



Ontario Pesticides, Solvents and Fertilizers Industry Stewardship Plan 2016-2020

Prepared and Submitted by
Product Care Association

with the collaboration of



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**ONTARIO PESTICIDES, SOLVENTS AND FERTILIZERS
INDUSTRY STEWARDSHIP PLAN**

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GLOSSARY OF TERMS

TERM	DEFINITION
Accessibility	The range of options by which Ontarians can dispose of pesticides, solvents or fertilizers, taking into account such factors as the number and location of collection sites including hours of operation.
Available for Collection	Estimated quantity of pesticides, solvents or fertilizers potentially available for collection and subsequently available for end-of-life management that is calculated using an available for collection factor against the amount supplied into market. Used as the denominator to calculate collection, reuse and recycling rates.
Collection Rate	Metric to measure the quantity of pesticides, solvents or fertilizers collected compared to what was available for collection. Calculated as a percentage with the numerator representing the quantity of pesticides, solvents or fertilizers collected and the denominator representing the quantity available for collection.
Collection Target	Projected quantity of pesticides, solvents or fertilizers to be collected on an annual basis, expressed as a percentage. <ul style="list-style-type: none"> - Under the MHSW Program Plan, this target is projected based on five-year estimates of available for collection. This ISP does not provide five-year estimates of available for collection. - Fertilizers do not have collection targets.
Collector	An entity engaged to collect pesticides, solvents or fertilizers from generators, including municipalities.
Consumer	Synonym for generator (see the definition for generator).
Canadian Consumer Specialty Products Association (CCSPA)	Canadian Consumer Specialty Products Association is a national trade association representing the consumer, industrial and institutional specialty products industry.
Diversion	The management and treatment of materials or products through reuse and/or recycling instead of disposal to landfill or incineration with or without energy recovery.
Diversion Rate	Metric to measure the quantity of pesticides, solvents or fertilizers diverted. Calculated as a percentage with the numerator representing the quantity of pesticides, solvents or fertilizers diverted and the denominator representing the quantity of the total waste diverted plus disposed.
Depot	Facility where generators can drop off pesticides, solvents or fertilizers, which may have varying hours and periods of operation by season.
Designated IC&I Generator (also referred to as a small quantity IC&I Generator)	An industrial, commercial or institutional generator (as defined by Ontario Regulation 347) that generates MHSW, arising from use of MHSM, that is not required to submit a Generator Registration Report with respect to that MHSW under subsection 18 (1) of Ontario Regulation 347, made under the Environmental Protection Act.
Environmental Handling Fee (EHF)	Means the amount paid by a member of the ISP to PCA per litre or kilogram of PSF materials sold or supplied in Ontario, according to the PCA schedule of EHF rates. The EHF's are used by PCA to pay the costs of operating the program.
Event	Collection service operated temporarily, typically a portion of one day, at which generators can drop off pesticides, solvents or fertilizers
Fertilizers	Means packaged products regulated under the Fertilizers Act (Canada). Further details are provided in Appendix B.
Generator	Generators are the consumers who make pesticides, solvents or fertilizers available for recycling or disposal, including residents, small quantity IC&I businesses, and large IC&I businesses.
Industrial, Commercial, Institutional (IC&I)	Industrial, Commercial and Institutional

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Industry Funding Organization (IFO)	A non-profit, industry-funded organization in Ontario that develops, implements and operates a waste diversion program approved by Waste Diversion Ontario for wastes designated by the Minister of the Environment.
Industry Stewardship Organization (ISO)	Any organization (including one Steward or a group of Stewards) that submits an Industry Stewardship Plan (ISP) to WDO for review.
Industry Stewardship Plan (ISP)	A Waste Diversion Ontario-approved plan allowing one or more Stewards to manage wastes that have been designated for a recycling program by the Minister of the Environment.
Municipal Hazardous or Special Materials (MHSM)	Goods and products which are sold or delivered for use in Ontario to generators that result in MHSW.
Municipal Hazardous or Special Waste (MHSW)	Waste that consists of municipal hazardous or special waste, or any combination of them, as defined by the Minister's Program Request Letter and Ontario Regulation 542/06 under the WDA.
Municipal Hazardous or Special Waste (MHSW) Program	The recycling program operated by Stewardship Ontario for the diversion of pesticides, solvents and fertilizers and other designated MHSM.
Ministry of the Environment (MOECC)	Ministry of the Environment and Climate Change in the Province of Ontario.
Minister	The Minister of the Environment and Climate Change for the Province of Ontario.
Ontario Regulation 542/06	The regulation under the WDA that designates MHSW.
Pesticides	Means pesticides including fungicides, herbicides and insecticides registered under the Pest Control Products Act (Canada) bearing the "DOMESTIC" classification that are required to display on the label the symbol shown in Schedule III of the Pest Control Products Regulation (Canada), the signal words "danger" or "warning" and "poison" and represented by the precautionary symbols octagon or diamond and the skull and crossbones. Further details are provided in Appendix B.
Processing	Manual or mechanical alteration of pesticides, solvents or fertilizers for the purpose of recycling.
Processor	An entity that engages in processing of pesticides, solvents or fertilizers for the purpose of recycling.
Product Care Association (PCA)	Product Care Association is the ISO who has submitted this ISP to WDO.
Pesticides, Solvents and Fertilizers (PSF)	Pesticides, Solvents and Fertilizers
Program Request Letter	The letter from the Minister to WDO dated December 12, 2006 requiring WDO to develop a waste diversion program (the MHSW Program Plan) for certain categories of MHSW, including pesticides, solvents and fertilizers.
Recycling	Refers to any operation by which materials are reprocessed into products, materials or substances, whether for the original or other purposes. It includes the reprocessing of organic material, but does not include energy recovery and reprocessing into materials that are to be used as fuels.
Recycling Efficiency Rate (RER)	Metric to measure the quantity of pesticides, solvents or fertilizers recycled compared to what was collected. Calculated as a percentage, with the numerator representing the quantity of pesticides, solvents or fertilizers recycled, and the denominator representing the total amount of pesticides, solvents or fertilizers collected through the ISP (minus reuse, if applicable). <ul style="list-style-type: none"> - In the MHSW Program Plan dated July 30, 2009, this is referred to as the Recycling Performance Rate.
Recycling Efficiency Rate (RER) Target	Projected quantity of pesticides, solvents or fertilizers to be recycled on an annual basis under the program, expressed as a percentage (minus reuse, if applicable). <ul style="list-style-type: none"> - Pesticides and fertilizers do not have RER Targets.
Recycling Rate	Metric to measure the quantity of pesticides, solvents or fertilizers recycled compared to what was available for collection. Calculated as a percentage, with the numerator representing the quantity of pesticides, solvents or fertilizers recycled, and the denominator representing the quantity of pesticides, solvents or fertilizers available for collection (minus reuse, if applicable). <ul style="list-style-type: none"> - Under the MHSW Program Plan, this is called the RER.
Recycling Target	Projected quantity of pesticides, solvents or fertilizers to be recycled on an annual basis under the ISP, expressed as a percentage of what was available for collection (minus

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	<p>reuse, if applicable). Calculated by multiplying the RER target for pesticides, solvents or fertilizers by the collection target for those materials.</p> <ul style="list-style-type: none"> - Under the MHSW Program Plan, this target is projected based on five-year estimates of available for collection. This ISP does not provide five-year estimates of available for collection. - A recycling target can only be calculated for materials that have an RER Target; pesticides and fertilizers do not have RER Targets.
Reduction	Activities by producers and consumers to avoid the generation of waste at source.
Reuse	Provision of a designated waste to another user for its intended purposes.
Service Partner	Means municipalities or Service Providers who provide service to PCA for the ISP
Service Provider	Companies that collect, transport and process or safely dispose of pesticides, solvents and fertilizers.
Small Quantity IC&I Generator	See the definition for Designated IC&I Generator.
Solvents	<p>Means liquid products that are intended to be used to dissolve or thin a compatible substance and:</p> <ol style="list-style-type: none"> 1. Are comprised of 10% or more of water-immiscible liquid hydrocarbons, including halogen-substituted liquid hydrocarbons; or 2. Are flammable as described in part (c) of “municipal hazardous waste” in Ontario Reg. 542; or 3. All of the above. <p>Further details are provided in Appendix B.</p>
Steward	The producers of a designated waste, such as brand owners, first importers, and manufacturers, who are required to report to an IFO for a waste diversion program.
Steward In Good Standing	Means a steward who is current with its financial and reporting obligations to Stewardship Ontario in accordance with the requirements of WDO.
Stewardship Ontario (SO)	The not-for-profit corporation funded by industry that operates Ontario’s MHSW and Blue Box programs.
Supplied to market	Sold, leased, donated, disposed of, used, transferred (the possession or title), or otherwise made available or distributed for use in the Province of Ontario.
Supply Chain	The system of handling the Pesticides, Solvents and Fertilizers returned to the program by including the collection system, transportation and recycling or other approved disposal options.
Transporter	A company that transports pesticides, solvents and fertilizers from collectors to processors.
Vendor Standard	Minimum operating standard that a service provider must meet on a continuous basis to be eligible to provide collection, transportation and/or processing services.
Visible Fee	Means a fee advertised or displayed separately from the price of the product to the Generator (e.g. Consumer), as a way to recover the cost of the EHF.
Waste Diversion Act (WDA)	Legislation passed in 2002 that provides for the development, implementation, operation and oversight of waste diversion programs and ISPs in Ontario.
Waste Diversion Ontario (WDO)	The non-crown corporation that oversees Ontario’s recycling programs, which currently include Blue Box materials, MHSW, used tires, and electrical/electronic equipment. As part of its oversight role, WDO is also responsible for evaluating, approving and overseeing ISPs.

