultation period, on January 19, 2022, Stewardship Ontario submitted its recommendation to RPRA to amend the Blue Box Program Transition Plan to include the revised the fee-setting methodology.

Stewardship Ontario Consultation

Stewardship Ontario received feedback from stakeholders during a webinar presentation, through an online survey, and written comments. The stakeholders expressed broad support for the proposal. Examples of feedback include:

 One stakeholder representing a large percentage of stewards supported the proposal because of the proposal's benefit of not having to report commercially sensitive data to

- Stewardship Ontario's service provider and the reduction in administrative burden by eliminating reporting requirements to Stewardship Ontario.
- A major industry association expressed strong support for the proposal noting the predictability and simplicity of calculating fees using the revised methodology, reducing duplication in reporting currently required under the old Blue Box Program and new Blue Box Program.
- A stakeholder representing a key material category in the Blue Box Program strongly supported the proposal and noted the burden reduction by eliminating supply reporting and risk reduction associated with not reporting commercially sensitive data to an external party providing services to Stewardship Ontario.
- Many stakeholders expressed strong support for the principle of reducing administrative burden. Concerns received by Stewardship Ontario included issues affecting individual stewards' operations, and recommendations to account for changes in individual steward fees due to divestment or acquisition of business.

For Stewardship Ontario's Consultation Report, please see Appendix B.

About RPRA

RPRA is the regulator created by the Ontario government to enforce the requirements of the Resource Recovery and Circular Economy Act, 2016 (RRCEA) and the Waste Diversion Transition Act, 2016 (WTDA).

The RRCEA establishes a new resource management regime where producers are individually responsible and accountable for their products and packaging, recovering resources and reducing waste. The WDTA allows for the continuation of waste diversion programs and sets out provisions to wind up those programs as directed by the Minister of the Environment, Conservation and Parks.

Principles for public consultation

RPRA's consultations are guided by the following best practice principles developed by the Organization for Economic Cooperation and Development:

Inclusiveness and openness: Engage broadly with a wide variety of stakeholders, provide clear and understandable information, and make the consultation process accessible, comprehensible and responsive.

Timeliness: Engage stakeholders early before decisions are made and provide regular opportunities for engagement on key program and policy matters.

Accessible and cost effective: Consider a variety of tools and methods to gather feedback that promote efficient and cost-effective consultations.

Balance: Provide opportunities for diverse perspectives and opinions to be heard and considered.

Transparent: Record feedback, report back a summary to stakeholders, and synthesize feedback into programs and policies as appropriate.

Evaluation: Demonstrate the impact of public consultations on program delivery and policy development.

Consultation

Process

RPRA's consultation on Stewardship Ontario's revised fee-setting methodology began January 21, 2022. A dedicated web page was created on RPRA's website with background information on the consultation and how to provide feedback.

On January 21, RPRA emailed its general mailing list (approximately 1900 subscribers) announcing the consultation period and how to submit feedback. On January 24, RPRA notified Datacall participants (municipalities, First Nation communities and recycling associations) by email, and Stewardship Ontario notified their list of stewards on the same day. Additionally, a reminder was included in RPRA's February newsletter.

Stakeholders were invited to submit their feedback by email until February 4, 2022, which marked the end of the consultation period.

What we heard

RPRA received twelve written submissions and conducted one virtual meeting with stakeholders during the consultation period. Based on the consultation undertaken by Stewardship Ontario and RPRA, the proposal received broad support. The primary concern raised during the consultation was related to the implication for program performance reporting due to the loss of steward supply-to-market data.

See below for a summary of comments received. For the list of stakeholders that submitted written feedback, please see Appendix A.

Support:

- Five stakeholders that provided feedback were in full support. Reasons for supporting the revised methodology include greater predictability in fee setting, eliminating the duplication and complexity of reporting requirements for producers, and finding operational efficiencies for Stewardship Ontario throughout the transition period.
- Stakeholders expressed support for removing the requirement to report commercially sensitive data to Stewardship Ontario's service provider.
- One stakeholder supported the proposal and strongly supported the proposed approach to engage with municipalities and CIF to revitalize a waste characterization program to ensure accurate reporting of program performance data and to capture the changing material composition of the Blue Box Program. The stakeholder also encouraged Stewardship Ontario to continue calculating material-specific recovery rates as this information is used by stewards for planning and continuous improvement.

