

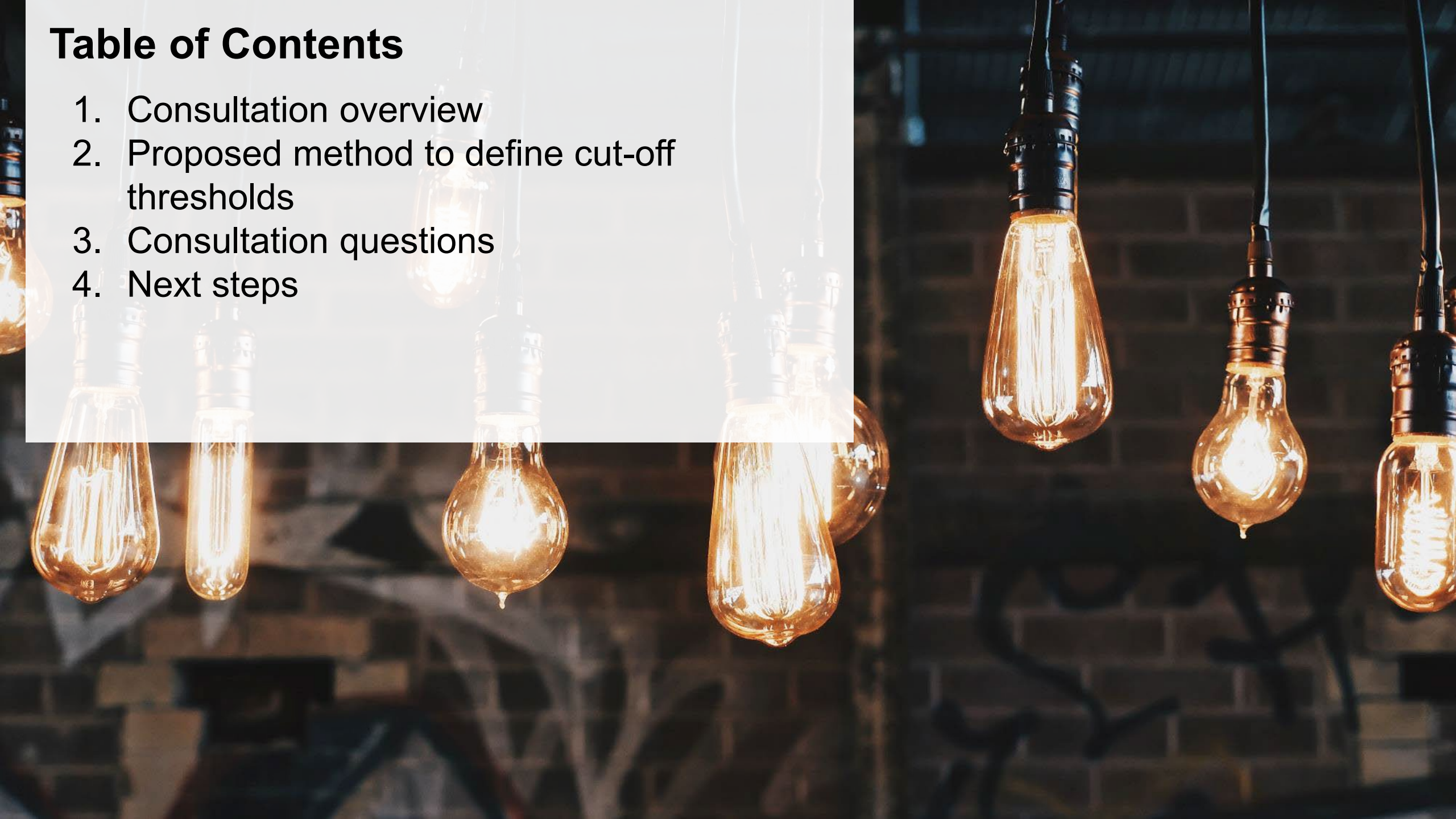
Defining large and small lighting producer categories for supply data verification

Consultation period:
April 22 to May 30, 2025



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Consultation overview



Purpose of the consultation

Beginning in 2025, only large lighting producers are required to submit a supply data verification report to RPRA. Small producers will no longer be required to submit a verification report but will be subject to inspections. However, all producers that enter the market after 2025 are also expected to submit a verification report to RPRA validating the reported supply data.

RPRA is revising the existing Lighting Supply Data Verification Procedure to include the cut-off thresholds that determine if a producer is considered large or small in terms of supply data verification reporting. Starting in 2025, producers will use the cut-offs every year to determine if they are required to submit a supply data verification report.

Note: For the 2025 reporting period and onwards, cut-off thresholds are only applicable to producers who submitted both their supply data report and supply data verification report in 2024. Producers who failed to submit their supply report and/or supply data verification report in 2024 are still required to submit a verification report, regardless of if they are considered small.