1. INTRODUCTION

In accordance with the Waste Diversion Act (WDA), and Waste Diversion Ontario's (WDO) Procedures for Industry Stewardship Plans (WDO Procedures), Product Care Association (PCA) initially submitted an Industry Stewardship Plan (ISP) for the designated waste category of pesticides, solvents, fertilizers including fungicides, herbicides, insecticides; and the containers in which they are contained in Ontario on September 9, 2013 to Waste Diversion Ontario (WDO).

This ISP has been modified by PCA in response to comments and feedback received during the consultation process. Also, a Transition Plan has been added to the ISP as Appendix C to the ISP, in accordance with the WDO Transition Plan Guide dated January 14, 2014.

PCA is submitting this Pesticide Solvents, Fertilizers (PSF) ISP in Ontario with the collaboration of the Canadian Consumer Specialty Products Association (CCSPA) whose members constitute a large majority of PSF Stewards supplying materials into Ontario. CCSPA and PCA have entered into a memorandum of understanding by which PCA will manage the Ontario PSF ISP for the benefit of the CCSPA members and other obligated Stewards who choose to participate in the PCA ISP. The ISP is open to any obligated Steward whether or not the Steward is a member of CCSPA.

As of the date of this ISP, PCA has received 44 Letters of Intent from obligated Stewards representing 92% of the pesticides, 51% of the solvents and 89% of the fertilizers, in terms of quantity reported in 2013 to Stewardship Ontario (SO). A list of PSF Stewards who have indicated their intent to participate in the ISP is included in Appendix A. Copies of all signed letters of intent have been provided to WDO. Participation in the ISP is based on membership in PCA, and all existing and new PCA members will be required to agree to the PCA membership agreement including a supplementary agreement for Ontario program, and comply with PCA bylaws and policies.

PCA is a federally incorporated, not for profit product stewardship association governed by a multi sector industry board of directors. PCA has been the operator of the BC Household Hazardous Waste (HHW) stewardship program since 1997, and is now operating an HHW product stewardship program in Manitoba as well. PCA also participated in the development of the original (SO) MHSW Program Plan and implementation.

Over the last 20 years, PCA has developed and managed numerous product stewardship programs, and has steadily increased collection volumes in each program and product category it has managed. PCA has the experience and expertise to successfully manage complex product stewardship programs. Products managed in other PCA programs include paints and coatings, flammable liquids, lighting products, smoke and CO alarms and other household hazardous waste product categories. PCA is an Industry Stewardship Organization for paints and coatings in Ontario. The PCA Paint ISP was approved by WDO on December 10, 2014 and has an effective date of June 30, 2015

Currently PCA has over 60 employees including staff at PCA's administrative office in Vancouver, BC, as well as an office in Toronto and Montreal, and staff in Saskatchewan, Manitoba, Nova Scotia, Newfoundland, New Brunswick and Washington State supporting PCA's programs and services in each of those jurisdictions.

PCA has appointed an Ontario programs director, based in Ontario, to work on the development of the ISPs PCA has an office located in Toronto, Ontario, and will add additional staff as required upon the

approval of the ISP to implement and manages the ISP with support from PCA's administrative office in Vancouver.

This ISP describes the proposed program operating system and the transition plan. A significant element of the transition plan is that PCA has proposed to SO and to stakeholders and service providers that PCA would assume the entire "supply chain" for the ISP products. Additional information about this and other transitional matters is found in the Transition Plan which is Appendix C.

1.1. *Consultations*

Three webinar consultations were held by WDO on October 23, 2013, November 5, 2013 and April 9, 2014 to allow PCA to present the ISP in greater detail and to give the opportunity for stakeholders to ask questions and provide feedback. The ISP has been modified consistent with the issues and responses from the consultation process.

In addition to the WDO consultation webinars, PCA has also engaged extensively in direct consultations with stakeholders. Municipal outreach has included several meetings and presentations with the major municipal associations (Association of Municipalities of Ontario, Municipal Waste Association, Regional Public Waste Commissioners of Ontario) as well as in-person meetings and presentations with over 20 different municipalities. PCA has also met directly with a number of transporters and processors.

PCA has also been meeting on a regular basis with (SO, the Industry Funding Organization (IFO) that has operated the MHSW program. PCA and SO have been meeting since the summer of 2013 to discuss the potential transition process and communications to stakeholders involved in the MHSW program and potentially impacted by the ISP and more recently, with respect to the implementation of the PCA Paint ISP.

The consultation process is ongoing, and stakeholders are encouraged to contact PCA or WDO with any comments or requests for further information.

1.2. *Legislative background*

PCA is submitting this revised ISP for the designated waste category of Pesticides, Solvents and Fertilizers in Ontario as designated by Ontario Regulation 542/46 "Municipal Hazardous and Special Waste" under "Phase 1 materials" pursuant to the Waste Diversion Act, 2002. Section 34 of the WDA provides that Stewards who prefer to take direct responsibility for managing their WDA obligations may submit an ISP for consideration by WDO.

In 2006, SO was designated by the MOECC as the IFO for all Phase I MHSW. In July 2008, the Phase 1 MHSW Program Plan developed by SO and approved by the WDO and MOECC took effect. In 2009, a Consolidated MHSW Program Plan (the "CMHSW") was developed by SO and approved by the MOECC which included Phase 2 and Phase 3 materials. The CMHSW took effect on July 1, 2010. Phase 2 and Phase 3 materials were subsequently removed, however the CMHSW Program Plan is still in effect. The ISP performance targets reference the Year 5 targets in the CMHSW

Program Plan given that Year 5 is the current year. The ISP proposes Year 1 performance targets that either meet or exceed the Year 5 targets in the CMHSW Program Plan.

WDO will require PCA to enter into a program agreement as part of the approval process for the ISP. The proposed term of the program agreement is 3 years; however it is the intention of PCA to continue the operation of the program on an indefinite basis, as PCA is doing in other provinces.

2. DESIGNATED MATERIALS

2.1. *Product Definition*

This ISP is for the management of post-consumer pesticides, solvents and fertilizers wastes as defined in the Ontario Regulation 542/06 Municipal Hazardous or Special Waste (O. Reg. 542/06):

“fertilizers, fungicides, herbicides, insecticides or pesticides and containers in which they are contained” and “solvents and containers in which they are contained”

PCA proposes that the products included in the ISP will be the same as for the pesticides, solvents and fertilizers categories as defined in the current 2013 Stewardship Ontario MHSW Rules. Appendix B contains a list of included and excluded products. Consideration will be given to the harmonization of the definitions with any provinces with existing household hazardous waste stewardship programs that include any of these categories. The process will be undertaken after the commencement of the ISP, and any changes will be subject to the necessary approvals.

2.1.1. *Pesticides*

“Pesticides, fungicides, herbicides, insecticides, and the containers in which they are contained”

Pesticides, including fungicides, herbicides, insecticides are a federally regulated product under the Pest Control Products Act (Canada) bearing the “domestic” classification and are required to display on the label the symbol shown in Schedule III of the Pest Control Products Regulation (Canada), the signal words “danger” or “warning” and “poison”, and represented by the precautionary symbols octagon or diamond and the skull and crossbones. In Ontario, the sale and use of pesticides for cosmetic purposes has been banned since April 22, 2009, resulting in a significant decrease in sales of pesticides in Ontario. For a more comprehensive definition of designated pesticides see Appendix B.

The ISP will continue to accept pesticides in liquid, solid and aerosol forms as is currently managed by SO.

For all commercial class pesticides for commercial or agricultural use (which are outside the scope of both this ISP and the MHSW program) there is an existing program available for pesticides and their containers (<23 L), which is operated by the non-profit industry stewardship program CleanFARMS.

2.1.2. *Solvents*

“Solvents, and the containers in which they are contained”

Solvents are defined as a liquid product only, intended for use to dissolve or thin a compatible substance and:

- are comprised of 10% or more of water-immiscible liquid hydrocarbons, including halogen-substituted liquid hydrocarbons; or
- are flammable as described in part (c) of “municipal hazardous waste” in O. Reg. 542/06; or
- all of the above.

The ISP will continue to accept solvents in both liquid and aerosol forms as is currently managed by SO. The voluntary expansion of this category to include all flammables consistent with the category definition in other provinces will be considered in consultation with affected industry. For a more comprehensive definition of designated solvents see Appendix B.

If the definition of solvents were expanded to include flammables in the future, PCA, with the approval of WDO, will adjust the performance targets to reflect this inclusion.

2.1.3. *Fertilizers*

“Fertilizers, and the containers in which they are contained”

As a federally regulated product, fertilizers are defined as packaged products regulated under the *Fertilizers Act (Canada)*. For a comprehensive definition of designated fertilizers see Appendix B.

Empty farm fertilizer jugs and pails under 23 L are accepted by an existing stewardship program operated by the non-profit CleanFARMS.

2.2. *Types of Generators served by the Program*

The PCA program will manage program products generated by residential consumers, and small quantity Industrial, Commercial and Institutional (ICI) generators as specified in the Minister’s Program Request Letter to SO dated December 12, 2006. Accordingly, program products will not be accepted from large volume ICI generators, identifiable by registration under the Ontario Regulation 347 and generating greater than 100 kg of pesticides, solvent and fertilizer waste per month.

PCA will work with municipalities that may be interested in accepting and collecting PSF waste from small quantity ICI generators as well as investigating other potential collection systems for this category of generators.

2.3. *Market Supply, Container Sizes and Materials*

Pesticides, solvents and fertilizers are supplied into the Ontario market place through major retailers, hardware stores, garden centres and other channels, and are sold under manufacturer brand names or retailer private labels.

Common industry sized containers for pesticides in liquid form range from 1 g to 5 L, available in high density polyethylene (HDPE) containers or steel. Solid pesticides are typically packaged in sizes ranging from 50 to 500 g, and steel aerosols are available from 350 to 500 g. Containers for solvents are usually also made of plastic (#2 HDPE) or steel containers and are sold in liquid form in sizes ranging between 1 and 20 L. Fertilizers sold in liquid form come in containers ranging from 250 g to 5 kg, and dry or granulated products range from 1 kg to 30 kg.