Concerns:

- Some stakeholders expressed concerns about the lack of details around the proposed waste characterization studies that would be required to continue performance reporting.
- Several stakeholders do not support the proposal because it doesn't account for fluctuations in volumes year-over-year.
- Several stakeholders commented on the lack of information and time for stewards to make an informed decision.

- Several stakeholders expressed doubts about Stewardship Ontario's claim that the revised fee-setting methodology would reduce administrative burden due to other reporting requirements (e.g., reporting to Stewardship Ontario in other provinces, reporting to RPRA, etc.).
- Several stakeholders expressed concerns the methodology would advantage some stewards while disadvantaging others (e.g., lack of consideration for differing impacts of COVID-19 or other unforeseen circumstances on business, stewards experiencing growth will benefit more, etc.).
- Several stakeholders expressed concerns about the loss of precision in the calculation of fees (e.g., reporting errors from previous years won't be caught).
- Several stakeholders noted that the revised methodology could have environmental implications by potentially disincentivizing stewards from making 'good' packaging decisions.
- One stakeholder raised concerns that Stewardship Ontario is basing its recommendation to RPRA to approve the proposal based on a small percentage of stewards who participated in Stewardship Ontario's consultation.
- o One stakeholder expressed concerns with the lost opportunity to evaluate costs of the old program with the new program during transition.
- One stakeholder noted their concern that the methodology is still based on waste characterization studies that aren't publicly available. Stakeholder asked for more transparency in the fee-setting process, calling on RPRA to do so in their fee setting going forward as well.
- One stakeholder expressed their concern that municipalities of all sizes need to continue to be involved in the consultation and decision-making process.

Conclusion

RPRA considered all stakeholder feedback obtained through both Stewardship Ontario's and RPRA's consultations as it reviewed Stewardship Ontario's proposed addendum to implement a revised steward fee-setting methodology during the Blue Box Program transition period.

To address concerns about program performance evaluation due to the loss of steward supplyto-market reporting, which was the primary concern raised during the consultations, RPRA approved the Blue Box Program Transition Plan: Revised Fee Setting Methodology for 2023-2025 Addendum on February 17, 2022, with conditions.

Those conditions require Stewardship Ontario to provide a comprehensive plan for determining the recovery rate of the Blue Box Program through to the transition of the program in 2025. The plan must be provided to the Authority prior to the elimination of steward supply-to-market data reporting to Stewardship Ontario. For more details on the conditions, view the approval letter.

Appendix A: Stakeholders that submitted feedback

The twelve written submissions were submitted by the following stakeholders:

- Association of Municipalities of Ontario, City of Toronto, Regional Public Works Commissioners of Ontario and the Municipal Waste Association
- Best Buy Canada
- Carton Council Canada
- City of Hamilton
- Coty Canada
- Cycle Environment
- David McRobert, LL.B., MES, B.SC.
- Electronics Product Stewardship Canada
- Food and Health Consumer Products
- Loblaws
- Retail Council of Canada
- Wawanesa Insurance

Appendix B: Stewardship Ontario Consultation Report

[See next page]



Blue Box Transition Plan

Proposal for Simplified Approach to Fee Setting

Consultation Report

January 2022



BLUE BOX TRANSITION PLAN SIMPLIFIED APPROACH TO FEE SETTING CONSULTATION REPORT

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1. INTRODUCTION

Stewardship Ontario developed and proposed a Simplified Approach to Blue Box fee setting late in 2021 in recognition of the program's scheduled wind up and the challenges faced by producers/stewards in moving to Ontario's new regulatory framework for Blue Box recycling. The proposal sought to ease the administrative burden on businesses during the Blue Box transition period during which reports with slightly different information about supplied material would need to be submitted to Stewardship Ontario, the Resource Productivity & Recovery Authority (RPRA) and likely to their Producer Responsibility Organizations (PROs).

