

General Fee Setting Policy Consultation Report – Round 1

October 31, 2017

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Purpose & Context

This report summarizes stakeholder input received during consultations held by the Resource Productivity and Recovery Authority (the Authority or RPRA) to develop its General Fee Setting Policy, which will guide how the Authority will set fees related to its activities under the *Resource Recovery and Circular Economy Act, 2016* (RRCEA).

The Authority has duties and powers under the RRCEA and the *Waste Diversion Transition Act, 2016* (WDTA).

Specifically, the Authority's duties and responsibilities include:

- Building and operating a registry to:
 - Register the companies with obligations under the RRCEA
 - Receive and manage information to support progress to a circular economy
- Overseeing current waste diversion programs operated by industry funding organizations (IFOs), and their wind up, as per the Minister's directions under the WDTA
- Overseeing current waste diversion programs operated by industry stewardship organizations (ISOs)
- Exercising its compliance and enforcement powers

The Authority is a not-for profit, non-Crown organization and receives no government funding. As a self-funded organization it must recover its operating costs from the parties regulated under the Acts. RPRA is required under the legislation to consult stakeholders before it can establish or amend fees and publish a report.

RPRA completed the first round of consultations on its General Fee Setting Policy on October 4 and 5, 2017. This consultation report provides a summary of the first round of consultations.

Approach to General Fee Setting Policy Consultations & Timelines

The Authority is required under [Section 41 of the RRCEA](#) to consult stakeholders before it can establish and set fees. Through the consultation process RPRRA is seeking feedback in the development of its General Fee Setting Policy, which will inform how the Authority will establish fees to support its RRCEA-related costs. The first fees to be established will be for used tires, [the first waste diversion program directed to be wound up by the Minister under the WDTA](#), pending finalization of the Used Tires Regulation under the RRCEA by the Ministry of the Environment and Climate Change (MOECC).

The Authority is committed to engaging stakeholders in developing its operational policies and programs and is using a multi-pronged approach to its General Fee Setting Policy consultations. The consultations are guided by the principles¹ adopted by the Authority as show in Figure 1.

Principles for Consultation

- **Inclusiveness and Openness** – Engage broadly with stakeholders, provide clear information, and make the process accessible, comprehensible and responsive
- **Timeliness** – Engage stakeholders early before decisions are made and provide regular opportunities to engage
- **Accessible and Cost Effective** – Consider a variety of tools and methods to gather feedback that promote efficient and cost-effective consultations
- **Balance** - Provide opportunities for diverse perspectives and opinions to be heard and considered
- **Transparent** – Record feedback, report back summary to stakeholders and synthesize feedback into programs and policies as appropriate
- **Evaluation** – Demonstrate the impact of public consultations on program delivery and policy development

Figure 1: RPRRA Principles for Consultation

The Authority is currently conducting two rounds of Consultations to support the development of the General Fee Setting Policy.

¹ Adopted from OECD Best Practice Principles on Stakeholder Engagement in Regulatory Policy
[General Fee Setting Policy Consultation Report – Round 1](#) | Resource Productivity & Recovery Authority

Round 1 consultations were held October 4 and 5, 2017. Round 2 consultations, also via webinar, will take place in November/December 2017.

Following Round 2 consultations, the draft General Fee Setting Policy will be posted for comment. After the period for comments on the draft General Fee Setting Policy has closed, the feedback will be reviewed and the policy finalized and posted in early 2018.

Consultations on the proposed used tires fees are anticipated for early 2018.

Figure 2 outlines the consultations steps and timeline.

