



# **2020 Registry Fees for Tires, Batteries, and Electrical and Electronic Equipment**

## **Consultation Report**

**September 29, 2020**

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## Introduction and context

From June 26 to August 10, 2020, the Authority consulted on its proposed 2020 Registry fees for tires, batteries and electrical and electronic equipment (EEE). These are fees that registrants pay to the Authority to cover the Authority's costs related to building and operating the Registry, and compliance and enforcement activities.

As part of the 2020 Registry fees consultation, the Authority also consulted on its General Fee Setting Policy and Methodology, which outlines the principles, rules, and method for setting Registry fees.

The Authority considered the feedback received during the consultation as it finalized the 2020 Registry fees and reviewed its General Fee Setting Policy and Methodology. The final fees were posted to the Authority's website on September 29, and stakeholders were notified the same day.

This report details the Authority's consultation process and the feedback received. Questions about this report can be emailed to [consultations@rpra.ca](mailto:consultations@rpra.ca).

### About the Authority

The Authority is the regulator created by the Ontario government to enforce the requirements of the *Resource Recovery and Circular Economy Act, 2016* (RRCEA) and the *Waste Diversion Transition Act, 2016* (WDTA). The RRCEA establishes a new resource management regime where producers are individually responsible and accountable for their products and packaging, recovering resources and reducing waste. The WDTA allows for the continuation of waste diversion programs and sets out provisions to wind up those programs as directed by the Minister of the Environment, Conservation and Parks.

The Authority does not receive any government funding. The WDTA and RRCEA allow the Authority to set and collect fees to recover its costs from regulated parties. The Authority's revenues come from two sources:

- **WDTA:** Charges to industry funding organizations and industry stewardship organizations for the Authority's oversight of current waste diversion programs.
- **RRCEA:** Charges to parties required to register or report to the Authority to cover the development and operation of the Registry and compliance and enforcement activities.

### About the 2020 Registry Fees

2020 is the first year that Registry fees include multiple material groups. Tires was the only group required to pay Registry fees to the Authority in 2018 and 2019, as it was the sole material designated under the RRCEA. Batteries is the second material designated under the RRCEA and transitioned to the new regulatory framework on July 1, 2020. Waste EEE is scheduled to transition to the new framework on January 1, 2021. The regulation designating EEE under the RRCEA was published on September 21, 2020. Registrants obligated under the Tires Regulation, the Batteries Regulation and the EEE Regulation will all be required to pay Registry fees to the Authority in 2020.

The initial proposed fees for EEE assumed that the EEE Regulation will cover the same range of materials currently accepted as part of the Waste Electrical and Electronic Equipment Program operated by Ontario Electronic Stewardship. The final 2020 Registry fees were revised based on stakeholder feedback received through this consultation and the final EEE Regulation.

The proposed 2020 fees considered the Authority's General Fee Setting Policy and Methodology, which were consulted on and issued in early 2018. The Authority also sought feedback on its General Fee Setting Policy and Fee Setting Methodology during this consultation process.

## Principles for public consultation

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

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

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

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

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

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

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

## Consultation process

Consultation on the 2020 Registry fees and the Authority's General Fee Setting Policy and Methodology, began on June 26, 2020. A [dedicated web page](#) was created on the Authority's website with background information on the consultation, registration links for the consultation webinars and presentation materials.

Stakeholders were invited to submit feedback via one of two webinars or via email. The Authority conducted its consultations online only due to COVID-19. The Authority emailed its general mailing list (approximately 1400 subscribers) on June 29 and reminders were included in the Authority's July and August newsletters. Current and potential registrants who will be required to pay fees in 2020 were also invited to participate via email, including tire producers, potential battery producers and potential EEE producers.

The Authority accepted stakeholder feedback until August 10, 2020, concluding the 45-day consultation period.

## What we heard

The Authority received extensive feedback during its webinars and separately received nine written submissions via email. There were 123 participants in the July 9 webinar and 59 participants in the July 10 webinar. The webinar presentation and recordings can be found [here](#).

The feedback is summarized below and categorized by the following themes:

- General fee related
- Proposed fees for batteries
- Proposed fees for electrical and electronic equipment
- Fee consolidation
- The role of PROs
- Duplication of services

Feedback that was not relevant to this consultation has been excluded from the summary. For example, some feedback related to government decisions on the content of regulations, which is outside the scope of this consultation.

For a list of stakeholders that submitted written feedback, see [Appendix A](#).

For a list of questions received and answers provided, see [Appendix B](#).

### General fee related

Some stakeholders stated that producer fees should be fixed, not variable. There was some support to introduce variable fees for PROs to reduce the cost for small PROs and ensure they can compete in the marketplace with the larger PROs.