This report details the activities and efforts undertaken by Stewardship Ontario to inform and engage stakeholders about the Simplified Approach proposal. Along with gauging their support or opposition, it gathers issues raised by stakeholders for eliminating the need to report detailed supply-to-market data to Stewardship Ontario beginning in 2022 and for the years 2023-2025 while the program continues to operate.

2. STAKEHOLDER COMMUNICATIONAs detailed below, Stewardship Ontario distributed information about the proposed Simplified Approach to stakeholders via various channels beginning in the fall of 2021. All communications advised of the availability of more information and encouraged submissions of questions and feedback. Updates and information were reviewed by RPRA prior to posting or distribution.

2.1 Annual Steward Meeting

Stewards were initially advised of the Simplified Approach proposal on October 19, 2021, with initial information and guidance that further details would be reviewed during the online Annual Steward Meeting (ASM) on October 27, 2021 (the initial ASM invite was distributed in September, followed by two email reminders). Information about the proposal was also included in the Report to Stewards distributed prior to the ASM.

The ASM had 362 attendees and the Stewardship Ontario section of the webinar was presented by Executive Director Lyle Clarke. The presentation discussed how a review of business processes with a view to reducing costs had revealed the potential to eliminate the need for stewards to report Blue Box supply-to-market data to Stewardship Ontario. Stakeholders were advised that the proposal would not impact fees for the coming year and that further details would be provided. A Discussion Paper and Q&A document were distributed December 1.

2.2 Email Notifications

Email notifications were sent to stakeholders throughout the consultation. Email lists for "all" stakeholders included primary and secondary contacts for all organizations registered with the Blue Box program, as well as various trade and industry associations. RPRA reviewed emails and contacts were included in a distribution list.

Note that the number of emails sent fluctuates based on autoreply bounce backs. Stewardship Ontario ensures its stakeholder lists are up to date. Emails pointed to the Stewardship Ontario website and encouraged questions and feedback submissions to consultation@stewardshipontario.ca



| Date sent | Stakeholder group | Subject and link | Number sent to | Open rate |
|----------------------|----------------------|--|----------------|-----------|
| October 22, 2021 | All | 2021 Annual Steward Meeting Reminder-Report to Stewards Now Available | 3148 | 28% |
| December 1, 2021 | All | Proposed Amendment to the Blue Box Program Transition Plan Revised Fee Setting Methodology for 2023-2025 | 2815 | 28% |
| December 7, 2021 | All | Survey Available & Webinar Registration: Proposed Simplified Fee Setting for 2023-2025 | 2398 | 25% |
| December 21, 2021 | All | Reminder Survey & Webinar: Proposed Simplified Fee Setting for 2023-2025 | 2409 | 23% |
| January 4, 2022 | All | Reminder: Survey and Webinar Proposed Simplified Fee Setting | 2407 | 24% |
| January 7, 2022 | All | Proposed Simplified Approach To Fee Setting – Webinar Materials and Survey Available | 2405 | 21% |
| January 11, 2022 | All | Survey Reminder and Webinar Q&A Proposed Simplified Approach to Fee Setting | 2405 | 18% |

2.3 Website

The initial communication about the proposal was posted to the home page of the Stewardship Ontario website and continues to be available under Latest News:

• October 19, 2021: <u>Stewardship Ontario Proposes to Eliminate Need For Stewards to Report Supplyto-Market Data.</u>

All information, resources and updates about the Simplified Approach proposal were posted to the <u>Blue Box Program Transition</u> page on the Stewardship Ontario website, with some featured on the site's homepage. All emails pointed to the Blue Box page as a source for further information.

3. CONSULTATION APPROACH

Stakeholders were invited to provide their thoughts and questions about the Simplified Approach proposal via an online survey, through participation and questions during the January 6 webinar and through submissions to a dedicated email address.

3.1 Online Survey

The December 1 email advised stakeholders that a survey on the proposal was pending and the link to the online survey was provided in the December 7 email. The survey was hosted on the Alchemy platform (formerly SurveyGizmo) and provided respondents with a brief introduction and four questions:



As part of the Blue Box transition, Stewardship Ontario is proposing to eliminate the need for stewards to report supply-to-market data to Stewardship Ontario, reducing the administrative burden on stewards and program management costs.