Consultation Steps and Timeline

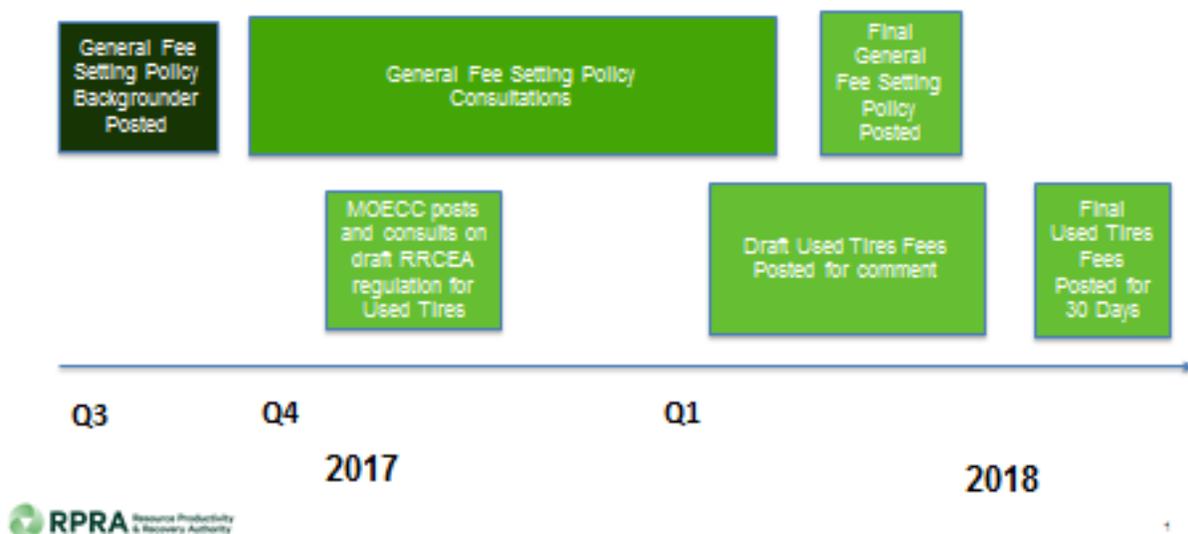


Figure 2: RPR Consultation Steps and Timeline

As other current waste diversion programs are directed to be wound up and as new materials are designated by the Minister, consultations will take place on related fees.

Fee Consultations – Round 1

RPRA launched the first round of consultations on its General Fee Setting Policy with the publication of the [General Fee Setting Policy Backgrounder](#) on the Authority's website in mid-August. The Backgrounder:

- provides an overview of the Authority's legislative framework and role, cost recovery models under RRCEA and WDTA and Authority 2017 operating costs;
- sets out best practices related to principles for fee setting;
- identifies areas where RPRA sought input on the policy development (i.e., fee categories and thresholds, fee payment timelines, fee review timelines, and fee policy review timelines); and
- informs readers on how to participate in the consultation process.

Written feedback was requested, but none was received.

Two webinars were subsequently scheduled for October 4 and 5, 2017 to further engage stakeholders in developing the general approach to structuring and setting RRCEA fees².

Over 90 people participated in the two webinars. Participants included individuals from the producer/steward community as well as municipalities, industry associations and service providers.

The webinar presentations included opening remarks (i.e., purpose, context and goals of the consultation) from Frank Denton, CEO. An overview of the Authority's mandate and its role was provided by Wilson Lee, Director of Communications & Stakeholder Relations. A discussion of the General Fee Setting Policy consultation was facilitated by Sandra Montague, Director of Finance & Administration. Geoff Rathbone, Director of Transition and Carmelina Macario, Program Lead, WEEE and Used Tires were both present during the webinars to respond to questions.

Written questions were taken from participants during the webinars, and presenters responded to questions and comments during the webinar.

A summary of what was heard during the initial round of consultations including written feedback received via email during the comment period following the webinars is found below in this report. The Authority will use the information to guide the next stage of fee policy development.

²Round 1 Fee Consultation was not about WDTA charges or specific fee categories, amounts or specific timelines.

The [slide presentation](#) and the recorded webinars were posted on the RPRA website immediately following the webinars. A survey seeking feedback on the webinars was sent to participants after each session. Results of the survey can be found in Appendix A.

Round 1 – What We Heard

During the webinars written questions and comments were solicited from participants at various points during the two sessions. In addition, key questions were posed by the presenters in areas where RPRA was seeking specific feedback. RPRA fee consultation topics included:

- Objectives and principles
- General fee categories
- Fee review process
 - Frequency of fee review
 - Frequency of General Fee Setting Policy review

For a complete list of the questions posed by RPRA see Appendix B. Participants were also encouraged to provide written responses or comments on the consultation topics to RPRA by October 18, 2017.

