

**RPRA Consultation**

# **Municipal Hazardous or Special Waste (MHSW) Program Wind-Up Plan**

**Fall 2019**



# Asking Questions

01/29/2018 10:00 AM EST

This webcast has not yet started

## Questions and Answers

**Question** : test

Answer pending

Type a question and press 'Enter'.

To ask a question at any time during the presentation or for technical assistance, type your question in the text box and press "Enter".



**RPRA** Resource Productivity  
& Recovery Authority

# Agenda

- **Purpose of the Consultation**
- **About RPRA**
- **Background**
- **SO's Proposed MHSW Wind-Up Plan**
  - Governance and Administration
  - Financial Forecast, Fee Reduction and Residual Funds
  - Operations
  - Promotion and Education

# Purpose of the Consultation

- **Provide an overview of Stewardship Ontario's proposed Wind-Up Plan for the Municipal Hazardous or Special Waste (MHSW) Program**
- **Answer questions you have on the wind-up process**
  - If there is a question we cannot answer, we will follow up in writing
- **Outline key questions we are seeking feedback on during the consultation period**
  - You can provide your feedback to RPRA until **November 21, 2019**
  - At the end of the presentation we will explain how you can provide that feedback

# About RPRA



# The Resource Productivity and Recovery Authority

- Regulatory body created by the Ontario government to oversee Individual Producer Responsibility requirements
  - Compliance and enforcement responsibilities delegated by the province
- Mandated to support the transition to a circular economy and waste-free Ontario
  - Despite efforts, Ontario's diversion rates have stalled
  - New emphasis on Individual Producer Responsibility to drive better economic and environmental outcomes

# The RRCEA and WDTA

- RPRA receives its Authority from the *Resource Recovery and Circular Economy Act, 2016* (RRCEA) and the *Waste Diversion Transition Act, 2016* (WTDA)
- RRCEA establishes a new framework where producers are individually responsible and accountable for their products and packaging, recovering resources, and reducing waste
- WDTA allows for the continuation of waste diversion programs and sets out provisions to wind up those programs as directed by the Minister of the Environment, Conservation and Parks

A high-angle, top-down view of a person walking on a wooden spiral staircase. The person is wearing a dark hat and a light-colored top. The staircase is made of light-colored wood and curves around a central point. The background is a light-colored wall with a grid pattern.

# **Our Vision**

**A circular economy today  
for a waste-free tomorrow.**

# **Our Mission**

**Enforce producer responsibility and advocate for  
the circular economy to spur innovation and  
protect the environment.**

# What We Do

Under the **WDTA**, our responsibilities include:

- Overseeing existing waste diversion programs and industry funding organizations until wind up
  - **Used Tires Program** [*Concluded December 31, 2018*] operated by Ontario Tire Stewardship
  - **Waste Electrical and Electronic Equipment Program** operated by Ontario Electronic Stewardship
  - **Municipal Hazardous or Special Waste Program** operated by Stewardship Ontario
  - **Blue Box Program** operated by Stewardship Ontario
- Approving wind-up plans developed by Industry Funding Organizations
- Monitoring the execution of wind-up plans



# What We Do

Under the **RRCEA** our responsibilities include:

- Developing and operating a registry to register and receive information from obligated parties responsible for materials under the RRCEA
- Managing, analyzing and reporting on the information in the registry
- Carrying out compliance and enforcement activities



# Background



# MHSW Program

- The Municipal Hazardous or Special Waste (MHSW) Program is operated under the authority of Ontario's *Waste Diversion Transition Act, 2016* (WDTA)
- The program is designed to collect certain hazardous and special wastes and ensure they are managed in an environmentally responsible way at end of life
- MHSW materials include:
  - **single-use batteries**
  - **pressurized containers**
  - **oil containers**
  - **oil filters**
  - **antifreeze**
  - **paints and coatings**
  - **pesticides**
  - **solvents and**
  - **fertilizers**