- Have you reviewed the proposal Discussion Paper and Q&A document? (yes/no)
- Do you support or oppose the proposal? (5-point scale: strongly support to strongly oppose)
- Please provide any comments about the proposal (open text field)
- Please provide your email (validated text field)

Four survey reminders were sent, and webinar participants were advised that the survey was the easiest way to provide feedback on the proposal. The survey was closed on January 13, with responses from 105 fee-paying stewards. A list of survey respondent companies is included in Appendix A to this report.

The following summarizes survey responses from fee-paying stewards:

- 93% advised that they had reviewed the proposal Discussion Paper or Q&A document
- This table captures proposal support/opposition:

| Strongly support | 43.8% |
|--------------------|-------|
| Moderately support | 23.8% |
| Neutral | 14.3% |
| Moderately oppose | 8.6% |
| Strongly oppose | 9.5% |

• 45 respondents provided comments about the proposal.

3.2 Webinar

A total of 351 stakeholders registered for the webinar held on January 6, 2022, at 10 am ET. A total of 254 individuals attended the online event – the list of attendee organizations is included in Appendix A.

The one-hour webinar was hosted by Lyle Clark and the presentation included 27 slides with the following agenda:

- 1. Background and Context
- 2. Fee Simplification Explained
- 3. Next Steps.

The webinar presentation and recording were posted to the Stewardship Ontario website on January 7 and stakeholders were advised of their availability via email.

A total of 67 questions were submitted by attendees. Excluding queries for technical assistance and merging questions with similar themes, the final Q&A summary addressed 32 questions. The Q&A summary was posted on January 11 and stakeholders were advised of its availability via email. The Q&A summary grouped questions under the following categories:

- Calculating / Estimating The Fee
- Impact Of Covid On Fee Setting
- Entering / Exiting Stewards
- Divestitures / Acquisitions
- Ability To Opt Out



- Data Submissions
- Currently Exempt Stewards
- Free Riders
- Transition To Individual Producer Responsibility (Ipr)
- Expected Stewardship Ontario Cost Savings
- Packaging Reduction / Waste Reduction
- Recovery Rate Calculations / Waste Audits
- Miscellaneous
- Decision To Proceed
- Decision Timing

3.3 Email

A total of 23 stakeholders sent email to consultation@stewardshipontario.ca. The list of submitters is included in Appendix A.

Emails included seven formal submission letters from:

- Association of Municipalities of Ontario, City of Toronto, Regional Public Works Commissioners of Ontario and the Municipal Waste Association
- Region of Peel
- Carton Council Canada
- Cycle Environment
- Canadian Beverage Association
- Retail Council of Canada
- Food, Health and Consumer Products

The remaining emails primarily consisted of queries requesting further information about the proposal, consultation materials and specifics about how it would apply to their organization. Responses were sent to all stakeholder emails.

4. SUMMARY OF FEEDBACK

Stakeholders were advised to complete the online survey and/or submit written feedback on the proposal by January 13, 2022. The feedback received is summarized below, organized by topic with sample quotes included.

Major Trade Associations

Formal responses were received from three major trade associations: Food, Health and Consumer Products of Canada (FHCP), the Retail Council of Canada (RCC) and the Canadian Beverage Association (CBA). These organizations represent stewards who collectively represent most of the annual fees paid to Stewardship Ontario. Each of the associations is strongly supportive of the proposal. A selection of quotes from their response letters appears below.

Food, Health & Consumer Products of Canada

• FHSP is pleased to support the proposal to implement a simplified approach to fee setting which, if approved, would also substantially remove the need for annual reporting for the Shared Responsibility portion of the Blue Box program.



 This approach adds greater predictability of fees while eliminating duplication of reporting requirements for stewards while providing operational efficiencies for Stewardship Ontario throughout the remainder of transition to EPR

Retail Council of Canada

- From a retail perspective, the difference between what needs to be reported between the previous legislation and the new regulation is material enough that members would have to calculate two completely different material handling fees per product in Ontario and remit different figures to SO and to the member's PRO for three years of transition.
- By moving to a simplified model, members have shared that SO's proposal greatly simplifies the transition years.