Feedback received was varied and included questions and comments about:

- How the fee policy is being developed including sources consulted to support development;
- The content of the fee policy including:
 - who will pay fees,
 - how will fees be structured;
 - how will the Authority's costs be allocated in the form of fees e.g. by material, by volume, etc.;
 - whether discounts apply for stewards in good standing;
 - whether fees should be commensurate with work required to manage the registrant;
 - whether fees will reflect geographical differences;
 - frequency of fee payment, fee review and policy review;
 - how is RPRA estimating the number of future obligated parties; and
 - who pays for activities associated with future work;
- RPRA's budget;
- Registry; and
- Fee consultation process and timelines.

The complete list of questions and comments and RPRA responses during the webinars along with a summary of the written feedback received by email can be found in Appendices C and D.

Comments received during the consultation will be taken into consideration as RPRA moves forward with its policy development.

Summary and Next Steps

RPRA will be using feedback from both the completed Round 1 and the upcoming Round 2 consultations to inform the development of its General Fee Setting Policy.

The General Fee Setting Policy will be used to develop specific fees for those obligated by regulation under the RRCEA.

Questions & Contact

Questions about this report or about future fee consultations can be directed to consultations@rpra.ca.

For all other inquiries please use the [contact information found here](#).

Appendix A – Webinar Evaluation Survey Results

RPRA sent an evaluation survey to all webinar participants following each session. RPRA had ~ a 10% response rate (n = 9), although some respondents did not complete the entire survey. Participants were asked the following questions:

- Did you read the Fee Backgrounder?
- Did you find the Fee Backgrounder document helpful?
- Did the presenters clearly outline and explain the issues?
- Did the consultation process provide a meaningful opportunity to engage with the Authority?
- Could the information have been presented in another manner?
- How could the consultation have been improved?
- On a scale of 1 to 5, with 1 being poor and 5 being excellent, how would you rate today's consultation?

Respondents who rated the presentation all rated it as very good to excellent.

Feedback indicated that the fee backgrounder was read and useful, the presenters clearly explained the issues, and the consultation was successful. One respondent commented that the open and transparent approach of the consultations was a clear departure from past practices and the approach adopted by the Authority would be conducive to establishing collaborative relationships with stakeholder communities.

All respondents indicated that the consultation provided an opportunity for meaningful engagement with RPRA. In addition, respondents indicated that the format and approach to present the information was appropriate for the subject.

A number of respondents suggested ways that the consultation could have been improved:

- One respondent suggested that a presentation on the 2018 Business Plan would have been helpful to understand the overall framework and impact of the upcoming changes to the steward community.
- Another respondent suggested greater clarity in outlining the goal of future fees and when they would be implemented would have been helpful.
- Another respondent suggested that, although issues were explained well, additional information on each of the consultation topics would have been useful in understanding the topics and for providing useful feedback.

Appendix B – Round 1 - Fee Consultation Topics & Questions

Objectives & Principles:

1. Are the proposed objectives and principles clear?
2. Do you support the proposed objectives and principles?
3. Should any of the proposed objectives or principles be set aside?
4. Are there additional objectives or principles that should be considered?

General Fee Categories:

1. Do the proposed fee categories reflect the types of fees RPRA should charge?
2. Are there other fee categories RPRA should consider?
3. Should any of the proposed fee categories be set aside?
4. Should RPRA consider variable fees (e.g. materials, company size, etc.)?
5. Should fees be payable in installments?

Fee Review Process

1. How often should fees be reviewed and set?
 - Annually?
 - Every 2 or 3 years?
2. How often should the General Fee Setting Policy be reviewed?
 - Every 2 or 3 years?
 - When new materials are designated?