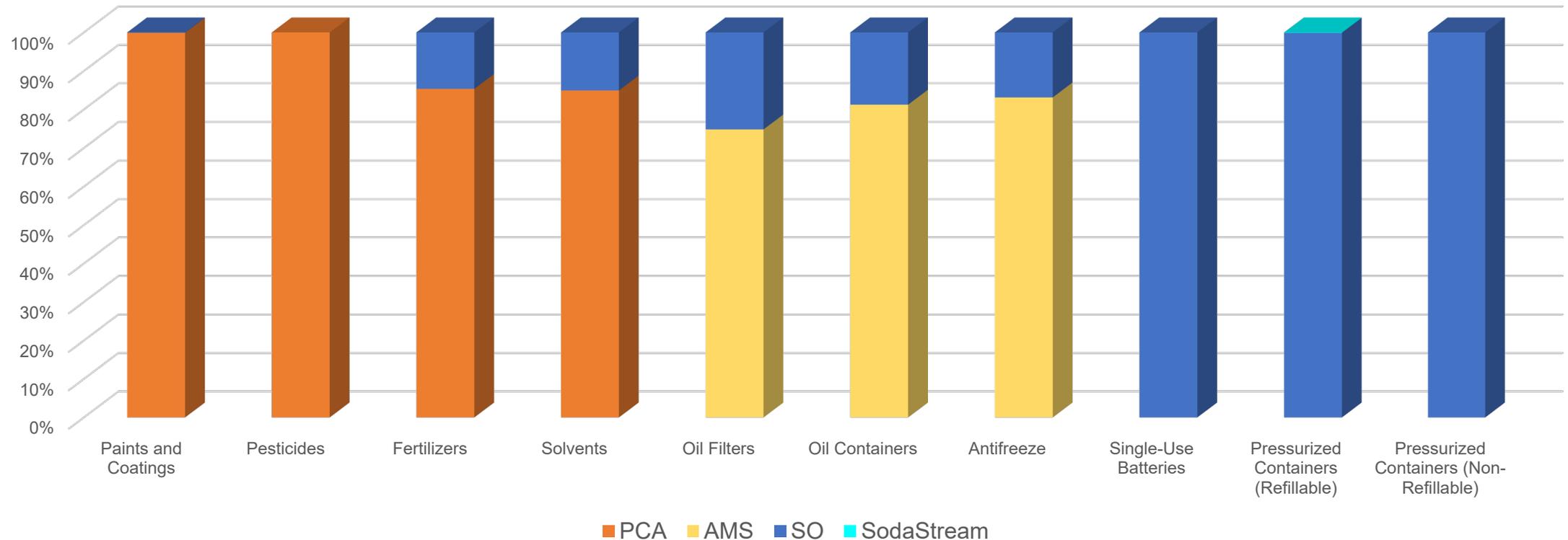


# Industry Funding Organization (IFOs) and Industry Stewardship Organizations (ISOs)

- Under the *Waste Diversion Transition Act, 2016* (WDTA), **Stewardship Ontario (SO)** continues to be responsible for operating the MHSW program
- The Act also permits management of such materials by ISOs
  - **Product Care Association (PCA)**: approved to manage paints & coatings in July 2015 and pesticides, solvents and fertilizers (PSF) in April 2016
  - **Automotive Materials Stewardship (AMS)**: approved to manage oil filters, oil containers, antifreeze and antifreeze containers in April 2017
  - **SodaStream**: approved manage their own of proprietary pressurized containers in July 2016
- SO continues to operate battery and pressurized container programs
- SO continues to represent a small number of stewards in some of the other MHSW categories managed by the ISOs

# Industry Funding Organization (IFO) and Industry Stewardship Organizations (ISOs)

Percentage of Material Managed by each MHSW Program Operator  
*(\*based on collected tonnes as reported in 2018 Annual Reports)*