2.4. *Quantity Supplied into the Marketplace*

PCA will require Stewards to report quantity supplied in litres or kilograms as is currently required by SO. The product sales data will be used to calculate the amount available for collection each year. e. This data will be used to determine litres of product, as well as tonnes (product only or product and container weight) using appropriate conversion factors, and aggregated for the purpose of reporting to WDO.

PSF Stewards are currently required to report the weight of containers to the SO Blue Box program. PCA expects to obtain this container weight information from SO and compare it to the container weight derived from reports made by Stewards to PCA.

The quantity of PSF material entering the marketplace for Year 1 to Year 5 of the ISP Program will be obtained from actual sales data as described above. The quantity of fertilizers sold into the market has been declining, particularly with the removal of weed and feed products by Pest management Regulatory Agency (PMRA) and Canadian Food Inspection Agency (CFIA). According to best available data and industry knowledge, quantities of pesticides supplied into the market have slightly decreased since 2011 and quantities of solvents supplied to market have been stable. Sales of pesticides and fertilizers are subject to seasonality, weather and changes in laws relating to the use and formulations of these products.

3. PROGRAM DESIGN

The following are the management options for the waste products in accordance with the pollution prevention hierarchy.

3.1. *Reduction*

A primary objective of the ISP is to encourage consumers to purchase the correct amount of PSF materials and to use up the products that they buy. For unwanted leftover products, the objective is to eliminate the improper disposal of PSF waste into the environment, while recovering the resources present in leftover PSF waste and their containers.

Tools such as fertilizer calculators assist Consumers in buying the right amount of fertilizer for the task at hand. PCA will work with stakeholders to develop these tools or utilize existing tools. PCA will support waste Reduction by encouraging Consumers to buy only what they need and to use up the PSF materials that they purchase.

As the success of waste Reduction efforts is difficult to quantify, no specific target has ever been developed for the Reduction of leftover PSF materials.

3.2. *Re-use*

There are limited opportunities for the re-use of pesticides and solvents. PCA will work with industry and municipalities to explore the re-use of fertilizers, including the on-site use by municipalities and within commercial composting facilities.

3.3. *Recycling*

While some opportunities exist for the recycling of containers, both plastic and metal, limited opportunities exist for the recycling of PSF materials. Efforts will be made to explore solvent recycling with interested processors.

- **Pesticides:**

Some opportunities exist for the recycling of pesticide containers, however there is none for their contents. All waste pesticides collected will be disposed of in a safe and responsible way. PCA will continue to explore opportunities for the recycling of pesticide containers (plastic and metal).

- **Solvents:**

Some opportunities exist for the recycling of solvent containers (plastic and metal). PCA will explore opportunities for solvent recycling and increasing the recycling of containers.

- **Fertilizers:**

There are currently no opportunities for the recycling of fertilizers. All fertilizers collected which cannot be reused will be managed in a safe and responsible way.

- **PSF Containers:**

The program will provide for recycling of containers in which the PSF waste is returned, where recycling options exist for these containers.

The current system of accepting PSF, returned in non-original containers will continue, provided that this is acceptable to the municipal collection sites, and subject to appropriate precautions (as is now the case). PCA will discuss with collection sites how to best educate Consumers about the benefits of keeping PSF in their original containers.

3.4. *Standards and Registration / Qualification Process*

PCA will use the same standards for transportation carriers and processors as it is doing for the Paint ISP, which were adapted from existing SO standards. Service providers will be required to meet and conform to these standards in order to be eligible to manage waste PSF under the ISP. The service provider standards, policies and procedures may be revised and updated from time to time following consultation with the impacted stakeholders.

PCA will adopt all existing registration requirements of service providers currently in place with Stewardship Ontario, and intends to continue to use the same registration/qualification process to determine any additional transporters and processors. The registration/qualification process may be revised and updated from time to time following consultation with the affected stakeholders.

For future service provider procurement, PCA will ensure that a fair and transparent process is employed that allows an equitable opportunity to compete. PCA will inform WDO of its selection process and criteria.

4. **ACCESSIBILITY**

PCA has considerable experience in the development and management of collection systems to provide accessibility. PCA currently manages over 1500 collection sites, of which over 500 are municipal and 500 are return to retail.

Program products will be accepted at any approved collection location without charge. PCA has been actively consulting with the municipal collection system which currently collects PSF for the MHSW program. PCA intends to continue utilizing all existing collection facilities in Ontario which consist of municipal depots and events.

PCA will encourage additional municipalities to participate as collection sites with the program in order to continue expanding the collection network, in particular for northern and rural communities. PCA will also consult with service providers, retailers, municipalities and other organizations to identify other possible types of collection sites as well as ways to improve efficiencies with respect to the collection and management of program products.

Table 1: Collection System

Collection Channel	PCA ISP Year 1 Target	PCA ISP 4 Year Goal
Depots	150	25 additional collection sites for the following 4 year period
Events	500	

PCA will adopt the Minister-approved accessibility targets for SO Year 5 as indicated above for the ISP's Year 1. However it is noted that the current Supply Chain, as developed by SO, consisted of 89 depots, 331 events in 2014. Furthermore, the addition of new sites is dependent on external parties.

5. PROGRAM PERFORMANCE

The proposed WDO Plan Agreement provides that the ISP program performance will be assessed annually by WDO with respect to the following targets: including but not limited to (a) the collection target; (b) the recycling efficiency rate target and (c) the recycling target, calculated by multiplying (a) x (b).

Targets will be calculated based on terms and calculations outlined in the WDO document "Data Requirements for Monitoring Effectiveness and Efficiency of Waste Diversion Programs in Ontario".

In order to report program performance statistics, PCA will employ a database system to record and track waste materials managed from point of collection to consolidation, recycling and/or disposal. Data will be collected to track the quantity of program products received by the collection system. In addition, data reports will be required of all processors to track residual volumes of PSF received by the program, and how those volumes are managed. This data will be recorded and used for auditing purposes as well.

5.1. *Available for Collection factor*

Pesticide, solvent and fertilizer products are often stored by consumers for long periods of time with the intention of later use. Therefore the quantity of contents actually “available to collect” is difficult to determine and can only be estimated. PCA is not aware of any studies with regard to the amount of waste product actually generated by consumers.

PCA will continue to use the current available to collect factors currently used in the MHSW program.

PCA believes that a more accurate and transparent way of reporting the annual results could be achieved by not including an "available to collect" factor in results reported; however, this will be explored after gaining operational experience and consulting stakeholders.

Table 2: Available to Collect Factors for Year 1 to Year 5

Material	Units	Available to Collect Factor Year 1 to Year 5
Pesticides	%	25%
Solvents	%	35%
Fertilizers	%	2%

The volume of product supplied will be obtained from steward reports, which will be converted to weight using industry provided average conversion rates, and then the above factors will be applied in order to determine the "available to collect" value for the annual report. As better information on the collection of PSF becomes available to PCA, the available for collection factors will be reviewed at that time and adjustments made, if necessary. Any changes to the available for collection factor will require WDO approval.

5.2. *Collection Targets and Rates*

The following collection targets have been developed to meet or exceed the Year 5 (current year) collection targets in the CMHSW. The CMHSW Program Plan did not state a fertilizer collection target. It is anticipated that the volume of fertilizers available for collection will continue to decrease; therefore, no target is proposed by PCA. After consideration of the MHSW program performance in the past 2 years, the ISP will to maintain the Year 5 target from the CMHSW for Year 1 and Year 2 below. PCA is confident that after gaining operational experience and improving the collection system, Year 3, Year 4 and Year 5 targets can increase as shown below. As mentioned in section 2.1.2 if the definition of solvents were to be expanded in the future, PCA, with the approval of WDO, would revise these targets to reflect new product inclusions. In accordance with the WDO Plan Agreement, PCA will report the collection rate and the actual collection quantity on a quarterly basis to the WDO.

Table 3: Percent Collection Targets for Year 1 to Year 5

Percent Collection Targets	Units	Year 1	Year 2	Year 3	Year 4	Year 5
Pesticides	%	57%	57%	58%	59%	60%
Solvents	%	46%	46%	47%	48%	49%
Fertilizers	%	n/a	n/a	n/a	n/a	n/a

5.3. *Recycling Efficiency Rate Targets- the “RER” targets*

Consistent with the existing SO processing standards which the ISP proposes to adopt, all approved processors are required to report PSF waste containers recycled and the amount of waste materials produced. The tonnes of containers (metal and plastic) recycled will also be reported on. Under the WDA, landfilling, incineration and energy-from-waste are not considered recycling, and these tonnages will not be counted towards the volume of recycled product for the PSF ISP.

While some opportunities exist for the recycling of containers, both plastic and metal, limited opportunities exist for the recycling of PSF contents. While PCA will explore additional opportunities for fertilizer reuse, and solvent recycling, for the time being PCA will adopt the recycling efficiency rates from the CMHSW Program Plan. The CMHSW Program Plan did not state a fertilizer or pesticide RER target. Therefore, no target is being proposed by PCA and the focus will be on pollution prevention hierarchy outlined in section 3.

In accordance with the WDO Plan Agreement, PCA will report RER results on a quarterly basis to WDO.

Table 4: Recycling Efficiency Rate Targets for Year 1 to Year 5

Projected Recycling Efficiency Rate	Units	Year 1	Year 2	Year 3	Year 4	Year 5
Pesticides	%	Reuse or Safe Disposal				
Solvents	%	10%	10%	10%	10%	10%
Fertilizers	%	Reuse or Safe Disposal				

5.4. *Recycling Targets*

As there is no recycling efficiency rate for pesticides or fertilizers, there is no recycling target set for these products. The proposed Year 1 to Year 5 Recycling Targets for PCA are set out in Table 5. In accordance with the WDO Plan Agreement, PCA will report the recycling rate on a quarterly basis to WDO.