Appendix C – Webinar Questions

Webinar Qs & As October 4 and 5, 2017	
Questions	Answers
Fee Policy Development	
Did you look at European waste authorities/Registries as well as DAAs in Ontario for policies?	<ul style="list-style-type: none"> • We've met with waste organizations in the UK, Ireland and Austria. • We did a scan of the DAA fee setting. • We have also incorporated the OECD's principles for user charging for government services.
Fee Policy	
Do companies need to register and pay fees on each and every program? Or do corporations have one fee for all their obligated products/packaging?	<ul style="list-style-type: none"> • We will take that option into consideration when developing the policy.
Retailers would not want to pay/handle admin of multiple fees. Fees can be modulated according to the size/cost of each program, but should be presented as a detailed invoice to avoid handling/processing multiple payments.	<ul style="list-style-type: none"> • We will take that into consideration when developing the policy.
Amortization timelines can be somewhat subjective and it could be inequitable to allocate them mostly to current stewards. How will the amortization period ensure these costs will be equitably shared?	<ul style="list-style-type: none"> • Our 2018 Business Plan outlines how we expect to amortize start-up costs. For example, costs associated with building the Registry are being amortized over 10 years to ensure that future registrants also contribute to these costs.

Webinar Qs & As October 4 and 5, 2017

Questions

Answers

<p>Are you considering capping the value of total fees in relation to the costs of programs covered by your mandate? There are best practices that can be followed to allow cost efficiencies.</p>	<ul style="list-style-type: none"> • Please provide examples of how capping is implemented in other jurisdictions or sectors.
<p>Will there be annual fee reporting to the RPRA by producers? Will there be annual fee reporting by municipalities?</p>	<ul style="list-style-type: none"> • The MOECC regulation will set reporting requirements. • A fee associated with reporting may be a disincentive to reporting compliance but each report results in transactional costs for the Authority.
<p>Has any thought been given to payment policy as it relates to the cash flow impact on Canadian business of changes to program fees or reporting timing?</p>	<ul style="list-style-type: none"> • One of the fee setting principles is equity among affected parties. • The MOECC regulation will set reporting timelines. • Consideration can be given to fee payment timelines.
<p>Will fees be focused on material type (i.e.: plastic, metal, etc.)?</p>	<ul style="list-style-type: none"> • We are looking for feedback on this issue.
<p>If variable fees are to be paid by stewards to be overseen by RPRA, the amount should not be linked to company size, but tied to volumes of materials managed through each stewardship program. Some companies market high volumes in certain obligated product classes, but extremely low volumes in other product classes.</p> <p>Low volume PPP stewards may not be required to pay material management fees if below certain volume thresholds or may be required to pay a small flat fee. Stewards want to be fully compliant, but considerations should be made to ensure that the</p>	<ul style="list-style-type: none"> • Consideration can be given to variable fees.

Webinar Qs & As October 4 and 5, 2017

Questions

Answers

<p>RPRA annual registration fee is not significantly greater than the amount a company is obligated to pay for material management.</p>	
<p>What about discount registration fees for stewards in good standing?</p>	<ul style="list-style-type: none"> • We will take that option into consideration when developing the policy.
<p>Review of fees should be annual or every two years (for budget planning); General Fee Setting Policy - annual review or biennial review.</p>	<ul style="list-style-type: none"> • Thank you for the feedback.
<p>Fees should be directly commensurate with the work, and only the necessary work, for managing that registrant. How that number is derived must be completely transparent to each steward.</p>	<ul style="list-style-type: none"> • Our objective is to structure fees to reflect the associated work as this reflects the fee setting principles. • Please share examples of how this is done elsewhere.
<p>Regarding fees, will RPRA be reporting direct fees (specific to programs) versus shared fees, and will the allocation methodology for shared fees and details of shared fees be made visible? Shared may be quite large with the Registry management, Board work, etc.</p>	<ul style="list-style-type: none"> • Our objective is a fee system that is simple and transparent.
<p>Will the Fee Policy reflect the differences in different geographical areas (i.e.: GTA needs versus rural northern Ontario needs)? For both producers in the GTA and rural areas; municipalities in the GTA and rural areas?</p>	<ul style="list-style-type: none"> • We will take that option into consideration when developing the policy. • We look to your feedback on this option.