Objectives and principles of this consultation

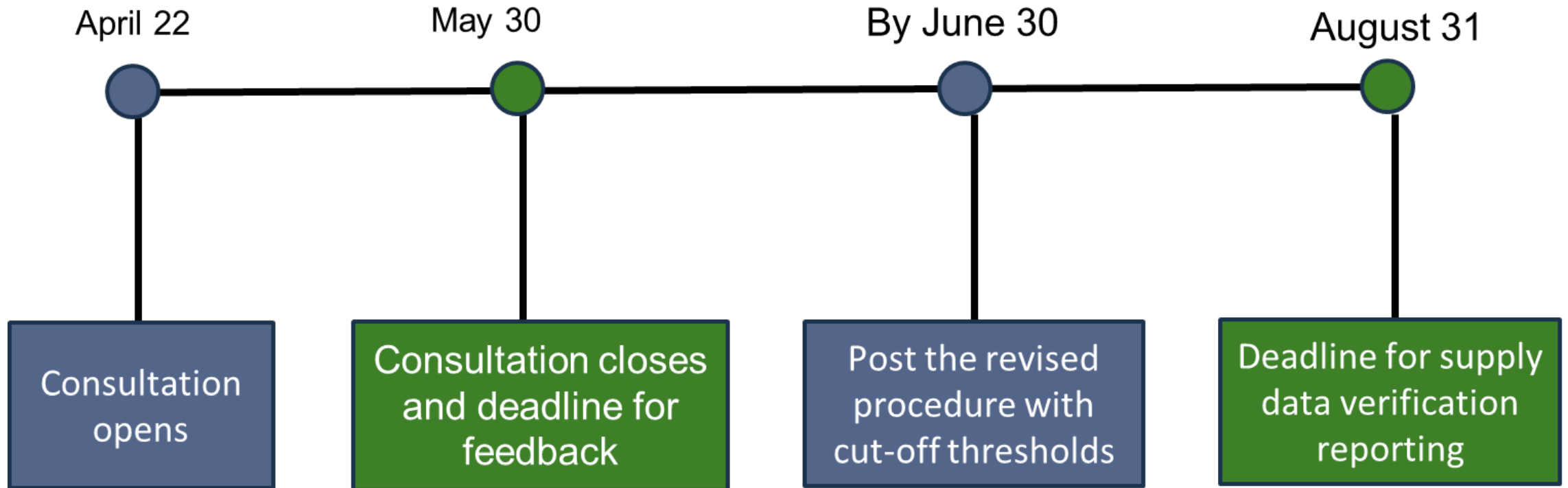
Objectives

- To provide RPRA with different producer size categories (i.e., large and small) for supply data verification reporting in 2025 and onwards
- Supporting producers to meet their supply data and supply data verification reporting requirements with reduced administrative burden on producers

Principles

- Producers meet their regulatory requirements
- Ensure that the Lighting Supply Data Verification Procedure is clear and straightforward to maximize compliance
- Ensure a level playing field in terms of accuracy and completeness of reporting