Canadian Beverage Association

- The simplified approach would help to reduce the administrative burden on Ontario businesses as they take on the blue box transition and grapple with the pandemic and economic recovery.
- Eliminating reporting (to Stewardship Ontario), which will cease to exist in just a few years, is a prudent approach to take as producers manage the largest blue box transition Canadian history.
- Adopting the simplified approach partially addresses producers' concerns about protecting their commercially sensitive data by preventing the submission of any new data.

The letters also made note of several relevant considerations that Stewardship Ontario would incorporate into its roll-out plan, should the proposal be approved.

Individual Comments Received

Stewardship Ontario also received several comments from individual stewards. In reviewing these comments, it is important to note that only a small minority of stewards provided specific comments, reflecting the tendency of many stewards' agreement with and reliance on their trade association to represent their views.

Acknowledgment of Option

A number of stakeholders acknowledged Stewardship Ontario's efforts for developing the proposal for their consideration:

- Thank you for the opportunity to provide comments on Stewardship Ontario's (SO) proposal to simplify the fee-setting methodology in the Blue Box Program Transition Plan.
- I think that it is great that SO is trying to assist the stewards by reducing effort required by them... overall it seems to be a sound option.
- Thank you for the wonderful presentation...
- It seems like a good plan. Won't really know until I see what kind of charges are being levied to us. Keep up the good work.

Proposal in Principle

Many survey comments and email submissions supported the proposal in principle, generally raising questions and issues similar to those who opposed the proposal:

- The proposed solution seems to be simplest and most transparent solution.
- Although we strongly encourage Stewardship Ontario to adopt the Simplified Approach, we also ask that you and your team work with [us] to address questions and gaps in the proposal.
- We see some benefit as it may reduce our costs for preparing and submitting our to-market data



- In order to fully understand the impact of the proposed change... and determine our support (or lack thereof), it would be beneficial if an example or formula be provided to display how steward rates would be adjusted
- This would be a major reduction in our administrative burden... my initial reaction is a yes to the proposal.
- Although this sounds very nice, and would eliminate lots of work on our part, I'm still not very comfortable with the change especially not knowing what to expect fee wise
- Risks and benefits have been explained in concept, however without any ballpark as to the potential decrease on fees to producers, our votes are truly blind.
- We think the proposal makes sense, but it's too late for 2022... We would recommend for these changes to be in effect for the 2023 reports and after.
- We believe the changed methodology is premature and should be considered next year.
- Based on the aforementioned [issues], we do not support Stewardship Ontario's proposal to use a simplified approach to fee setting.

General Issues

The majority of feedback included issues and questions about different aspects of the proposal, with some requesting detailed information about how it might apply to a specific steward. Information to address the queries was included in the general Q&A document and the webinar Q&A summary. The first three issues noted below generated the majority of comments and feedback, with the final two issues included primarily in the formal submissions:

Impact of Change: A number of stewards wanted to understand how the proposal would manage entries and exits of stewards during the windup, how divestitures/acquisitions would be treated, the impact of notable changes to supplied quantities by a steward and the treatment of newspapers.

- Stewards experiencing growth and increasing sales will benefit at the expense of Stewards with declining growth and decreasing sales.
- If setting fees from recent years (which would be nice to have a flat fee) there does need to be some sort of "Adjustment" process if a business dramatically decreases the amount of product they are selling.
- In the simplified fee setting approach proposed, how would our business change be accounted for?
- Our packaging has changed too much the past year and we would not realize the benefit of moving from plastic to paper packaging.
- As the proposed methodology doesn't account for sales fluctuation over time, and complexity when we buy/sell brands, or account for discontinued brands, we don't support this new methodology.
- How will departing and emerging stewards be addressed?...How will prior-year adjustments be addressed?
- The implications of this change on in-kind funding... has not been defined.
- It is unclear how Stewardship Ontario would use this to establish the split between in-kind advertising space and cash funding for the Obligation with no data on non-newspaper stewards supply-to-market data.

Expected Cost Savings: Stewards queried how much administrative savings would be realized by proceeding with the proposal and for the potential saving to be quantified.

- If there are savings to be found by reducing the workload on SO staff, and if those savings are passed on to Stewards in the form of lower operating costs, then this proposal could make sense.
- It is effectively impossible for Stewards to make an informed decision on this matter during this consultation period since the anticipated cost savings were not disclosed.