Webinar Qs & As October 4 and 5, 2017

Questions

Answers

<p>How is RPRA estimating the number of future obligated parties when it is not yet totally clear on the scope of all future obligated material categories?</p>	<ul style="list-style-type: none"> • Our 2018 Business Plan makes a number of assumptions in an effort to manage this challenge. • If government decisions differ from our assumptions, we will adjust our forecast accordingly.
<p>Follow up to input to the budget; We believe/understand there are other RPRA activities such as responding to Minister directions and holding consultations on future work such as organics. Who will pay for those activities?</p>	<ul style="list-style-type: none"> • Fees collected from responsible parties (current and future) will fund the administration of RPRA.
<p>What will be the frequency of payments?</p>	<ul style="list-style-type: none"> • We are seeking your feedback on whether we should be charging on a monthly, quarterly or yearly basis.
<p>RPRA Budget</p>	
<p>Will the government be lending RPRA money to fund the start-up and amortization period?</p>	<ul style="list-style-type: none"> • No. • RPRA has obtained a line of credit from a third party institution.
<p>Fees are linked to the RPRA budget. Do stewards have input to the RPRA budget?</p>	<ul style="list-style-type: none"> • Our budget is set by the Authority Board of Directors in order to deliver our legislated mandate. • Our 2018 Business Plan is posted. Stakeholders are welcome to comment on it.
<p>Can RPRA consider how residual funds from the windup of IFOs can help fund the cost of development of the Registry?</p>	<ul style="list-style-type: none"> • RPRA must comply with the requirements of the WDTA and the WDTA does not allow for residual IFO wind up funds to be transferred to the Authority.

Webinar Qs & As October 4 and 5, 2017

Questions

Answers

<p>Has some thought been given to the revenue from admin penalties and how that may affect general fees?</p>	<ul style="list-style-type: none"> • RPRA does not assume administrative penalty revenue in our budget. • We will be consulting with stakeholders on administrative penalty policies once the Administrative Penalty regulations have been finalized by MOECC.
<p>Are there any efficiencies you can realize through the transfer of data from existing databases (instead of charging an initial fee)?</p>	<ul style="list-style-type: none"> • We will be transferring IFO data into the Registry. • The MOECC regulation will set reporting requirements.
<p>How will the initial RPRA costs be allocated among stewards of current programs (BB, MHSW, WEEE, UT etc.)?</p>	<ul style="list-style-type: none"> • The 2018 Business Plan describes the methodology to allocate costs to the RRCEA and to WDTA. • Allocation of costs to the existing IFOs is not part of this discussion. • Allocation of costs in the form of fees among the parties obligated under RRCEA regulations is the focus of this discussion.
<p>What is the current debt/line of credit that RPRA needs to recover? This should be transparently provided, including what portion of that debt is rightly addressed by general fees to stewards.</p>	<ul style="list-style-type: none"> • Please see our 2018 Business Plan for this information.
<h3>Registry</h3>	
<p>Will retailers have to report to the registry? Or would a future producer group report and register on our behalf, based on what we report to them?</p>	<ul style="list-style-type: none"> • The option to have a future producer responsibility organization report on behalf of producers will be considered, assuming that this is allowed by the MOECC regulation.

Webinar Qs & As October 4 and 5, 2017

Questions

Answers

Would RPRA consider buying a European turn-key solution rather than building from scratch? Ireland, Netherlands, etc., have built registries and charge €200 per steward, I estimate \$4,000 for each Steward in Ontario. Can't we be more efficient and reduce costs by leasing or adding onto existing systems?

- We hired a third party to assess our needs and the systems in use by other parties including those in Europe.
- We determined we needed a custom system built from off the shelf solutions.

Alongside the payment of fees, what sort of data would need to be submitted to RPRA?

- The MOECC regulation will set reporting requirements.

Consultation

There are a huge number of Ontario post-consumer waste consultations in October. How will you make sure consultations are accessible and enable stakeholders to participate given this volume?

It is not only consultation fatigue; it is how to make the consultations meaningful to stakeholders. It is one thing to show up for a webinar; it is another thing to do the follow-up needed to provide the thinking and input.

Will the consultation be recorded?

- This is our first round of consultations on this topic.
- We will release a recap of what we heard and we will return with another round of consultations as we develop the policy.
- The consultations are being recorded and will be posted on RPRA website immediately following the last webinar.

Miscellaneous

Are the targets set out in the MOECC's Strategy for a Waste-Free Ontario (on slide #7) brand new targets?

- Yes.