Table 5: Recycling Target for Year 1 to Year 5

Recycling Target	Units	Year 1	Year 2	Year 3	Year 4	Year 5
Solvents	%	4.6%	4.6%	4.7%	4.8%	4.9%

6. PROGRAM REPORTING

According to the Plan Agreement signed with WDO, PCA will report on a regular basis to WDO with regard to the operation and performance of the ISP. In order to track the performance of the program, WDO is requesting an annual business performance plan to be drafted and submitted in advance of each calendar operating year. In addition to the annual business performance plan, PCA will submit an audited annual report for each year of program operations to WDO, on behalf of the participating Stewards, in accordance with the WDA and the Plan Agreement between WDO and PCA. The annual report will also be made available online on PCAs website. The annual report will include information required by the Program Agreement and the Waste Diversion Plan.

The scope of work for the program performance audit will be determined through the development of an audit plan, in coordination with an independent third party auditor. PCA will provide a statement of revenues and expenses of the PSF ISP in Ontario.

7. RISK MITIGATION

PCA will be maintaining a strategy to mitigate and manage risks that may affect the achievement of targets stated in the ISP, whether the risks are operational, financial or legal. An important element of such strategy will be the minimization of environmental risk. PCA will work with contractors (collections sites, transporters and processors) to ensure compliance with environmental regulations and best environmental practices with respect to the collection, transportation and management/re-use of PSF. The environmental risk management system includes:

- System wide shipping documentation and tracking;
- Due diligence reviews of collection facilities, transporters and processors (primary and downstream) to ensure compliance and for tracking system verification, conducted by a third party auditor or in-house;
- Development of best management practices, including training, reporting and guidelines etc. for collection facilities and transporters.

8. PROMOTION AND EDUCATION

Communications, Promotion and Education activities will focus on increasing awareness of the pollution prevention hierarchy for Generators including safe storage for reuse, collection options and consumers buying what they need. PCA will attempt to drive behaviour change and support the collection system in order to achieve performance targets. PCA will collaborate with industry, WDO, SO, municipalities, retailers and other organizations on joint promotional materials to provide consistent messaging and reduce consumer confusion.

Significant efforts have been made by the Canadian Fertilizer Institute through their Nutrients for a Greener World campaign to inform consumers about using their fertilizers properly. PCA will align its awareness efforts with this initiative.

Below are some of the communication activities PCA has developed in other provinces that have proven to be successful in increasing awareness of the pollution prevention hierarchy of Reduce/Reuse/Recycle and driving behaviour change. Many of these activities can be the subject of joint initiatives between the program and municipalities.

Program Website

A program website will be developed to provide information to Ontario residents and businesses on:

- Collection site locations with details on hours of operation and products accepted
- Description of products accepted by the program
- Explanation of program funding
- Annual reports and other program information
- Information for Consumers on buying the right amount of PSF as well as the safe storage and handling of program products

Mobile Marketing

Explore opportunities to develop an informative app about PSF recycling. Integrate mobile, when appropriate, into other forms of outreach.

Website Linkages

Co-ordination with municipalities, regional governments, and counties, as well as other stewardship organizations including SO to establish links to the program's website.

Local Government Partnerships

Work with municipalities, counties and districts to promote the PCA program. Specific actions include:

- Advertising in municipal garbage collection/recycling calendars;
- Local government website linkages; and
- Point of purchase Consumer information material will also be made available to all municipalities free of charge.

Point of Sale (PoS) Materials

At Program launch, a package including retailer posters, brochures and/or rack cards will be distributed to all interested retailers. PCA will continue working with retailers after the program launch to investigate other methods that will increase the utilization of the point of sale materials in efforts to improve program awareness. Materials will be replenished upon request, free of charge, and materials will be regularly updated. This will also include email blasts, printable formats for display such as PDFs, LinkedIn and Facebook updates, apps for identifying collection sites and Events.

Point of Return Materials

Collection sites are offered program signage to display, and counter cards to distribute to Consumers

Purchased Media

Such as newspaper advertisements, and online advertisements

Earned Media

Such as press releases, newspaper and magazine articles, online blogs, broadcast news stories on TV and radio, etc.

Social Media

Use of various social media tools to communicate to both Service Providers and the public such as LinkedIn, Facebook, YouTube and Twitter. This will reach an audience which may not utilize traditional media sources.

Ambassadors Program

Consider implementation of a “summer ambassador program” whereby summer staff are hired as “ambassadors” for the program, and travel throughout Ontario, attending public events to provide information to Consumers, and visit collection sites and retailers.

Stewardship Program Collaboration

PCA has collaborated with other stewardship agencies in other jurisdictions in the past to develop common promotional materials and would look to collaborate with the existing IFO’s as well as any future ISP programs.

Community Events

Participation in community events, including distribution of promotional materials

Sponsorships and Partnerships

Promotion of the program through sponsorship of industry events such as conference proceedings, and industry related trade shows as well as speaking engagements to promote best practices and learnings.

Awareness, Research and Polling

Such as omnibus polling, online surveys, focus groups, etc. to understand Consumer awareness levels, views and attitudes around recycling and recycling behaviour.

9. TRANSITION

PCA’s intention is that the transition of the PSF Stewards and Supply Chain from SO to PCA will be accomplished as efficiently and effectively as possible, minimizing disruption or confusion for program members, stakeholders and program users. For further details on the transition period, please review the Transition Plan annexed to the ISP.

9.1. *Program Operations*

PCA’s objective of continuing to use the existing collection system and existing service providers is intended to minimize the effort required for the transition from the point of view of all stakeholders.

The transition should be seamless from the point of view of a consumer utilizing the system. The transition period is expected to take 3 months from the date of approval by WDO. The effective date will be approved by WDO. PCA has been meeting with SO on almost a weekly basis to identify and resolve transition issues.

To facilitate a full and comprehensive transition plan, both PCA and CCSPA have signed a non-disclosure agreement with SO, ensuring that accurate and current information is provided in the development of a viable transition plan. PCA will continue discussions with SO with the objective of achieving a mutually agreeable transition plan. Key transition plan elements for program operations include:

- **Product definitions:** the existing SO PSF product definitions will be adopted.
- **Municipal collection sites:** PCA will assume the obligations of SO with respect to PSF under all existing municipal MHSW agreements and will adopt the existing compensation system. After the transition is completed, PCA will consult with municipalities regarding any changes to the system.
- **Service providers:** PCA will continue the current service provider compensation systems and models. After the transition is completed, PCA will consult with service providers regarding any changes to the system. Some municipalities and service providers have reported that pesticides, solvents and fertilizers are more efficiently handled by them, in conjunction with paints and coatings. PCA will consult with all stakeholders in this regard (including SO, collection sites, service providers, and the Stewards of those products) to identify ways to maintain this efficiency.
- **Lab pack factors:** Due to the current practice of commingling the PSF products with other products having the same hazardous waste classification, it is necessary to utilize a protocol for the sampling of the commingled lab packs in order to determine the cost share of the program for PSF. PCA will continue utilizing this system, but will consult with industry, municipalities and service providers to determine if improvements can be identified or if alternative collection methods are practical.

It is recognized that Stewards representing a minority of the market volume of PSF will remain with the MHSW program for a period of time. PCA and SO have agreed that for efficiency, PCA will assume the obligations of SO under all “supply chain” contracts and systems for the ISP products and then would contract back to SO the use of the supply chain for the remaining IFO Stewards at a proportionate cost for which PCA charge on a “one invoice” basis for all services. This will substantially simplify the administrative effort required of SO to access the program operating system.

9.2. *Steward Transfer*

It is expected that the procedures used for the Paint ISP, by which Stewards will transfer from SO to the ISP, will be followed by this ISP:

- Steward registers and agrees to PCA's Membership Agreement as well as the Supplementary Letter of Agreement for Ontario Industry Stewardship Programs Membership.
- Steward confirms they are "in good standing" with SO (as determined by WDO).
- Steward must be and remain in good standing and remains obligated to pay its share of the IFO costs with respect to the period ending on the effective date of PCA's ISP.

9.3. *Program Cost Elements and Revenue Methodology*

Program expenses will be financed by Stewards participating in the ISP by payment to PCA of EHF's. Budgeted expenses will be allocated based on litres or kilograms of program products supplied into the marketplace, and EHF rates will be subject to adjustment from time to time as needed, subject to a notice period of at least 90 days. All program revenues will be applied to the operation of the program, including the collection system, transport, education and awareness, administration, recycling and disposal of collected residual products, as well as maintaining a reserve fund. Initial financing for the start-up of the ISP program will be made available from PCA's existing reserve funds, and this expense will be factored into the program budget.

Following the commencement of the ISP, the Stewards will be required to report and remit to PCA based on litres or kilograms supplied into the market. This will be done using PCA's existing reporting website/database system, which most Stewards are familiar with as they report for PCA's other provincial programs.

There are no Visible Fees as part of this ISP.

10. IMPROVING PROGRAM EFFICIENCY

PCA hopes to improve program efficiency over time, and is interested in collaborating with stakeholders to implement improvements to ensure program success.

Research and development activities to increase the effectiveness and efficiency of the program will be identified and shared with impacted stakeholders.

An effort will be made to forge relationships with key organizations doing innovative work on sustainability such as the Network for Business Sustainability based in southern Ontario. This will enhance the focus on environmental research and development as well as creating a greater awareness level within the public.

Possible projects could include:

- Investigate recycling options for mixed pesticides, or separated residual substances and contaminants, that are not suitable for energy recovery, both within and outside Ontario;

- Consultation with experts and associations, including Canadian Fertilizers Institute (CFI), and the Compost Council of Canada, CropLife and CleanFARMS, regarding opportunities for fertilizer re-use.
- Review options for soft packaging recycling of pesticides and fertilizers, including looking to partner with CleanFARMS on their film bag pilot studies.
- Research the potential for development and application of a universal labelling of fertilizers to improve consumer identification of products and opportunities for re-use.
- Assess opportunities for solvent recycling with existing recyclers and service providers, both within and outside of Ontario.