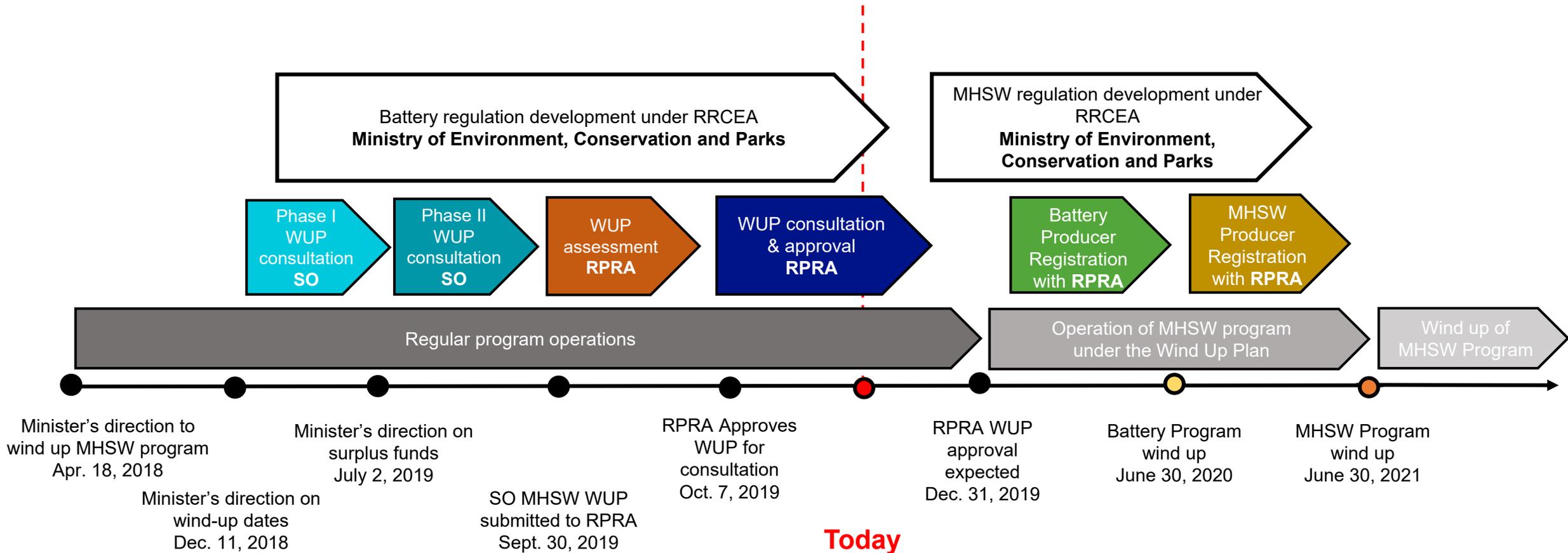


# MHSW Wind-Up Plan (WUP) Development and Approval

## Evaluation Criteria

- Stewardship Ontario's proposed MHSW Wind-Up Plan must be compliant with the WDTA and consistent with the Minister's directions
- The Plan is also assessed against requirements of the Authority's Wind-Up Guide, a non-binding document to provide guidance to IFOs in the development of wind-up plans
- The purpose of the consultation is to get feedback from stakeholders on the plan, and inform the Authority's decision making
- Final approval of the Plan will be made by the Authority

# MHSW Wind-Up Plan (WUP) Development and Approval Timelines



# Minister's Direction to Wind Up the MHSW Program

**The plan should be consistent with the following principles**

- **Demonstrate transparent communications and meaningful consultation**
- **Support competition and prevent conflict of interest**
- **Demonstrate fairness to stewards and protect consumers**
- **Maintain and improve program performance**

# Minister's Direction to Wind Up the MHSW Program

## Surplus Funds

- The July 2019 direction to SO required that the wind-up plan include a proposal to return surplus funds to Ontario consumers of municipal hazardous or special material (MHSM)

<b>Material Categories</b>	<b>Ministerial Direction</b>
<b>MHSM categories whose recovery is managed by SO (single-use batteries and pressurized containers)</b>	“(...) direction that the proposal will set out rules governing a fee elimination during the wind-up period. I expect that consumers will benefit from this direction through the elimination of any consumer fees of through reduced product cost.”
<b>MHSM categories that are managed through industry stewardship plans (paint and coatings, pesticides, solvents, fertilizers, antifreeze, oil filters and oil containers)</b>	“(...) the proposal include options to return surplus funds to MHSM consumers; for example, through a consumer rebate option.”

- SO to include a proposal to deal with any residual funds (remaining) after the proposal to return surplus funds to consumers has been implemented and concluded.

# What's Changing?

## Going from:

*Waste Diversion Transition Act, 2016 (WTDA)*

### **Shared Producer Responsibility**

Stewards/producers collectively responsible for the end-of-life management of batteries and MHSW

A system centrally managed by SO and ISPs

## To:

*Resource Recovery and Circular Economy Act, 2016 (RRCEA)*

### **Individual Producer Responsibility (IPR)**

Stewards/producers individually responsible for the end-of-life management of batteries and other MHSW to incent competition and innovation and increase accountability

A system managed by multiple competing producer responsibility organizations (PROs), and/or producers managing their own products



# What's Changing?

## Going from:

A supply chain operated according to the IFO's Program Plan and Industry Stewardship Plans (ISPs)

IFO and ISPs collect system data and the Authority oversees MHSW program operators (SO, PCA, AMS, SodaStream)

## To:

Supply chain operated without an approved Program Plan or Industry Stewardship Plans (ISP)

Supply chain will be managed according to commercial negotiations between producers, PROs and service providers within the parameters of a new regulation

The Authority collects system data through a secure registry to enforce individual producer compliance



## **Key Questions – About Us and Background**

***Do you have any questions regarding the role of the Authority?***

***Do you have any questions or comments regarding the wind-up plan's evaluation criteria, its timelines or the Minister's direction?***



# Stewardship Ontario's (SO) Wind-Up Plan for the Municipal Hazardous or Special Waste (MHSW) Program



# Governance and Administration



# Conflict of Interest Mitigation

## Minister directed in wind-up letter that:

- “SO shall take all necessary steps to ensure there is no real, potential or apparent conflict of interest when developing and implementing the plan.”