Appendix D – Written Feedback

Written feedback and comments were accepted by RPRA until October 18, 2017 on the General Fee Setting Policy.

The written submissions included questions and comments similar to those received during the webinars (i.e., related to fee policy development, fee policy, RPRA budget, the Registry and the consultation process). Highlights of the written submissions can be found in the table below.

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
Fee Policy Development		
Proposed objectives and principles	Fees collected by RPRA should cover the costs of administrating the business. In setting fees the Authority should ensure that all business costs are covered by the general fees and that the budget for the organization does not depend on the collection of administrative penalties.	
Timing of payments	Timing/frequency of payments may need to be dependent on the cost of the fee and the type of business (e.g., large vs. small). Fees can be assigned and invoiced on an annual basis and the Authority may wish to consider offering negotiated payment plans for those unable to pay full fees in a lump sum payment.	
Reporting by PROs	We would like the framework to allow future PROs to report on behalf of Stewards. This would likely streamline our reporting obligations and lessen the administrative burden to us. However, we would also like RPRA to consider that retailers such as ourselves	

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
	may develop their own program for certain product categories, and we ask that RPRA's fees not be prohibitively high so as to deter us from doing so.	
Fee predictability	We note that RPRA has highlighted predictability of fees as a key issue with regards to the fee timeline review, and we are supportive of RPRA taking an approach that ensures the highest amount of stability and predictability for stewards so that we do not incur unexpected costs or unmanageable fees.	
Fee Policy		
General fees include ongoing and start-up costs	It was not clear as to whether general fees will include only RPRA's ongoing costs or will they also cover start-up costs incurred by the Authority? To whom will those ongoing and start-up costs be allocated? We understand that fees under the general fee setting policy are not applicable to waste diversion programs under the WDTA. However, oversight costs of current diversion programs will be recovered from the current IFOs and ISOs. That would suggest that other RPRA costs would be recovered by fees under the RRCEA.	Fees are intended to cover operating costs, including amortized start-up costs.
	We request clarification whether General fees will cover only RPRA's ongoing costs, or also the start-up costs. It was stated that RPRA's start-up costs will be spread across parties' obligations under the <i>Waste Diversion Transition Act (WDTA)</i> and the <i>Resource Recovery and Circular Economy Act (RRCEA)</i> .	RPRA's annual costs are allocated to RRCEA and WDTA. Costs allocated to WDTA are recovered from industry funding organizations and industry stewardship organizations. Costs allocated to RRCEA will be recovered through fees paid by parties obligated under RRCEA regulations.

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
Who pays for fees when parties are not obligated	The Backgrounder states that registration fees collected under the RRCEA will be used to offset costs of administration, establishing and maintaining a registry, etc. Since regulations have not been passed under RRCEA, then general fees will apply to products yet to be designated and payable by future regulated parties. Who will be responsible for paying the costs in the interim? To whom will costs be charged when the parties are not yet obligated?	RPRA has arranged for a line of credit to cover costs allocated to RRCEA. This line of credit will be repaid over time with fees paid by parties obligated under RRCEA regulations.
Research of Future Programs	We understand that RPRA will of course follow the direction of the Minister to research and investigate potential programs and designated products for the future. While costs will be incurred, we note that those costs are for a program that is outside the mandate of current programs and are not the responsibility of currently obligated stewards. To whom will RPRA attribute those costs when obligated parties are not yet identified for products, which are not yet designated? We would respectfully recommend that such charges should be allocated only to the future stewards of the future program as it would be inequitable that fees be used to recoup such costs from current stewards.	RPRA cannot comment on the management of costs for research as no such requests have been received from the Minister.
Fees should be commensurate with work to manage registrant	We suggest that general fees be directly commensurate with only the necessary work by RPRA for managing the registrant. To this end, we would suggest activity-based costing, so that the derivation of fees is transparent. We suggest there could be a role for the Ontario Treasury Board Secretariat to provide oversight to achieve this. As well, the tools outlined in the federal Guide to Establishing the Level of a Cost-	