Stewardship Ontario

SIMPLIFED FEES: CONSULTATION REPORT

- Without any ballpark as to the potential decrease on fees to producers, our votes are truly blind.
- We would like to know the actual SO total budget the calculation would be based on
- Would like to be informed of the expected financial savings of this proposal to fully support.

Impact of Covid: Some respondents questioned the proposed formula to average the previous two years of data, noting that recent changes in material quantities driven by Covid did not provide a fair representation for the future.

- Conceptually agree with simplification, however I don't think the years chosen are a good reflection of a businesses on-going obligation.
- This method is a fair assumption of the average and as long as the upcoming year budget does continue to decrease I see it as a fair determination of fees for all Stewards.
- The only draw back is data used for the calculation may not allow for fluctuations related to pandemic closures.
- The proposal will penalize stewards who did good during the COVID 19 spike (2019-2020).
- Including a Covid year would unfairly allocate the costs to restaurants
- Concerned how market factors (Covid) could impact the benchmark costs of some Stewards and thus skew the charges to individual Stewards.

Packaging Reduction/Waste Reduction:

- The simplified reporting methodology approach disincentivizes stewards from pursuing impactful packaging changes and responsible packaging choices.
- We have reduced 50% of our waste in paper from the previous year and in 2021 we believe that we have lowered another 30%. With your proposed Simplified Approach it will cost us more.
- There is zero accountability in this methodology. It's a free for all then we get fees based on a baseline. There is zero incentive to improve.

Recovery Rate Calculations/Waste Audits

- Should Stewardship Ontario decide to proceed with the simplified fee-setting methodology, it is critical that it continue to make the material-specific recovery performance available
- How does SO plan to go about financing the enhanced studies, given its progressively diminishing budget over the 2023-2025 timeframe
- Continuing the collection of recovery data is important for planning purposes. The discussion paper notes that in the absence of supply data, Stewardship Ontario will conduct "enhanced" waste characterization studies.
- The proposal introduces risk into the ability to properly determine the performance of the Blue Box program across the province.

5. NEXT STEPS

Stewardship Ontario will reach out to all individual stewards and other stakeholders that submitted a comment or question to probe their response and provide any additional information they may require. Stewardship Ontario will also be mindful of all comments received and use them to inform future communications, and the roll-out of simplified fee setting, if approved.





APPENDIX A

LISTS OF STAKEHOLDERS THAT PARTICIPATED IN THE CONSULTATION

List of Webinar Attendees

3M Canada Company
A. Lassonde Inc.
Agropur Coopérative
Air King Limited
Alliance Agri-Turf Inc.
Amazon Canada

Amway Canada Corporation Anderson Watts Ltd.

Apex policy

Armstrong Milling Company

ARRIS Canada

Associated National Brokerage Inc.

Aviva Canada Inc.
Bag to Earth Inc.
Basics Office Products

Bath and Body Works (Canada)

Bayer Inc. Bell Canada

Best Buy Canada Ltd Bimbo Bakehouse Inc.

Blistex Ltd

Bonduelle Canada Inc Brock University

BSH Home Appliances Ltd.
Burnbrae Farms Ltd.
Canadian Home Publishers
Canadian Medical Association
Canadian Tire Corporation
CanPrev Natural Health Products
Canus Goat's Milk Skin Care Produc

Carrier

Carton Council
CCL Industries, Inc.
Certainteed Canada Inc.
Chatters Limited Partnership
Church and Dwight Canada Corp
Cimpress Windsor Corporation

Coca-Cola Canada Bottling Limited Company

Colgate-Palmolive Canada Inc. Compass Minerals Canada Corp. **Confederation College**

Costco Wholesale Canada Ltd Crate and Barrel Canada Inc.

CTG Brands Inc.

Custom Leather Canada Limited Cycle Environment - Consultant

D&G Labratories
D&L Sales Ltd.
Dell Canada Inc.
Diva International Inc.
Dixon Ticonderoga Inc.
Dr. Oetker Canada Ltd

Durham

Duststop Air Filters Inc

Empack

Enbridge Gas Inc. Epson Canada Limited Farm Boy Company Inc.