## Potential concerns identified:

- Canadian Stewardship Services Alliance (CSSA) administers the SO MHSW Program through a service agreement with SO
- CSSA may have an operational role under the RRCEA after wind up
- SO and CSSA Boards had significant cross representation

## Conflict of Interest Mitigation Plan:

- The Authority required that SO develop and implement a Conflict of Interest Mitigation Plan and that this plan be implemented prior to wind up

# SO MHSW Conflict of Interest Mitigation Plan

## Board Governance

- SO amended Board Code of Conduct by-law to define “overlapping directors”
- SO directors who are also directors of the CSSA or AMS (defined as “overlapping directors”) or whose company has a future expectation of operating as a service provider under the RRCEA with respect to MHSW materials, are not permitted to participate in decisions regarding the MHSW Program or the wind up of the MHSW Program
- Board members are required to disclose any potential conflict of interest related to the Board’s review of MHSW Program decisions and will be required to recuse themselves from those decisions



# SO MHSW Conflict of Interest Mitigation Plan

## MHSW Executive Committee

- In **November 2018**, SO established an MHSW Executive Committee (chaired by an independent director) to:
  - Oversee the development and execution of the MHSW Wind-Up Plan
  - Ensure delivery of MHSW operations during Wind-Up period
  - Provide direction on MHSW financial matters
- The MHSW Executive Committee is comprised of directors whose businesses are not involved in or obligated under the MHSW Program
- SO appointed an MHSW program manager to report directly to the MHSW committee and lead a team of independent consultants (accounting, legal and policy advisors) engaged to work on the wind-up project



# SO MHSW Conflict of Interest Mitigation Plan

## Administration

- CSSA Executives are not responsible for MHSW wind up decisions as per new reporting structure
- SO and CSSA staff involved in program administration are prohibited from engaging in activity or directly or indirectly benefitting from their position or connections as employees in situations that constitute or have the appearance of a conflict of interest
- SO - CSSA service agreement prohibits the disclosure of confidential information and restricts its usage to that reasonably required to exercise duties under the agreement



# SO MHSW Conflict of Interest Mitigation Plan

**Since submitting the MHSW WUP, SO has further strengthened their conflict of interest plan in preparation for the wind up of the Blue Box Program by creating the SO Wind-Up Team and has taken or will take the following actions:**

- All cross appointments between the SO and CSSA boards have been eliminated; no common directors between the organizations
- CSSA/SO Board Chair has resigned and a new SO Board Chair has been elected
- New SO Executive Director and Board Secretary has been appointed
- MHSW Executive Committee is no longer required and SO Wind-Up Team now reports directly to the SO Executive Director
- Segregated workspace will be constructed for the SO Wind-Up Team, SO staff and CSSA staff providing services to SO



# SO MHSW Conflict of Interest Mitigation Plan

*Stewardship Ontario Management Team Effective November 1, 2019*

- ➔ Executive Director, Gemma Zecchini
- ➔ Blue Box & MHSW Program Officer, Lyle Clarke
- ➔ Chief Financial Officer, Jane Mackenzie
- ➔ Project Manager MHSW, Tina Caputo
- ➔ Project Manager Blue Box, Susie Minchella
- ➔ Communications Manager – *Pending*



# SO MHSW Conflict of Interest Mitigation Plan

## Data Management – Steward Access to Data

- Stewards will have access to their historic submission data through the WeRecycle steward reporting web portal until program termination
- Following program termination, steward data will no longer be accessible through the portal
- SO proposes to give MHSW stewards at least 45-days notice regarding the anticipated change in accessibility



# SO MHSW Conflict of Interest Mitigation Plan

## Data Management – Transfer of Data to RPRA

- All MHSW program data will be transferred to the Authority in digital format with measures implemented to maintain data security throughout the transfer process
- Confidential or commercially sensitive information will be identified so that the Authority can take steps to ensure secure data storage and protection of such information
- Historic program data will be in the Authority's possession and future access to this data will be subject to the Authority's Access and Privacy Code
- Only MHSW program data required for tax and legal purposes will be retained until no longer required, at which point the process of destroying the data from active and back-up access points will begin with a final attestation provided to the Authority once the destruction process is complete



## **Key questions – Governance and administration**

***Do you have any feedback on the proposed Conflict of Interest Plan contained within SO's MHSW Wind Up Plan? Does the proposal support competition and prevent conflict of interest?***

***Do you have any feedback on the plan for the management of MHSW program data leading up to and following the wind up?***