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
	Based User Fee or Regulatory Charge and the Guidelines on Costing may provide a helpful starting point. A principles-based approach such as this will also ensure that costs are equitably shared between stewards of various programs such as blue box, MHSW, tires, electronics and also stewards of future programs	
How will cost efficiencies be assured	Our members would like to understand how RPRA cost efficiencies will be assured. During the October 4-5 presentation, RPRA stated that all of its activities align with its mandate. However, we noted some activities appear to be discretionary. Those costs not directly in line with the mandate would not appropriately be covered by general fees.	
Achieving an equitable balance between current stewards and future stewards	In the interests of fairness, the costs for prospective programs should be borne solely by those stewards of such future programs. However, there is the question of who should pay for costs of prospective programs that do not come to fruition? If the research does not result in a program and products not being designated, who will pay for the accumulated research costs? It would be inequitable to broadly allocate them to current stewards of unrelated products.	RPRA cannot comment on the management of costs for research as no such requests have been received from the Minister.
	There will be many start-up costs including, but not limited to computers, programming, software, establishment of data bases, infrastructure and the like. Who then pays for these costs? The outcome of	RPRA has arranged for a line of credit to cover costs allocated to RRCEA. This line of credit will be repaid over time with fees paid by parties obligated under RRCEA

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
	start-up costs will be used to administer current programs as well as future designated products. While currently obligated stewards will help pay for those start-up costs, it seems only equitable that future stewards of upcoming programs should also help to shoulder the burden of start-up costs. After all, they will derive utility from what was established before they were a steward.	regulations. Registry costs are being amortized over 10 years.
	How RPRA will ensure equity for and amongst both current program stewards as well as future stewards. For example, costs for researching the organics and IC&I programs should be borne by future stewards and not by our members. How will this be achieved? Alternatively, how will RPRA fund work and research on products that may never become a part of a designated program, since there won't be any obligated steward? Allocating such costs to existing but unrelated stewards would be unfair? Also, how will future stewards share in the RPRA startup costs, given that much of the data accumulation, programming, computer and other hardware costs and consultants' costs, among others, will be used by future stewards who are not yet part of any program?	RPRA cannot comment on the management of costs for research as no such requests have been received from the Minister. RPRA has arranged for a line of credit to cover costs allocated to RRCEA. This line of credit will be repaid over time with fees paid by parties obligated under RRCEA regulations. Registry costs are being amortized over 10 years.
RPRA Budget		
Opportunity to provide Input on the Budget	We believe that the stewards who are paying for RRPA should have the opportunity to input to and comment on the RPRA budget. Stakeholders asked on October 4 whether stewards will have an opportunity to provide input to the budget. RPRA said that the	

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
	budget is posted, but there is no intention to do a consultation on it. We request that this decision be reconsidered in order to ensure transparency and to open the discussion on necessary efficiencies and budget oversight.	
	The October 4-5 presentation focussed on objectives, principles and background for fee setting but did not provide any cost information. We understand that RPRA began incurring costs in 2016. Our members would like to know what the 2016 costs were. We understand that the operating budget for 2017 is \$6.74 million. The draft operating budget for 2018 is \$8.56 million. The budget needs to be defensible to the steward community who are paying for it.	Please refer to RPRA's 2016 Annual Report which included audited financial statements setting out the 2016 costs.
Registry		
Use current IFO databases rather than build new system	During the October 4-5 presentation, stakeholders asked for an update on the development of the Registry system and the costs being incurred. As our members have already funded IT systems through the Industry Funding Organizations, can RPRA not start with the current IFO databases?	RPRA hired a third party to assess our needs and the systems in use by other parties including those used by the IFOs. We determined we needed a custom system built from off the shelf solutions.
Consultations		
Numerous consultations	Ontario is notably disproportionate in the demands being placed on industry. Our members and their trade associations already have nine consultations related solely to Ontario Blue Box and MHSW, in October alone. We understand that additional consultations on General Fees are planned for later in October. It is	

Summary of Written Feedback		
Category	Stakeholder Comments	RPRA Response to Questions Posed
	important to take the time to seriously consider the guidance and input provided by stewards.	
Miscellaneous		
	We expect that laws, regulations, and programs, as well as the organizations which support these waste frameworks should lead to true beneficial outcomes for the environment, and Ontarians, while also considering the financial health of the province and the businesses which operate within it.	