Ferring Inc.

FHCP - Association Fix Auto Canada Inc. Formula Brand Inc. Gap Canada GE Lighting

General Motors of Canada Company

Giant Tiger Stores Limited Grace Foods Canada Inc. Royal Grp Technologies Gray Ridge Eggs Inc.

Great Canadian Dollar Store (1993) Greater Sudbury Hydro Plus Inc.

Green Shield Canada Groupe Jean Coutu Guy Perry - Consultant Hallmark Canada Helen of Troy Hexo Operations Inc.

HFC Prestige International Canada Inc.

Holt Renfrew & Co., Limited Home Hardware Stores Limited



HoMedics Group Canada Co Ice River Springs Water Co. Inc.

International Cheese Company Ltd.

Investors Group

J.E. Russell Produce Ltd.

Joylypso Inc

JYSK Linen 'N' Furniture Inc.

Kal Tire

Kernels Pop Corn Limited Kleen Flo Tumbler Ind. Ltd. KriNos Foods Canada Ltd LAVO Kik Holdco Company Inc

La-Z-Boy Inc. Leese Enterprises

Lindt & Sprungli (Canada) Inc. Little Caesar of Canada Inc.

Lixil Canada Inc

Loblaws

Lorax Compliance - Consultant

Lovell Drugs Ltd Loyalist College Makita Canada Inc. Maple Dale Cheese Inc. Marble Slab Creamery Maroline Distributing Mary Browns Inc.

McDonald's Restaurants of Canada

McKesson Canada McMaster University Melitta Canada Inc. Meridian Credit Union Metagenics Canada Inc Methapharm Inc. METRO Ontario Inc

Mitsubishi Motor Sales of Canada, Inc.

Molson Coors MTD Products Limited Neat Freak Group Inc Nestle Canada

Miravo Health

Nestle Purina Pet Care

Nestle Waters New Balance Canada Nike Canada

Norrizon Sales and Marketing Group

Northbridge Financial Corp Ocean Spray of Canada Ltd Old Dutch Foods Ltd Ontario Government

Ontario Lottery & Gaming Corp

Owens Corning Insulating Systems Canada LP

Parmalat Dairy & Bakery Inc

Pascoe Canada Peavey Industries LP

Philips Domestic Appliances Canada

PPG Canada Inc.

Primo Foods Inc, and Unico Inc.

Primo Water

Procter and Gamble Puresource Corporation Queen's University RBC Financial Group Reclay StewardEdge

Retail Council Rev-Log

Rogers Medica Inc (Shopping Channel)

Rolex Canada Ltd.

Rona

Rothmans, Benson & Hedges Inc.

Roxul Inc. RPRA

Rust-Oleum Consumer Brands Canada

RW consumer products RWDI Consultant S & F Food Importers S.H. Kirkorian & Co Ltd. Sage Environmental

Sanofi-Aventis Inc, Sanofi Consumer Health

Saputo Dairy Products Canada G.P.

Shell Canada

Sheridan Nurseries Ltd.

Shurtape

SIPKENS NURSERIES LTD Smucker Foods of Canada Co

Sobeys

Sony Electronics Spin Master Ltd. SPINRITE LP

St. Joseph's Health Care London St. Lawrence College of Applied A STANDARD PRODUCTS INC.

Staples Canada

Stratford Festival of Canada

Subaru Canada Inc.

Sun Media a division of Postmedia Network Inc

Sunny Crunch Foods Ltd. Tele-mobile Telus Mobility

Tetrapak

Thane Direct(Canada Inc)
The Globe and Mail

The Mentholatum Co of Canada Ltd.

The Pepsi Bottling Group Thomas Large and Singer Toronto Star Newspapers Ltd.



Toyota Canada Inc.

SIMPLIFED FEES: CONSULTATION REPORT

Wakefield Canada Inc

Wawanesa Mutual Insurance Company

Wellbond Import Export Inc. Wing Hing Lung Limited

Winners Merchants International L.P

Yamaha Motor Canada Ltd.

Zoetis Canada Inc.