# Financial Forecast, Fee Reduction and Residual Funds



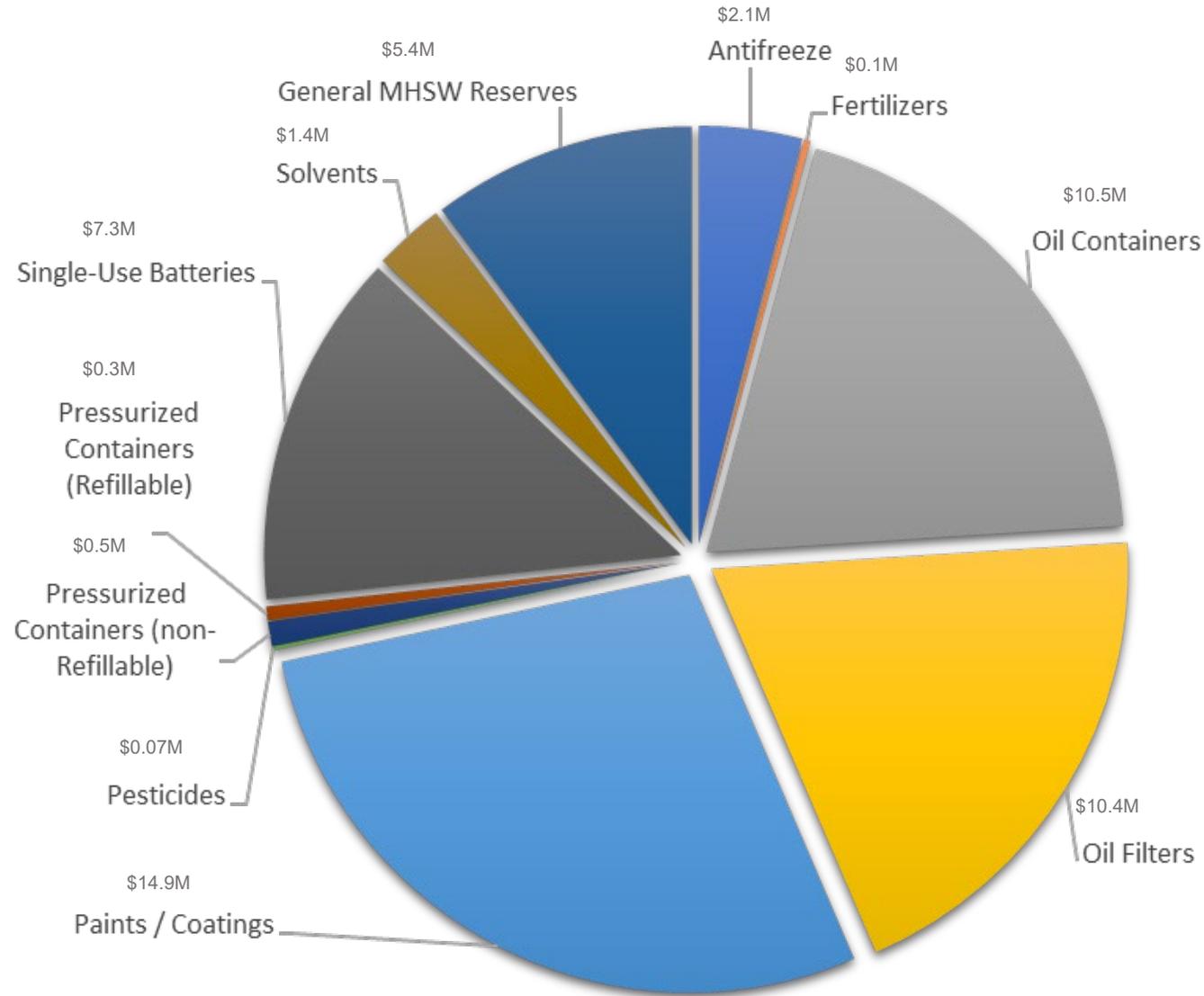
# Background – CRA HST Refund and Impact on Reserves

- In April 2018, a CRA judgement related to the ability for SO to claim Input Tax Credits (ITCs) between 2011 to 2017, resulted in a **\$29.4M** HST refund
- The CRA ruling increased SO's reserves for the period ending December 2018 to **\$53.1M**
- Reserves are allocated to specific material categories
- MHSW material category reserves are distributed according to contributions by stewards throughout the course of the MHSW Program

# MHSW Reserves by Material Category (as of December 2018)

	Accumulated Operating Surplus (Excluding HST Adjustment)	HST ITC Adjustment	Deferred Revenue (2012)	Total Reserve Estimate December 2018
Antifreeze	\$316	\$1,267	\$527	\$2,110
Fertilizers	\$33	\$94	\$5	\$132
Oil Containers	\$3,668	\$6,111	\$715	\$10,494
Oil Filters	\$1,622	\$6,062	\$2,688	\$10,372
Paints/Coatings	\$4,648	\$7,145	\$3,141	\$14,934
Pesticides	-\$43	\$101	\$11	\$69
Pressurized Containers (Non-Refillable)	-\$413	\$818	\$110	\$515
Pressurized Containers (Refillable)	\$127	\$159	\$2	\$288
Single-Use Batteries	\$419	\$4,974	\$1,903	\$7,296
Solvents	\$734	\$676	\$37	\$1,447
<b>Total Reserves Allocated by Material</b>	<b>\$11,111</b>	<b>\$27,407</b>	<b>\$9,139</b>	<b>\$47,657</b>
MHSW General Unrestricted Reserves	\$1,360	\$1,969	\$0	\$3,329
MHSW Portion of Sustaining Fund	\$2,100	\$0	\$0	\$2,100
Total Unallocated Reserves	\$3,460	\$1,969	\$0	\$5,429
<b>Total MHSW Reserve Estimate</b>	<b>\$14,571</b>	<b>\$29,376</b>	<b>\$9,139</b>	<b>\$53,086</b>