Some comments noted that, since Registry fees may lower over time as more producers register, the Authority should defer, or reduce, expenses until all materials are transitioned/Registry builds are fully implemented.

### Proposed fees for batteries

Some stakeholders were concerned that the budget allocation and proposed fees for batteries were too high and assumptions were flawed. In particular, some said the proposed fees were disproportionately high based on the lower selling price of batteries, when compared to larger margins for electronics and tires, or that the number of estimated battery producers, which the proposed fees were based on, was inaccurate. Many were looking for a further breakdown of the fees and more information on the methodology behind the fee calculations. They called on the Authority to find efficiencies and ways to reduce the fees for battery producers.

### Proposed fees for electrical and electronic equipment

Some stakeholders were concerned that the budget allocation and proposed fees for electronics were too high and assumptions were flawed. Some also believed that fees for electronics should be unit-based, not weight-based. They called on the Authority to find efficiencies and ways to reduce the fees for electronics producers.

### Fee consolidation

Stakeholders expressed that producers in multiple material categories should pay a single fee (i.e., consolidated invoice), not multiple fees, to help reduce the burden on producers by simplifying the reporting process. There were some comments suggesting a discount for producers in multiple material categories to avoid paying for Registry services more than once.

**The role of PROs**

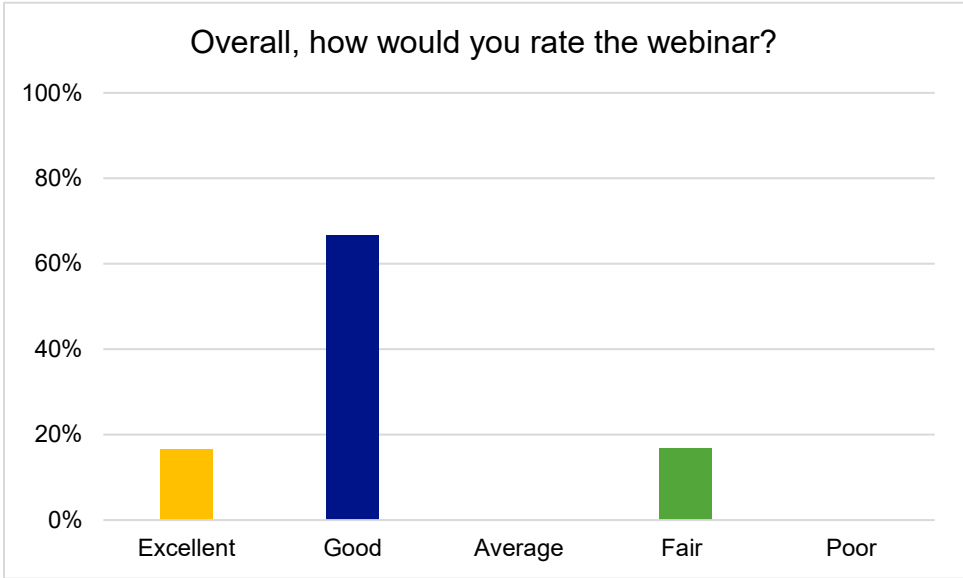
Stakeholders commented that PROs should be allowed to pay fees and submit supply data to RPRA on behalf of their producer clients to streamline the process and increase efficiency. Some believed that only PROs should be required to register with the Authority and be charged fees.

**Duplication of services**

There was concern among stakeholders that there will be duplication between, on the one hand, the Authority’s data collection and the function of the Registry itself and, on the other hand, PROs and/or industry associations and their data collection/management systems. There were recommendations that RPRA should work with PROs to leverage existing systems or tools and not rebuild them in order to find efficiencies and reduce costs.