Toys 'R'Us Canada Ltd Tree of Life Canada Inc. University of Toronto University of Waterloo

Usana Inc

Van Rossem Consulting

Volkswagen Group Canada Inc.

List of Survey Respondents

3M Canada GRACIOUS LIVING INC - Royal Grp Technologies -

A&W Food Services of Canada Inc Royal Alliance

H. A. Kidd and Company Limited A. LASSONDE INC. Agropur Coopérative Hallmark Canada

Amazon Canada Fulfilment Services, ULC Hartz Canada, Inc. Amex Bank of Canada Helen of Troy Inc

Amway Canada Corporation **HFC Prestige International**

Anderson Watts Ltd. HoMedics Group Canada Co Arby's Restaurant Group Inc Home Hardware

Aviva Canada Inc. Ice River Springs Basics Office Products Ltd. John G. Hofland Ltd.

Bayer Inc. Joylypso Inc

Bell Canada/Bell Billing/Bell Mobility Junvir Investments Limited Best Buy Canada Ltd Kasseler Food Products Inc. **Brock University** Kernels Popcorn Limited

Bushnell Corporation Keurig Caleres Canada Inc. La-Z-Boy, Inc

Lindt & Sprungli (Canada) Inc. Campbell's Company of Canada Canada Dry Mott's Inc, A Keurig Dr Pepper Company Little Caesar of Canada Inc.

CANADIAN HOME PUBLISHERS Loblaws Inc. **Canadian Tire Corporation** Magtar Sales Inc. Church and Dwight Canada Corp Mary Brown's Inc

Coke Canada Bottling McKesson Canada

Colgate-Palmolive Canada Inc McMaster University Costco Wholesale Canada Ltd. Metagenics Canada Inc

D&G Laboratories Inc. Microvite Investments Ltd. Disticor Dairy Queen Canada Inc. Ming Pao Newspaper Canada Limited

Dell Canada Inc. Molson Coors Canada Dr. Oetker Canada Ltd MTD Products Limited **Duststop Air Filters Inc** Nature's Path Food Inc.

Eska Inc Nestle Canada Fairstone Financial Inc. Nike Canada

Farm Boy Company Inc Ocean Spray Int'l Services Inc.

Ferrero Canada Ltd. Old Dutch Foods Ltd

Ferring Inc. Pan American Nursery Products Inc. **GE Lighting** Panago Pizza Inc.

General Mills Canada Corporation RC Purdy Chocolates Ltd General Motors of Canada Company **Recipe Unlimited Corporation**



Red Bull

Regis Holdings (Canada) Ltd.

RONA inc./Ace Canada

Rothmans, Benson & Hedges Inc.

Rust-Oleum Consumer Brands Canada

Sanofi Consumer Health/ Sanofi-Aventis Inc

Saputo Dairy Products Canada G.P.

Sheridan College

Sheridan Nurseries Ltd. Shurtape Technologies Co Smucker Foods of Canada Co

Spin Master Ltd

St. Joseph's Health Care London TATA Consumer Products Canada

Teva Canada Limited
The Pepsi Bottling Group

THE TORONTO-DOMINION BANK Toronto Star Newspapers Ltd.

Toyota Canada Inc University of Toronto University of Waterloo

Volkswagen Group Canada Inc.

Wakefield Canada Inc

Water Pik Inc

Wawanesa Mutual Insurance Company

Wellness Natural Inc. Wismettac Asian Food Inc.

List of Email Submissions

3M Canada

Amazon

Anderson Watts Ltd.

Association of Municipalities of Ontario, City of Toronto, Regional Public Works Commissioners of Ontario and the

Municipal Waste Association

Canadian Beverage Association

Carton Council Canada

Cycle Environment

Food, Health and Consumer Products of Canada

HFC Prestige International Canada Inc.

Krikorian and Co. Ltd.

Lassonde Industries Inc.

Lovell Drugs

Nestlé Canada Inc.

PI Fine Art

Reclay StewardEdge

Region of Peel

Retail Council of Canada

Rothmans, Benson & Hedges Inc.

Thomas, Large & Singer Inc.

University of Toronto

VanRossem Consulting

Venture Forward Strategies

Wawanesa Mutual Insurance Company