# MHSW Reserves by Material Category (as of December 2018)



## MHSW WUP Financial Forecast 2019 - 2021 (in \$000)

	2019	2020	2021
<b>Estimated Reserves Beginning of Year</b>	<b>53,086</b>	<b>\$48,728</b>	<b>\$22,035</b>
Estimated Revenue	\$13,758	\$5,086	\$939
Program Operating Expenses			
Direct Material Costs	\$13,110	\$8,773	\$1,792
Administration	\$3,560	\$3,057	\$2,325
Sub-Total	\$16,670	\$11,830	\$4,117
Operating Surplus/Deficit	-\$2,912	-\$6,744	-\$3,178
Estimate MHSW Wind Up Costs	-\$1,446	-\$2,681	-\$3,165
ISP Fee Reduction		-\$17,268	-\$15,319
<b>Estimated Reserves End of Year</b>	<b>\$48,728</b>	<b>\$22,035</b>	<b>\$373</b>
General Reserve Drawdown	\$1,446	\$1,681	\$2,302
Material Reserve Drawdown	\$2,912	\$25,012	\$19,358

# Minister's Direction Regarding Surplus Funds

- Due to the large amount held by SO in reserves, the Minister issued a direction to SO to return surplus funds to Ontario consumers of municipal hazardous or special materials (MHSM)
- Furthermore, the materials managed by Stewardship Ontario and the Industry Stewardship Organization (ISOs) received specific directions

Material Categories	Ministerial Direction
<b>MHSM categories whose recovery is managed by SO (single-use batteries and pressurized containers)</b>	“(...) direction that the proposal will set out rules governing a fee elimination during the wind up period. I expect that consumers will benefit from this direction through the elimination of any consumer fees or through reduced product cost.”
<b>MHSM categories that are managed through industry stewardship plans (paint and coatings, pesticides, solvents, fertilizers, antifreeze, oil filters and oil containers)</b>	“(...) the proposal include options to return surplus funds to MHSM consumers; for example, through a consumer rebate option.”



# Options Considered to Manage Surplus Funds

## Categories whose recovery is managed by SO (single-use batteries and pressurized containers)

1. **Fee Elimination:** SO reduces MHSW steward fees for single-use batteries and pressurized containers for a specified period of time in each related MHSW category
2. **Fee Reduction:** SO reduces MHSW steward fees over a longer period – exact level of final fee reduction based on final program financial reconciliations and completed steward supply reports

## Categories that are managed through ISPs (paint and coatings, pesticides, solvents, fertilizers, antifreeze, oil filters and oil containers)

SO considered and consulted on four options to return surplus funds to consumers:

1. **Fee elimination/reduction for ISP materials**
2. **Rebate consumers that purchase MHSW**
3. **Rebate consumers that return MHSW materials for recycling**
4. **Implement a single general MHSW consumer rebate through various awareness initiatives**



# Proposal – Fee Reduction to SO Stewards and ISO Members

- SO proposes to return surplus funds to MHSM consumers through the implementation of a fee reduction for both SO stewards and ISO members during the wind-up period
- SO believes that this proposal achieves the following objectives:
  - **Enables the consistent treatment of all MHSW program participants**
  - **Represents the most efficient way to ensure that the disbursement of surplus funds will benefit consumers**
  - **Minimizes the administrative costs associated with disbursement of surplus funds**
  - **Maximizes the aggregate level of disbursed funds which minimizes the level of residual funds left in the program following termination**
  - **Flexibility to adjust the amount of the final fee reduction based on most current financial and operational information**
- SO asserts that the competitive market dynamic associated with the sale of MHSM materials should result in cost savings being passed onto related consumers



# Proposal – Fee Reduction Mechanics

- SO is proposing to apportion surplus funds held in each material specific reserve as a reduction to steward invoices during the final quarters of the program
- The duration of fee reduction (number of quarters) varies based on surplus amount and operating cost associated with the management of each type of material
- SO steward invoices would indicate the amount of the program costs (i.e. what would normally be billed to the steward) and the amount of the fee reduction associated with the reserve drawdown in addition to the amount the steward would be required to pay.
- SO proposes to implement the fee reduction for ISP members through separate service agreements with the ISOs (AMS and PCA) that establish terms for:
  - **Data sharing**
  - **How to document the process**
  - **How to resolve disputes**
  - **Require that any fee reductions paid for by SO benefit or are passed onto to ISP members.**



# Proposal – Fee Reduction Communications

<b>Stakeholders Involved in the Sale of MHSM</b>	<b>Method of Communication</b>	<b>Communication Goal</b>
<ul style="list-style-type: none"><li>• SO Stewards</li><li>• ISO Members</li><li>• MHSM Wholesalers</li><li>• MHSM Retailers</li></ul>	<ul style="list-style-type: none"><li>• Email Blasts</li><li>• Website Posts</li><li>• Targeted Webinar Sessions</li></ul>	<p>Ensure that all stakeholders involved in the sale of MHSM are fully aware of:</p> <ul style="list-style-type: none"><li>• The process by which fees will be reduced for SO stewards and ISO Members</li><li>• The anticipated timing of implementation of the fee reductions and</li><li>• The estimated level of the fee reduction per MHSW category</li></ul>