11. MOVING FORWARD

PCA is looking forward to continued interaction with WDO and program stakeholders on the operation of an efficient and successful program for the management of program products in Ontario. Below are some of the commitments PCA has made during the consultation period.

With regard to municipalities, PCA proposes to:

- Assume all existing municipal collection site agreements and compensation models for the ISP products.
- Work closely with municipalities and their associations to achieve a smooth transition.
- Develop a streamlined reporting and claims system for ISP products.
- Make prompt payment and offer electronic fund transfer.
- Continue consulting with municipalities on improvements and simplifications to reporting systems and overall program operations to increase efficiencies
- Discuss with municipalities the establishment of a transition committee
- Work with WDO to establish a transition committee

With regard to Service Providers, PCA proposes to:

- Carry over all SO approved service providers into ISP system.
- Maintain municipal-service provider relationships.
- Conduct on-going consultation with service providers and their associations to maximize program efficiencies.

With regard to Stewards, PCA proposes to:

- Operate an efficient product stewardship program, harmonized where possible with other PCA programs.
- Deliver administrative and operational efficiencies by utilizing our extensive Canada-wide experience.
- Improve communication with ISP Stewards and any new Stewards who wish to join the program.

Ontario Industry Stewardship Plan for Pesticides, Solvents and Fertilizers by PCA

PCA intends to consult with stakeholders on an ongoing basis, in an effort to continue to identify ways to improve program efficiencies and program performance.

APPENDIX A:

List of ISP Participants

Fertilizers (8)

Canadian Tire Corporation, Limited
Chalifour Canada
Costco Wholesale Canada Ltd.
Loveland Products Canada Inc.
Nu-Gro Ltd
Premier Tech Home & Garden Inc.
Scotts Canada Ltd.
Home Hardware Stores Limited

Pesticides (11)

Canadian Tire Corporation, Limited
Chalifour Canada
Dynamic Paint Products Inc
Home Hardware Stores Limited
Nu-Gro Ltd
Premier Tech Home & Garden Inc.
Recochem Inc.
Rona Inc.
S.C. Johnson & Son Ltd.
Scotts Canada Ltd.
TruServ Canada Inc.

Solvents (25)

3M Canada Company
Behr Process Canada Ltd
Benjamin Moore & Co., Limited
Canadian Tire Corporation, Limited
Chalifour Canada
Chrysler Canada Inc
CRC CANADA INC
Dynamic Paint Products Inc
General Paint Corp
Home Depot of Canada Inc.
Home Hardware Stores Limited
Honda Canada Inc
Kleen Flo Tumbler Ind. Ltd.
Korzite Coatings Inc.
National Shoe Specialties Ltd.
NCH Canada, Inc.
Nu-Gro Ltd
Piston Ring Service
PPG Canada Inc.
Radiator Specialty Co of Canada
Recochem Inc.
Rona Inc.
The Sherwin-Williams Company
Thomas & Betts Ltd.
TruServ Canada Inc.

List current as of May 15, 2015.

Electronic copies of each letter of intent to join the ISP have been provided to WDO, and are available upon request from PCA by emailing ontario@productcare.org

APPENDIX B:

Description of ISP Material Inclusions and Exclusions

Solvents				
<p>Definition: Means liquid products that are intended to be used to dissolve or thin a compatible substance and:</p> <ol style="list-style-type: none"> 1. Are comprised of 10% or more of water-immiscible liquid hydrocarbons, including halogen-substituted liquid hydrocarbons; or 2. Are flammable as described in part (c) of “municipal hazardous waste” in Ontario Reg. 542; or 3. All of the above. 				
<p>Notes:</p> <ul style="list-style-type: none"> • Includes containers in which it is contained. • Water-miscibility means the ability of a material (or mixture) to mix uniformly with water, without separating. A 1:5 ratio of material to water at 20°C does not display visible separation in less than 1 hour. This includes mixing by dissolving, reacting, suspending, or dispersing. [ref. CSA Z752]. 				
Sectors into which MHSM is Supplied	Examples	Exclusions	Reporting Categories	Unit of Measure
<ul style="list-style-type: none"> • Residential • Designated IC&I Businesses (small quantity generator) 	<ul style="list-style-type: none"> • Turpentine, alcohols (methanol, isopropanol, ethanol), ketones (acetone, methyl ethyl ketone), mineral spirits • Xylene, toluene, linseed oil, naphtha, methylene chloride • Automotive body resin solvents, contact cement thinners, degreasers • Products marked as paint thinners, lacquer thinners, paint strippers • Solvents in aerosol containers that match the definition of Solvents • Solvents supplied in containers equal to or less than 30 litres and or 30 kilograms 	<ul style="list-style-type: none"> • Products supplied as fuels • Household cleaning products that are not supplied as solvents • Products supplied in containers with a volume greater than 30 L or 30 kg 	L or kg supplied	Number of units supplied

Pesticides				
<p>Definition: Means pesticides including fungicides, herbicides and insecticides registered under the <i>Pest Control Products Act (Canada)</i> bearing the “DOMESTIC” classification that are required to display on the label the symbol shown in Schedule III of the <i>Pest Control Products Regulation (Canada)</i>, the signal words “danger” or “warning” and “poison” and represented by the precautionary symbols octagon or diamond and the skull and crossbones.</p>				
<p>Notes:</p> <ul style="list-style-type: none"> • Includes containers in which it is contained. • Products that match the definition of both Paints and Coatings and Pesticides are to be reported under Pesticides. 				
Sectors into which MHSM is Supplied	Examples	Exclusions	Reporting Categories	Unit of Measure
<ul style="list-style-type: none"> • Residential • Designated IC&I Businesses (small quantity generator) 	<ul style="list-style-type: none"> • Pesticides meeting the definition that bears the “DOMESTIC” classification • Pesticides in aerosol containers that match the definition of Pesticides • Pesticides supplied in containers equal to or less than 30 litres and/or 30 kilograms 	<ul style="list-style-type: none"> • Commercial, agricultural and restricted classifications registered under the Pest Control Products Act (Canada) • Insect repellents for personal use • Sanitizers, disinfectants and anti-microbial products • Pet products • Products regulated under the Food and Drug Act (Canada) • Pool chemicals • Insecticidal soaps • Diatomaceous earth • Ant traps • Liquid or Solid Pesticide supplied in containers greater than 30 litres and/or 30kilograms 	L or kg supplied	Number of units supplied

Fertilizers				
Definition: Means packaged products regulated under the <i>Fertilizers Act (Canada)</i> .				
Notes: <ul style="list-style-type: none"> Includes containers in which it is contained. 				
Sectors into which MHSM is Supplied	Examples	Exclusions	Reporting Categories	Unit of Measure
<ul style="list-style-type: none"> Residential Designated IC&I Businesses (small quantity generator) 	<ul style="list-style-type: none"> All N-P-K fertilizers, micronutrients and supplements that are required to be registered under the <i>Fertilizers Act (Canada)</i>, and therefore would bear a <i>Fertilizers Act</i> registration number supplied in containers equal to or less than 30 litres and or 30 kilograms including: <ul style="list-style-type: none"> Products that have a registration number and are used by homeowners, commercial applications, or agricultural operations Herbicide and fertilizer combination products (weed and feed) Crabgrass control and fertilizer combination products, other fertilizer and pesticide combination products Micronutrient mixes that contain micronutrient only such as chelated iron or chelated copper Fertilizers that are growth regulants as rooting hormones 	<ul style="list-style-type: none"> Compost (that does not make an N-P-K claim) Fertilizers and supplements exempted from registration including: <ul style="list-style-type: none"> A) Fertilizers and supplements set out in Schedule II (<i>Fertilizer Regulations</i>); B) Farm fertilizers that do not contain pesticides and that satisfy section 10 (<i>Fertilizer Regulations</i>); C) Supplements sold only for correction of soil acidity or alkalinity; D) Supplements referred to in subsections 10.2(1), 10.2(1.1), 10.2(3) and 10.2(5) (<i>Fertilizer Regulations</i>) E) Peat, peat moss, sphagnum moss, tree bark and other fibrous organic matter that is represented for use only in improving the physical conditions of the soil; F) Customer-formula fertilizers; G) Specialty fertilizers, other than those referred to in paragraph (b) of the definition “specialty fertilizers”, that do not contain pesticides, and H) Potting soils that contain supplements, if those supplements are registered under the <i>Fertilizers Act (Canada)</i> I) Fertilizers supplied in containers greater than 30 litres and/or 30 kilograms 	L or kg supplied	Number of units supplied

APPENDIX C:

Transition Plan

INTRODUCTION

The Pesticide, Solvent and Fertilizer ISP (PSF ISP) was submitted to WDO by Product Care Association (PCA) on September 9, 2013 and contains a summary of the transition plan in section 9, as required by item 22 of the checklist for ISPs. This document contains responses to the ISP transition plan guide issued by WDO and is included as an appendix to the ISP.

The transition plan analyzes the most efficient ways to achieve the transition from the point of view of all stakeholders and to consider the potential impact of the ISP on the underlying IFO, Stewardship Ontario (SO), as well as the municipalities, Stewards and service providers participating in the program.

PCA is in the process of implementing the Paint ISP which was approved by WDO and has an effective date of June 30, 2015. Many of the stakeholders and elements of the implementation of the PCA Paint ISP will be similar for the PSF ISP and will facilitate the transition process.

In the case of the PSF ISP, the products are currently managed by SO, the designated IFO under the Waste Diversion Act. PCA and SO have been working together for a considerable period of time before and after the submission of the draft ISP to develop a workable transition plan. PCA has also consulted extensively with other stakeholders including municipalities and service providers with regard to the ISP submission and will continue to do so after the ISP becomes operational.

Because of the substantial market share of the Stewards who have indicated their intent to participate in the ISP, PCA and SO have agreed that the approach to the required transition is that:

- PCA will take over the existing PSF “supply chain” from SO, rather than developing a parallel system.
- Any changes or improvements to the supply chain will be much more effectively considered and addressed after PCA is directly managing the supply chain, and has a greater opportunity to consult with stakeholders with regard to day-to-day operations.