## Consultation evaluation

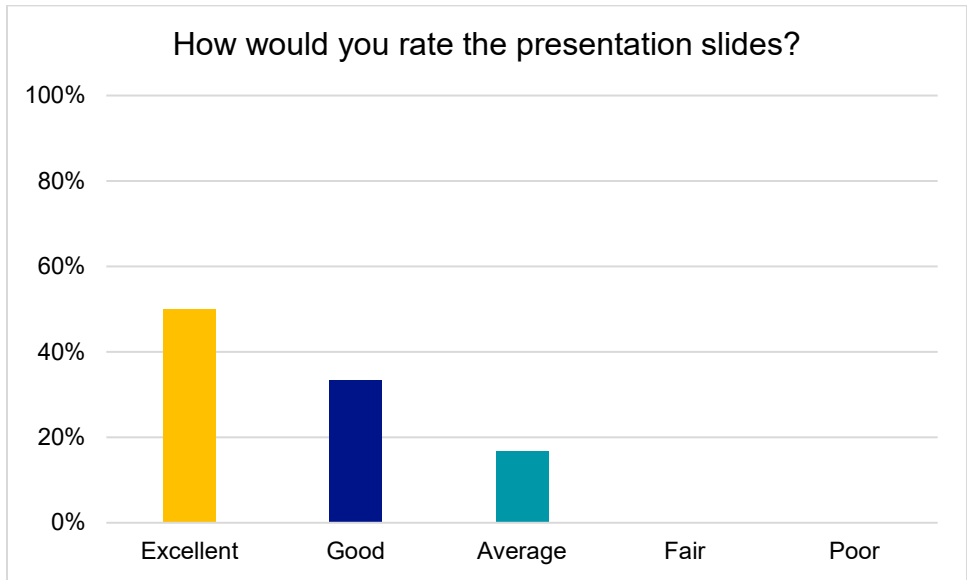
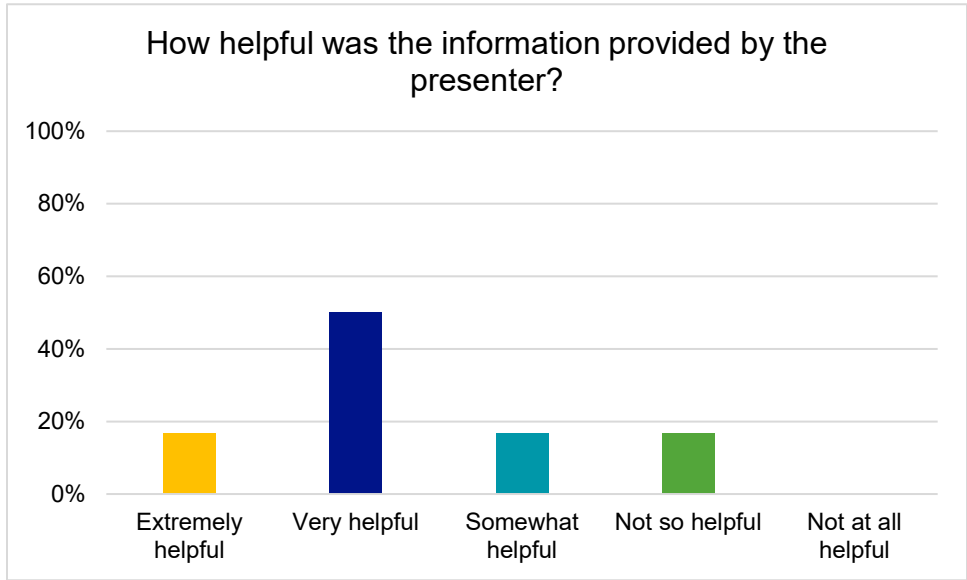
To help the Authority improve future consultations and communications, participants were invited to complete a short feedback survey following each of the consultation webinars. The following charts show how participants rated the consultation process.

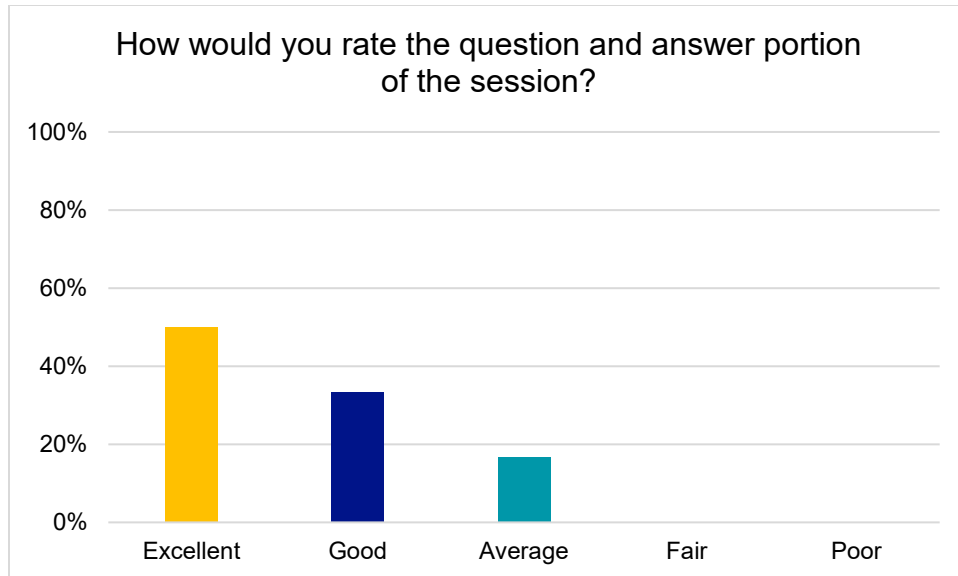


Comments on the overall satisfaction of the webinar included:

- “History and government requirements have been explained at every webinar and I feel this is not necessary any longer.”