# Proposal – Residual Funds

- Any residual funds that remain in the program following the resolution of outstanding program financial obligations, are proposed to be transferred to the Authority to help offset registry-related costs under the RRCEA framework in relation to various MHSW material categories
- Using SO's residual funds to offset the Authority's registry-related expenses will lower registry fees recoverable from producers, thereby reducing the cost that producers pass on to consumers under the RRCEA

## *MHSW Residual Fund Forecast (\$000)*

Antifreeze	\$55
Fertilizers	\$5
Oil Containers	\$87
Oil Filters	\$58
Paints/Coatings	\$53
Pesticides	\$5
Solvents	\$9
Pressurized Containers (Non-Refillable)	\$44
Pressurized Containers (Refillable)	\$33
Single-Use Batteries	\$27
<b>Residual Funds at program Termination</b>	<b>\$376</b>



# **Key questions – Financial Forecast, Fee Reduction and Residual Funds**

- *Do you have any comments or feedback regarding:*
- *The proposal to return surplus funds to MHSM consumers through the implementation of a fee reduction to SO stewards and ISO members?*
- *The proposal to transfer remaining MHSW residual funds to the Authority to offset registry-related expenses and ultimately lower producer registry fees?*



# Operations



# Operations: Service Providers



# Proposal – Stewardship Ontario Program Operation

## Single-Use Batteries and Pressurized Containers

- No changes to service provider claims procedures, incentive payments or contractual terms prior to the MHSW Program termination date
- No changes to MHSW material definitions
- All MHSW materials will continue to be collected, transported, processed and recycled in accordance with current program standards and performance metrics up until **June 30, 2021** (or **June 30, 2020** in the case of single-use batteries).



# Proposal – Municipal Collectors

## Single-Use Batteries and Pressurized Containers

- SO proposes to continue to pay municipalities for depot hours and collection events in relation to single-use batteries until **June 30, 2020** and pay for depot hours and collection events for other MHSW materials until **June 30, 2021**.
- Municipalities would receive payments pursuant to the same payment schedule as they currently receive.
- Municipalities must submit event claims no later than two months after the program termination dates (**August 31, 2020** for single-use batteries and **August 31, 2021** for pressurized containers).
- SO will work with municipalities to amend existing agreements to reflect the different termination dates for single-use batteries and other MHSW materials.



# Summary of Key Dates – Service Providers

<b>Single-use battery cut-off dates</b>	
<b>June 30, 2020</b>	Single-use Battery program termination date: <ul style="list-style-type: none"> <li>• Materials collected by this date eligible for transportation and processing incentives;</li> <li>• Municipalities eligible for single-use battery related incentives re depot hours and collection events.</li> </ul>
<b>July 15, 2020</b>	Deadline for pick-up of single-use batteries collected by June 30
<b>August 31, 2020</b>	Deadline for: <ul style="list-style-type: none"> <li>• Submission of municipal claims for single-use battery related incentives (final submission);</li> <li>• Submission of service provider claims for battery incentives (final submission);</li> </ul>
<b>MHSW cut-off dates</b>	
<b>June 30, 2021</b>	MHSW material program termination date (excluding single-use batteries): <ul style="list-style-type: none"> <li>• Materials collected by this date eligible for transportation and processing incentives;</li> <li>• Municipalities eligible for incentives re depot hours and collection events</li> </ul>
<b>July 15, 2021</b>	Deadline for pick-up of MHSW collected by June 30 (excluding single-use batteries)
<b>August 31, 2021</b>	Deadline for: <ul style="list-style-type: none"> <li>• Submission of municipal claims for incentives (final submission);</li> <li>• Submission of service provider claims for incentives (final submission);</li> </ul>



# Proposals – Audit and Review Activities

## Service Providers Claims

- SO proposes to continue with current service provider monitoring throughout the wind-up period
- As the wind-up date approaches, SO anticipates that volumes of materials collected and processed may change, which will require the careful monitoring of final service provider claims submissions and the initiation of review procedures to confirm materials collected are consistent with program standards



# Service Providers – Post-Wind Up

## All MHSW Materials

- All material collected **AFTER** the MHSW program termination dates (**June 30, 2020** for single-use batteries and **June 30, 2021** for all remaining MHSW materials) would be subject to the requirements of the RRCEA and the associated regulations
- If service providers wish to continue to participate in the MHSW program under the RRCEA, new agreements will need to be established to define terms for collection, transportation and processing of material
- It is anticipated that PROs for Batteries and MHSW materials will register with the Authority in advance of the program wind up