In this context, as the transition plan will indicate, the intent is to accomplish the transition of SO’s supply chain to the ISP, and after that has been completed, to have an ongoing process of evaluation of program performance in order to identify potential improvements. It was noted by a number of stakeholders during the consultation process that, following the numerous changes to the MHSW program since its inception, a period of stability would be beneficial. PCA intends to continue consultation with stakeholders after the effective date of the ISP.

PCA agrees to participate in a process led by WDO to address and mitigate municipal concerns regarding “fragmentation” of the MHSW program. PCA acknowledges that this transition plan might need to be amended, subject to WDO approval, as a result of this.

The PSF ISP was initiated by the Product Care Association with the support of The Canadian Consumer Specialty Products Association who supply a majority of the quantity sold of the PSF category.

CONTENT

WHAT ARE THE PROPOSED CHANGES COMPARED TO THE EXISTING SYSTEM?

Overview

As described in the ISP it is the intention of PCA to maintain important elements of the existing MHSW program operations as they relate to PSF in order to achieve a smooth transition, including:

- Collection, transportation and processing standards: PCA intends to adopt the current collection, transportation and processing standards as developed by SO.
- Collection System: Maintain the existing municipal collection systems, including municipal /service provider relationships.
- Municipal compensation: Assume all existing municipal collection site agreements and municipal compensation models for PSF.

The following changes are proposed with regard to reporting systems:

- Program revenue model and steward reporting system: PCA will implement a unit-based revenue model of per kg or per litre sold.
- Service Partner reporting system: PCA has developed a reporting system for transporters, processors and municipalities to report their claims. For ease of transition, the reporting system is similar to the reporting methods used at the current IFO. By the time this ISP is active, many Service Partners will have used the PCA reporting portal in conjunction with the Paint ISP. At the same time it is the intention of PCA to expedite the claims approval and payment process.

As PCA gains experience in the management of the supply chain following the effective date of the ISP, PCA will continue consultations with stakeholders including municipalities, service providers and Stewards in order to identify ways to improve program performance and efficiency.

WHAT WOULD CHANGE FOR CONSUMERS?

Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes. For example:

Outline and explain any changes to consumer accessibility (e.g., collection sites) for recycling services.

PCA will maintain the elements of the MHSW program that are important to the consumer, including: accessibility, product definition, while working to improve consumer awareness:

- Collection system: the existing municipal system will be continued, while opportunities to increase the number of collection sites will be investigated.
- The products accepted from consumers will not change.

The PSF ISP will assume the existing collection system. PCA will adopt the Minister-approved accessibility targets for SO Year 5 as indicated above for the ISP's Year 1. However it is noted that the current Supply Chain, as developed by SO, consisted of 89 depots and 331 events in 2014.

Identify any other changes for consumers.

PCA intends to improve consumer awareness, and has developed a strong track record in other provinces and intends to apply similar communication outreach in the province of Ontario (Program Website, Social Media, Point of Sale Materials, Community events etc.) working in cooperation with municipalities and Stewards, as well as with SO and WDO with regard to the remaining MHSW products.

Except as noted above, there are no other changes proposed that will affect consumers/end users of Pesticides, Solvents and Fertilizers.

WHAT WOULD CHANGE FOR STEWARDS?

Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes.

In general it is intended that Stewards will have a more direct role in program governance, in that PCA and its Board of Directors deal only with household hazardous and special waste products. Also administrative efficiencies are anticipated due to the fact that PCA already administers similar programs in two other provinces. Changes that would occur in the first year of the operation of the ISP that would impact the Stewards include:

- Stewards participating in the ISP would need to either join PCA as a member or extend their membership in PCA to include the ISP
- Reporting of quantities sold and remittance of fees would be effected by Stewards through the PCA reporting system, which will be consistent with the fee and reporting system used by PCA for other programs in other provinces, which most Stewards are familiar with.
- While initiating their participation in the ISP the Stewards will be required to complete the wind down of their participation in SO for PSF as specified by WDO. This will include filing reports and making payments as required for the final period of operations in which the Steward participated, and any resulting reconciliations among SO Stewards relating to current or prior periods.

If the Steward is a participant of SO for designated products other than PSF, that relationship will continue unchanged.

Outline the proposed changes to the stewards' reporting framework and the rationale for those changes.

Stewards currently report sales to SO on a quarterly basis, and are subsequently invoiced by SO for their determined share of costs during that reporting period, subject to annual “true-up” adjustments after the end of the fiscal year.

The ISP revenue model will be based on units of PSF sold during the reporting period, which will give Stewards much improved cost predictability. The units will be based on the litres or kilograms of product as currently used in the other PCA PSF programs. Rates will be determined based on budgets approved by the PCA Board of Directors with input from Stewards. Generally budgets are based on a multi-year plan and actual program financial performance is regularly compared to budget. A minimum of 90 days notice would be given of any rate increase or decrease required.

Stewards participating in the PSF ISP would report sales of PSF to PCA on a monthly basis, as is the practice with other PCA programs, provided that participants with projected annual fees below a specified threshold (currently \$10,000) will be entitled to request quarterly reporting, subject to conditions. PCA will consult with Stewards with regard to any other revenue related policy changes.

In order to complete the monthly reports, Stewards would log on to the existing PCA reporting portal, enter sales data for the previous reporting period and an invoice would be automatically generated for that period. Reports and payments must be completed within 30 days of the end of the report month.

If the ISO operates sister programs in other provinces, would the reporting framework be harmonized across jurisdictions?

PCA currently manages 14 product Stewardship programs in 8 provinces and will be implementing the Paint ISP in Ontario on June 30, 2015. The steward reporting system is harmonized as much as possible with programs for similar products managed by PCA, subject to differences in product definitions. Rates paid by Stewards vary by program for a number of factors including sales, recovery rates, supply chain costs, regulatory costs etc.

Discuss the extent of fragmentation from a Steward perspective, which could be caused by the need for a Steward to report to the ISO (for the ISP materials), to the IFO (for remaining materials in the 'basket of goods' that would continue to be managed by the IFO), and/or to other ISOs should WDO approve ISPs for other materials in the 'basket of goods' in the future.

Most Stewards who have indicated their intent to participate in the PSF ISP are already members of PCA for other programs in Canada and will find it more convenient to report PSF using the same reporting system they currently use for all PCA programs. Stewards will be required to continue to report to SO for other MHSW products as applicable.

WHAT WOULD CHANGE FOR MUNICIPALITIES?

Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes.

In order to achieve the smoothest possible transition, it is proposed that PCA will assume the obligations of SO under the existing “supply chain” for PSF. This would be accomplished as follows:

- PCA would assume the obligations of SO under all existing municipal collection agreements with respect to PSF including the share of hourly depot hours and the tonnage rate paid to each municipality for PSF collected at events. PCA proposes to accomplish this by modifying the PCA-municipal ISP services agreement which is being used for the PCA Paint ISP
- PCA will adopt the current reimbursement compensation model for the transportation, processing and safe disposal of PSF collected materials from municipal depots and events.

PCA is committed to continuous improvement for PSF ISP operations in terms of performance and efficiency, but considers that potential changes to the program operations will be best identified after a reasonable period of direct program management by PCA and consultation with stakeholders. Through the consultation process for the ISP approval, PCA has received many comments and suggestions with regard to the existing program and potential changes. Some examples of issues that have been raised during the consultation process that might be considered for review during the first year of operations are:

- Improvement and simplification of the reporting system by which municipalities submit claims for payment or reimbursement, particularly with respect to the requirements for submitting supporting documentation, while maintaining the integrity of the claims process.
- Improvement in payment timing.
- Investigate options to avoid the requirement to weigh every collection container.

Are changes to the collection site standards expected? Provide the new collection site standards, if they are known. Describe the proposed outreach/consultation that would be used to develop additional changes to collection site standards.

PCA adopted the MHSW Collection Site Standards developed by SO (version of October 1, 2012) for the approved Paint ISP. These same Collection Site Standards will be used for this PSF ISP and are included in the PCA-Municipal ISP Services Agreement used for the PCA Paint ISP.

PCA will consult with municipalities on collection site standards to identify ways to improve the efficiency of the collection system and reporting requirements.

Are changes expected to the reporting framework? If so, explain any proposed changes and discuss their potential impact on municipalities (e.g., costs, administrative work). Outline efforts to mitigate any concerns. For example, would a one-window reporting system for municipalities be possible?

PCA has devoted considerable time to meet with municipalities in order to understand the current claims system to develop a new Service Partner reporting system that offers a similar user experience. PCA will continue to consult with stakeholders to identify ways to improve and simplify the entire reporting and payment process while maintaining integrity. In particular PCA will work with municipalities and service providers to identify ways to simplify the current requirements for the submission of supporting documentation.

Will there be training for municipalities on the new requirement?

By the time of the start of the PSF ISP, most Service Partners will be familiar with the PCA Service Partner reporting system, because they currently use the reporting system for paints and coatings. Webinars and downloadable training materials are available for Service Partners as well as qualified staff will be available to address any reporting issues or queries before and after the implementation date.

Address the extent of fragmentation from a municipal perspective, which could be caused by the need for the municipality to report to the ISO (for the ISP materials, to the IFO (for the remaining materials in the ‘basket of goods’ that would continue to be managed by the IFO), and/or to other ISOs should WDO approve ISPs for other materials in the ‘basket of goods’ in the future.

PCA is aware of the concerns of municipalities with regard to “fragmentation” relating to reporting and compensation for various MHSW products. In consultation with municipalities and service providers, PCA developed a Service Partner reporting system that will serve both the PCA Paint ISP and the PCA PSF ISP. The PCA Service Partner portal functions are similar to the current SO portal, which will simplify the reporting process and reduce the administration effort required by municipalities. PCA will continue consultation with municipalities and service providers to find ways to reduce fragmentation from a municipal perspective and will consider other reporting improvement recommendations, such as the request to reduce the amount of supporting documentation required

with each claim. PCA is also committed to working with WDO and other stewardship organizations in an effort to identify other ways to harmonize and standardize the reporting process to reduce fragmentation.