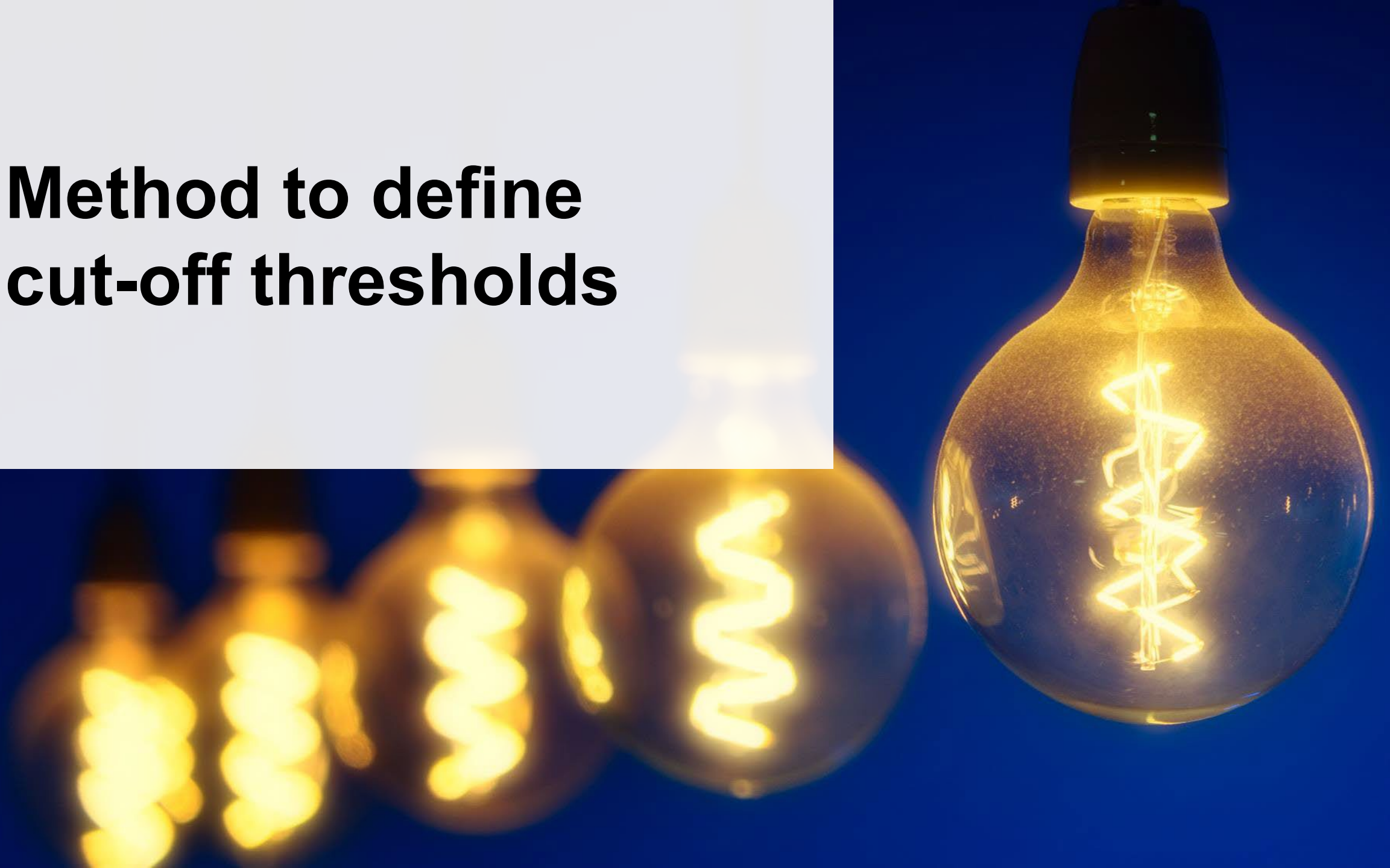
Consultation timeline



Reporting requirements and decisions made prior to this consultation

- Under the Electrical and Electronic Equipment (EEE) Regulation, producers of lighting are required to report supply data of obligated material each year in order to establish their management requirement for the following year. Supply data must be reported in accordance with the Lighting Verification and Audit Procedure.
- In 2023/2024, RPRA consulted on the principles and methodologies outlined in the Lighting Verification and Audit Procedure. In addition to determining that only large producers will be required to submit a verification report beginning in 2025, RPRA made the following decisions based on feedback received:
 - All lighting producers were required to submit a one-time supply data verification report to RPRA in 2024 (the first verification reporting year), and
 - To consult on two producer categories (i.e., large and small) after receiving 2024 verified supply data from lighting producers.

Method to define cut-off thresholds



RPRA's proposed methodology for defining producer cut-off thresholds

RPRA proposes that producers will use their last three years' average supply weight from the previous reporting period to define if they are a small or large producer. This proposed cut-off would provide RPRA with a statistically acceptable level of confidence based on the completeness and accuracy of the supply data.

The average weight of supply is calculated using the weight of lighting supplied in Ontario three, four and five years prior.

$$\text{Average weight of lighting supply} = (Y3 + Y4 + Y5) / 3$$
$$\text{Eg. 2025 average weight of supply} = (2022 + 2021 + 2020) / 3$$

RPRA will periodically review the cut-off thresholds to ensure they accurately reflect the producer categories.

RPRA's proposed methodology for defining producer cut-off thresholds

Producer cut-off threshold	Percentage of producers	Percentage of aggregate supply weight
Large \geq 90,000 kg	10%	75%
Small $<$ 90,000 kg	90%	25%
Total	100%	100%

Advantages of this approach

- Producers only need to take their average supply weight of the last three reporting periods into consideration when determining if they are categorized as small or large.
- The proposed cut-off reduces the administrative burden from 90% of lighting producers who will **not be required** to submit a verification report.
- The calculation method is easy to follow. Taking the average supply of three years would avoid data fluctuations in a particular year.

Consultation questions



Consultation questions

RPRA encourages lighting producers to provide written feedback on the following questions:

- 1) Are there additional methods that RPRA should consider? If so, why?
- 2) The proposed cut-off thresholds capture 75% percentage of aggregate market supply weight. Is this acceptable or should we consider cut-offs that capture a different percentage of supply?

Next Steps



Next steps

Answers to the questions on slide 12 and additional feedback can be submitted to consultations@rprra.ca

For more information on the consultation, visit the consultation webpage

The deadline to submit your feedback to RPRA is May 30, 2025

Note: A communication will be sent to all lighting producers once the producer categories for supply data verification reporting are finalized and the revised Lighting Supply Data Verification Procedure is posted.