# Proposal – ISP Agreements

## Paint and Coatings, Pesticides, Solvents, Fertilizers, Automotive Materials

MHSW Material	ISO	Program Agreement Amendments
Antifreeze Oil Containers Oil Filters	AMS	<ul style="list-style-type: none"><li>• SO to extend its current agreements with each ISO to align with the MHSW Program wind up termination date (<b>June 30, 2021</b>)</li><li>• SO will follow the current process and arrangements with the ISOs and purchase SO steward's share of quarterly costs in each material category based on estimates of proportionate share of total supplied quantities of MHSM to the Ontario market</li></ul>
Pesticides Solvents Fertilizers	PCA	<ul style="list-style-type: none"><li>• SO to follow the existing invoicing and payment process until program termination</li></ul>
Paint and Coatings	PCA	<ul style="list-style-type: none"><li>• SO proposes to explore the possibility of adding paints and coatings to its existing supply agreement with PCA (covering PSF categories) during the wind-up period.</li><li>• SO will continue to purchase credits on behalf of its registered stewards from PCA until program termination</li></ul>



# Key question – Service Provider Operations

*Are the service provider cut-off dates proposed by Stewardship Ontario reasonable?*

# Operations Stewards



# Summary of Key Dates for Steward Reporting and Payment

<b>Single-use battery cut-off dates</b>	
<b>May 31, 2020</b>	Deadline for single-use battery stewards to submit 2019 supply report adjustments
<b>June 30, 2020</b>	Single-use Battery program termination date
<b>August 31, 2020</b>	Deadline for: <ul style="list-style-type: none"> <li>• Submission of single-use battery steward supply report adjustments for 2020;</li> </ul>
<b>Oct 31, 2020</b>	<ul style="list-style-type: none"> <li>• Deadline for steward payment of final Stewardship Ontario invoice – sent September 30, 2020 Due 30 days after receipt</li> </ul>
<b>MHSW cut-off dates</b>	
<b>May 31, 2021</b>	Deadline for other MHSW stewards (excluding single-use batteries) to submit 2019-2020 supply report adjustments
<b>June 30, 2021</b>	MHSW material program termination date (excluding single-use batteries)
<b>August 31, 2021</b>	Deadline for: <ul style="list-style-type: none"> <li>• Submission of steward supply report adjustments for 2021;</li> </ul>
<b>Oct 31, 2021</b>	<ul style="list-style-type: none"> <li>• Deadline for steward payment of final Stewardship Ontario invoice – sent September 30, 2021 Due 30 days after receipt</li> </ul>



# Proposals – Audit and Review Activities

## Steward Supply Reports

- SO proposes continue to follow its current steward compliance audit framework for selecting stewards to audit throughout 2019 and 2020
- As program termination dates get closer, SO proposes to limit random steward audits and focus resources on ensuring steward compliance with program termination reporting deadlines and requirements



# Key question – Steward operations

*Does Stewardship Ontario's proposed final steward reporting schedule and process align with your business operations?*



# Promotion and Education



# Proposal – Orange Drop Website and Branding

- SO to continue to use Orange Drop branding and website functions as the consumer-facing brand of the MHSW Program throughout the wind-up period
- SO to operate the Orange Drop website for six months after program termination (\*this transition period would last for 18 months for single-use batteries)
- During the transition, the Orange Drop website would direct consumers to new sources of information on the proper disposal of MHSW materials
- Following this transition period, SO to transfer the legal title of Orange Drop and its website domain name to the Authority

# Proposal – Orange Drop Website and Branding

- SO to continue the current promotion and education awareness programs throughout the wind-up period to ensure that program performance is not adversely affected by a slow down of these activities
- Promotion and education activities represented approximately four per cent of Stewardship Ontario MHSW Program expenses in 2018; a similar level of spending is being proposed for 2019 and 2020
- Promotion and education activities will cease on **June 30, 2021**

## **Key question – Promotion and Education**

***Do you support the transfer of the ownership of the Orange Drop website and branding to the Authority?***

***Would you support the Orange Drop branding being made available to Producer Responsibility Organizations (PROs) and producers?***

***Do you feel that PROs may need access to the Orange Drop website and branding prior to the wind-up dates?***



## **Key question – General Feedback on the WUP**

***Is there enough information in the wind-up plan for you to prepare for the wind up of the program?***

***Please provide any feedback you may have regarding the MHSW Wind Up Plan's efforts to meet the requirements of the various Minister's directions?***



## Next steps

- You may provide your feedback on SO's MHSW Wind-Up Plan by:
  - Emailing your comments to [consultations@rpra.ca](mailto:consultations@rpra.ca)
  - You will receive an email from RPRA that includes a link to this presentation, the audio, and a survey on the consultation process
- Stakeholder feedback is due by **November 21, 2019**
- Feedback from the consultation will be summarized in a report that will be available on the Authority's website
- RPRA and SO will provide information on proposed regulations as soon as information becomes available from the Ministry of Environment, Conservation and Parks