Outline the proposed system for municipal contracts and compensation.

In a communication dated December 3, 2013, SO and PCA advised all municipalities with which SO has an MHSW contract of the intention of PCA to assume the obligations of SO with respect to PSF as of the effective date of the PSF ISP. In consultation with the municipal associations Association of Municipalities of Ontario, Regional Public Works Commissioners of Ontario, and Municipal Waste Association, PCA has developed a PCA-Municipal ISP Services Agreement which will be used for each municipality providing service to the PCA Paint ISP. It is PCA's intention to amend this Agreement to include PSF ISP materials.

The obligations relating to PSF ISP materials and the municipal collection channel that would be assumed by PCA include:

- Payment of its share of hourly collection rates relating to PSF ISP (as set out in the January 1, 2014 amendment agreement between each municipality and SO).
- Reimbursement for transportation, processing and safe disposal of PSF materials collected at municipal depots
- Payment of specified tonnage rate for collection and post-collection costs for PSF materials collected at events.

PSF materials represent 5.8% of the weight of MHSW materials now collected at municipal depots.

If appropriate, explain how co-mingled materials and materials inbound from different sources (IC&I and residential) would be addressed.

The category of PSF materials are commingled in collection containers. Currently, the cost of the PSF ISP materials are divided between the municipality and SO using Stewardship Ontario's lab pack sampling methodology ("SO methodology for Lab Pack Audits- April 2013"). If this ISP is approved, SO will no longer have a supply chain obligation to municipalities for PSF materials and the municipalities will only need to report to PCA. Also any PSF materials found in commingled aerosol lab packs will also be reported to PCA, thus further reducing reporting fragmentation.

Outline the ISO's proposed approach and timeline for negotiating new municipal agreements, if municipalities do not agree to accept assignment of the existing IFO – negotiated contracts.

PCA consulted and worked extensively with a municipal transition team including representatives of Association of Municipalities of Ontario, Regional Public Works Commissioners of Ontario, and Municipal Waste Association to develop a PCA-Municipal ISP Services Agreement. These municipal representatives and associations have accepted the form of the agreement which has been distributed to all municipalities participating in the PCA Paint ISP. It is PCA's intention to amend this agreement to add PSF, and then provide municipalities sufficient time prior to the PSF ISP effective date in which to review and sign the amended agreement. If any agreements are not returned to PCA by the effective date of the PSF ISP, then payments for depot hours and collected materials during such period will be retroactively paid upon receipt of the signed agreements.

It is recognized that a number of Stewards will remain with SO as of the effective date and that SO, as the IFO, will continue to have obligations to operate a collection system. It has been proposed by PCA to SO that PCA will take over 100% of the supply chain for PSF materials, and then contract back those services to SO, at a cost proportional to the market share of the remaining Stewards. This approach would provide administrative advantages to both SO and the municipalities.

If the ISP would impact any contracts between municipalities and waste management companies, then describe how the ISO proposes to address these impacts.

There will be no changes or impacts to municipal relationships or contracts with Service Providers as a result of the PSF ISP. SO amended their New Municipal Hazardous or Special Wastes Services Agreement in 2015 with municipalities to allow SO to no longer be responsible to pay for MHSW Services provided by the municipalities with respect to the materials for which the ISP is approved. Also as demonstrated with the Paint ISP introduction, there were no impacts to any contracts between municipalities and waste management companies.

Establish a plan to provide and consult with municipalities on an operational plan before full implementation of the plan, if this ISP is approved.

PCA and three municipal associations, AMO (Association of Municipalities of Ontario), RPWCO (Regional Public Works Commissioners of Ontario) and MWA (Municipal Waste Association) established a working group for the transition of the Paint ISP. It is PCA's intention to continue to consult and work with this ISP municipal transition committee, as they have the experience and knowledge required to work through the PSF transition. During the transition period, the following activities are proposed, and would be reviewed with the transition committee:

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PRE_APPROVAL DATE	
	Continue consultation with municipalities on supply chain transition and municipal contract arrangements
	Prepare language to amend the PCA-Municipal ISP Services Agreement
	Prepare new upload reporting spreadsheet
	Analysis of supporting documentation requirements
APPROVAL DATE	
MONTH 1	In conjunction with the municipal ISP committee develop a communication strategy and start rolling out communication elements with them
	Distribute documentation for transfer of amended municipal agreement
	Review and development of reporting and claims system to accommodate PSF reporting
MONTH 2	Continue communication touch points with municipalities via letters, emails and webinars (if required)
	Review of proposed reporting and claims system and supporting documentation requirements
	Consult on supply chain transfer steps
MONTH 3	Continue communication touch points with municipalities via letters, emails and one on one meetings
	Complete preparation for ISP effective date including:
	✓ Reporting system registration, and training (if needed)
	✓ Other transition step requirements

WHAT WOULD CHANGE FOR SERVICE PROVIDERS?

Describe what would and would not change (from the existing system) in the first year operations, and provide a proposed timeline for implementing those changes. For example, are there any changes proposed for:

1. Collection channels?
2. Collection, transportation, or processing standards?
3. Compensation?
4. Reporting?

In the PSF ISP, PCA proposes that service providers will continue to participate in the same way that they do now for the MHSW program. PCA proposes to adopt:

- The same process for reimbursement to the municipality for transportation, processing and safe disposal of PSF ISP materials collected at municipal depots.
- Payment to municipalities of specified rates per tonne of PSF ISP materials collected at events (in which case the service provider contracted directly with the municipality).

PCA has met with many of the service providers during the consultation process and has received from them a number of suggestions for changes, such as modifications to some of the transportation zone rates, or consideration of the possibility of combining municipal and return to retail transportation systems.

PCA proposes to continue utilizing all of the existing collection channels. It is PCA's intention to continue to expand the collection system to provide additional convenience to consumers. PCA has adopted the collection, transportation and processing standards as developed by SO.

PCA will continue to consult with municipalities, retailers, transporters and processors on the operation of the system and based on the experience it gains in the operation of the PSF ISP, and with other programs across Canada, investigate ways to improve efficiencies in the collection and management of PSF materials.

Discuss how any existing service provider contracts between IFOs, municipalities or collection sites would be addressed, (e.g, would they be assigned?).

As PCA will deal directly with municipalities for PSF, there are no service provider contracts for PSF ISP materials between IFO and municipalities or collection sites to be addressed.

Discuss how any changes to how service providers would be selected from the new system (e.g., eligibility requirements, RFP process, etc.), and the timelines for implementing those changes.

There is no change proposed to the current system by which service providers participate in the program for PSF. For future service provider procurement, PCA will ensure that a fair and transparent process is employed that allows an equitable opportunity to compete. PCA will inform WDO of its selection process and criteria.

Establish a plan to provide and consult with service providers on an operational plan before full implementation of the plan, if the ISP is approved.

The following is a proposed list of activities to notify and prepare service providers for the operational transition:

APPROVAL DATE	
MONTH 1	Meet with service providers to establish a working relationship, improved knowledge base and sharing information about the PSF supply chain
	Develop a communication strategy and start rolling out plan for Service Providers
MONTH 2	Review and development of reporting and claims system to accommodate PSF reporting
	Continue communication touch points with service providers via letters, emails and webinars (if required)
	Consultation on supply chain transfer steps
MONTH 3	Continue communication touch points with service providers via letters, emails and one on one meetings
	Webinar, if needed with service providers on PCA reporting system
	Complete preparation for ISP effective date including:
	✓ Reporting system registration, training if needed
	✓ Other transition step requirements

OUTSTANDING ISSUES AND MAKING CHANGES AFTER THE ISP'S APPROVAL.

If after the ISP is approved, the ISO determines that additional changes are required to those proposed in the ISP, explain the ISO's process for consultation with affected stakeholders.

Discuss how the proposed changes will be communicated to stakeholders.

Outline any other outstanding concerns that would be addressed between the ISO and each stakeholder group.

As described in the ISP and in this Transition Plan, it is the intention of PCA to maintain existing program operations for PSF ISP materials as they currently exist in the MHSW program while continuing to identify potential improvements. For any proposed changes, PCA will consult with the affected stakeholders using the method of interface preferred by that stakeholder group. Methods of consultation could include written or oral communication, one-on-one and group meetings, committee meetings, and newsletters.

For municipalities, PCA will continue to interact with WDO, AMO, RPWCO and MWA, and has discussed the establishment of an ISP-municipal transition committee. Where committees are involved, communication would initially take place at the committee level, and then a record of the discussions would be provided by the committees to all participating municipalities to solicit further input. If appropriate for a particular issue, special committees can be set up which may include stakeholders such as Stewards or service providers.

PCA will communicate directly with Stewards participating in the ISP program as it currently does with all other programs it manages. PCA will also continue consultation with industry associations representing the Stewards including CCSPA and Retail Council of Canada.

Because of the competitive nature of the role of the service providers, discussions will take place one-on-one directly, but for certain topics group meetings may be appropriate. PCA has also consulted with OWMA to which many of the service providers belong.

HOW WOULD PROGRAM PERFORMANCE CHANGE?

See the “Program Performance” section of the ISP.

Discuss the challenges the ISO could face in transitioning the system.

In the context of the proposal to maintain the existing operational model, the transition to the ISP is not expected to negatively impact program performance.

Outline the steps the ISO would take to monitor the transition and address challenges.

PCA will continually monitor program performance by comparing current performance data to data available from prior periods and will maintain close contact with municipalities and service providers in order to identify any issues at the earliest possible stage and to resolve them.

EXPLAIN ANY CHANGES TO HOW MATERIALS WOULD BE RECYCLED?

Discuss the process and end-uses that would or could be used, and the rationale for any changes from the existing system.

While some opportunities exist for the recycling of containers, both plastic and metal, limited opportunities exist for the recycling of PSF contents. PCA will explore additional opportunities for fertilizer reuse, and solvent recycling. For the time being, PCA will adopt the recycling efficiency rates currently used by SO and outlined in Year 5 of the CMHSW.

Otherwise no change is proposed to the processes and end uses currently employed by the program for the recycling of materials, except for the preference by PCA of product to product recycling.

IDENTIFY ANY CHALLENGES THAT WOULD NEED TO BE ADDRESSED BETWEEN THE ISO AND IFO

Outline any outstanding concerns or requirements.

PCA and SO have held regular meetings since before the ISP was submitted, for the purpose of identifying and resolving issues relating to the transition of Stewards and operations. Three way meetings have been held with WDO from time to time to discuss these issues.

Current issues relate to the question of how to deal with the possibility of a relatively small number of Stewards (by volume) remaining with SO for some period of time after the ISP begins, and how to minimize the financial risk to SO of “stranded costs” during the transition period

SO and WDO have developed requirements which must be observed by PSF Stewards transferring from SO to PCA for the ISP which are intended to minimize the financial concerns related to stranded costs for SO so that according to the “nexus rule”, Stewards of other products/programs managed by SO (whether Blue Box or MHSW) do not pay costs that would otherwise be borne by the Stewards of PSF.

TRANSITION OVERVIEW

For the purpose of this transition plan, it is understood that:

- There will be a period of time between ISP approval and effective date.
- SO and PCA will have substantially completed a plan for the transfer of the entire PSF supply chain to PCA.
- Although Stewards representing a majority of the quantity of PSF ISP materials (“market share”) have indicated their intent to join the ISP, a significant number of Stewards, representing a minority of the market share, will not have indicated their intentions, or are awaiting the formal approval of the ISP.
- SO and PCA will continue a campaign of informing the Stewards of the status of the ISP, the number of Stewards who have joined the ISP, and the financial impact on the remaining SO Stewards of continuing a program for PSF.
- Remaining SO Stewards of PSF will continue to transfer to the ISP over a period of time extending past the ISP approval and effective date.
- SO is obligated to continue a program for remaining Stewards of PSF. At a point in time when the residual SO program for PSF becomes minimal in size, and SO and PCA enter into a final arrangement for the remaining SO Stewards of PSF.

SUMMARY OF TRANSITIONAL CHALLENGES/SOLUTIONS

Based on discussions between SO and PCA, the following challenges remain. For each of the challenges, the following solutions are proposed:

STEWARD/REVENUE MANAGEMENT

Issue: The challenge for SO of ensuring that no costs relating to SO's PSF ISP material program are borne by Stewards of other SO products or programs (the "nexus rule"), such as existing bad debts, especially as the market share of the remaining Stewards diminishes over time.

Solution: SO will invoice the existing (pre-ISP) pool of PSF Stewards for all pre-ISP costs, including supply chain and any wind-down costs such as existing bad debt. SO will continue to invoice remaining Stewards for their share of post-ISP supply chain costs (see below) and administrative costs. When SO's share becomes minimal, PCA and SO, subject to WDO approval, will enter into a final stage agreement relieving SO of the obligation for revenue management.

SUPPLY CHAIN/SERVICE PROVIDER/EXPENSE MANAGEMENT

Issue: The challenge for SO of continuing to operate a supply chain for PSF ISP materials after the transfer of the supply chain to PCA for the diminishing number of remaining PSF Stewards.

Solution: After the completion of the transfer of all supply chain obligations from SO to PCA relating to PSF ISP materials, PCA will provide supply chain services to SO, on a "one invoice" basis, in proportion to SO's market share, requiring minimal administrative effort by SO.

DESCRIPTION OF TRANSITIONAL PHASES OF STEWARD/REVENUE MANAGEMENT FOR SO AND PCA

Phase	Description	Supply chain	Revenue management
Phase 1	Pre ISP effective date	SO operates the entire supply chain for the entire pool of Stewards of PSF involving several hundred monthly transactions.	SO invoices full pool of Stewards of PSF for: <ul style="list-style-type: none"> Regular quarterly invoices
Phase 2	Immediate Post-ISP effective date	PCA assumes all supply chain obligations for PSF (municipal contracts, service provider contracts and incentives systems). SO contracts with PCA for supply chain services, PCA issues “one invoice” to SO based on remaining Stewards’ market share.	SO invoices full pool of Stewards of PSF for: <ul style="list-style-type: none"> final quarterly invoices 2015 true up including any residual bad debt/wind-down costs (or reserve for same) PCA – PSF Stewards report/remit fees to PCA
Phase 3	Later Post ISP implementation	PCA provides “one invoice” to SO each period for SO remaining Stewards’ share by market share of supply chain costs, diminishing as Stewards transfer to the ISP	SO - invoices remaining PSF Stewards for ongoing supply chain and SO administrative costs (Stewards who have joined the ISP are not responsible for administrative or operating costs of SO relating to post-ISP effective date). PCA - PSF Stewards report/remit fees to PCA
Phase 4	Final phase	When SO market share becomes minimal, PCA and SO enter into a final stage agreement relieving SO of their obligation for supply chain and revenue management	

PCA believes that this part of the transition plan addresses the remaining issues raised by SO in a manner that ensures that Stewards of both SO and PCA remain in full compliance with the WDA, and that established stewardship targets are met, which is the fundamental purpose of the WDA.

COMMUNICATION STRATEGY AND MATERIALS FOR TRANSITIONING TO THE NEW SYSTEM

Describe the expected communications strategy to communicate the transition from the existing system to the new system to key stakeholder groups.

PCA intends to continue consultation after the commencement of the PSF ISP with the stakeholder groups including Stewards, municipalities and service providers, as well as with consumers and regulators. The manner in which PCA would communicate with each stakeholder group depends upon the method of interface preferred by that stakeholder group. Methods of consultation could include written or oral communication, one-on-one and group meetings, committee meetings, and newsletters.

For municipalities, consultation would be accomplished by utilizing existing interfaces, such as the Municipal Waste Association MHSW committee, as well as the AMO and RPWCO committees. Communication would initially take place at the committee level, and then a record of the discussions would be provided by the committees to all participating municipalities to solicit further input. In addition, PCA will communicate directly with individual municipalities to better understand the circumstances and needs of that municipality. If appropriate for a particular issue, special committees would be established which may include stakeholders other than municipalities, such as Stewards or service providers.

PCA recognizes the importance of consumer awareness and participation for the success of the program. PCA is proposing to conduct an effective consumer information campaign, working where possible in partnership with municipalities, Stewards and with SO with respect to the remaining MHSW products. Furthermore, a detailed communication plan has been provided in the proposed PSF ISP and specific methods will be used to raise awareness of the program (e.g. program website, Point of Sale materials, purchased media, earned media, social media, etc.)

PCA will communicate directly with Stewards participating in the ISP program as it currently does with all other programs it manages. PCA will also continue consultation with relevant industry associations representing the Stewards including CCSPA, Canadian Fertilizer Institute, CropLife and RCC.

Because of the competitive nature of the role of the service providers, in general, discussions with regard to transportation and processing may take place with groups, or one-on-one.

SUMMARY OF THE PROPOSED TIMELINE FOR IMPLEMENTATION OF THE ISP

Provide a timeline (e.g. with a graphic) that includes key activities and dates for key announcements/decision points. Include activities proposed for before and after the ISP's consideration by the WDO board.

Under this ISP, the program will take effect on a date at least 3 months following the approval date (hereafter referred to as effective date); the effective date will be approved by Waste Diversion Ontario. For the purposes of these tables the transition period is assumed to be 3 months, however if a longer transition period is determined by WDO, the timelines will be adjusted accordingly.

Ontario ISP Development and Review Task List	Timeline AD - Approval Date ED - Effective Date
ISP Review Process/ WDO	
Submission of ISP and Transition Plan to WDO staff following completion of WDO consultation	AD - 30 days
Decision of WDO Board on PCA proposed ISP	AD
Stewardship Ontario	
Discuss PCA-Municipal ISP Agreement amendment and next steps	ongoing
Finalize strategy on recruiting effort until ED	ongoing
Joint Meeting with SO to communicate any outstanding obligations with SO to Stewards	AD 0-30 days
Stewards	
Finalization of budgeting and communication of draft fee schedule	ED - 90 days
Notification to all Stewards of steps required to formalize participation in PCA program, and wind down with SO program	ED - 60 days
Steward Registration and Reporting System goes live	ED- 60 days
Instructional webinar session for new Stewards	ED- 60days
Registration of initial pool of Stewards complete and PCA reports to WDO and SO on Stewards who are officially a part of the ISP as of the effective date	ED - 30
End of First reporting period for Steward	ED + 30 days
Stewards must have paid their first month invoice to PCA	ED + 60 days
Review of Program Operation Meeting with Stewards	ED + 180 days

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Municipalities	
Distribute amended PCA-Municipal ISP Services Agreements	ED - 90 days
Ongoing review of reporting and claims system	AD 0-30 days
Review of proposed reporting and claims system and supporting documentation requirements	AD 30-60 days
Consultation on supply chain transfer steps	AD 30-60 days
Webinar (if needed) with municipalities on PCA reporting system	ED - 30 days
Complete preparation for ISP effective date including: <ul style="list-style-type: none"> ✓ Reporting system registration ✓ Other transition step requirements 	ED - 30 days
Service Providers	
Ongoing review of reporting and claims system	AD 0-30 days
Communication to all service providers with regard to reporting claim mechanism	ED - 30 days
Consultation on supply chain transfer steps	AD 30-60 days
Webinar (if needed) with service providers on PCA reporting system	ED - 30 days
Complete preparation for ISP effective date including: <ul style="list-style-type: none"> ✓ Reporting system registration ✓ Other transition step requirements 	ED - 30 days