- “Presenter was good. Not excellent simply because I am a consumer and the presentation was informative, but not anything I require.”





Comments on the question and answer portion of the webinar included:

- “Both (presenters) Pat and Geoff know their material well, very helpful.”

General comments on how the Authority can improve future consultation webinars:

- “Overall, an excellent session, no significant improvements to suggest.”
- “Keep doing the same.”

## Conclusion

The Authority considered all stakeholder feedback as it finalized the 2020 Registry fees. The final fees have been modified based on the feedback received during the consultation process, as well as the final EEE Regulation, from the initial [2020 Registry Fee Proposal](#) posted on June 26, 2020, then updated on July 9, 2020.

The General Fee Setting Policy and Methodology will be reviewed to reflect the structure of the final 2020 Registry fees.

The four primary amendments to the initial 2020 Registry fees are listed below, as well as the Authority’s rationale for the modification.

### **Amendment 1: Lower number of assumed EEE and battery producers**

#### **The Authority’s Rationale**

Stakeholder feedback indicated that the number of expected registrants, for both EEE and batteries, is less than the estimates provided in the initial fee proposal. Taking this feedback into consideration, the Authority reduced the forecast number of EEE and battery producers as seen in the final fees. The Authority also reduced the forecast kg supplied of EEE because of stakeholder concerns that the number in the proposal was too high. The decision to make this



amendment was further supported as the new numbers align more closely with the final EEE Regulation.

### **Amendment 2: Eliminate PRO fees**

#### **The Authority's Rationale**

The proposed \$7500 PRO fee was considered a barrier to market entry by small potential PROs. To address this concern, the Authority considered a tiered fee mechanism for PROs, but decided on eliminating the PRO fee altogether to ensure a level playing field and competitive marketplace for larger and smaller PROs and eliminate complexity in the methodology. This amendment recognizes that producers indirectly pay their PROs' Registry fees as these are passed on by PROs.

### **Amendment 3: Merge EEE and battery fees into single fee**

#### **The Authority's Rationale**

There were concerns from the battery sector that its' relatively small scale of kg supplied into the market, when compared to EEE kg supplied into the market, created an extraordinarily high battery fee on a per kg basis.

The Authority decided to merge the two material groups to help reduce the high battery fee. A merged fee also recognizes the significant interaction between EEE and battery producers due to batteries embedded in electronic products. The change simplifies the registration/reporting process and reduces administrative burden for producers in both groups. There are many producers with both EEE and battery registration requirements who will now pay a single blended fee instead of two separate fees.

### **Amendment 4: Eliminate flat fee for small EEE and batteries producers**

#### **The Authority's Rationale**

The final EEE regulation was posted on September 21, 2020 following the conclusion of the fee consultation period. The fee proposal was amended to align with the exemption threshold for producer registration, reporting and management requirements in the EEE regulation. Based on feedback from stakeholders, it was also determined that very few battery producers would qualify for the flat fee.

## **Appendix A: Stakeholders that submitted written feedback**

The nine written submissions were received from the following stakeholders:

- Canadian Battery Association
- Costco Wholesale Canada Ltd.
- Electronics Product Stewardship Canada
- Global Automakers of Canada
- GS Battery - Canada
- Johnson Controls International
- National Electrical Manufacturers Association
- Retail Council of Canada
- Total Battery Group of Companies

## Appendix B: Questions and answers

Below are the questions and comments received during the webinars and via email, and the Authority's responses. Questions not relevant to this consultation have been excluded. Some questions were edited for length and clarity.

### Received via webinar

Question	Response
Can you clarify the difference between direct, foundational, and common costs?	<p>Direct costs are related to one material portal (e.g. tires), such as Registry portal amortization and interest.</p> <p>Foundational expenses are related to general Registry platform components that are not specific to any one material, such as system security and log in functions.</p> <p>Shared costs are related to administrative, support and operational compliance functions that are common to all material groups.</p>
<p>Can you apprise us of the logic why registration should require a variable fee? Reporting and verification should be the same whether the manufacturer is large or small.</p> <p>Electronics is not tires. There are many large and medium manufacturers. There are very few small tire manufacturers.</p>	<p>We initially looked at a flat fee across all sizes of producers. However, to account for the varying levels of administration and support required, difficulty of audit verifications, etc. between large and small producers, we introduced variable fees.</p> <p>There is a large number of small tire producers registered with the Authority. Approximately 400 of the 450 producers registered with us are considered to be small producers and account for 15-20% of the tires supplied. Only 20 account for 70-80% of the tires supplied and are considered large producers, and 20-30 are considered medium producers. We are seeing a similar breakdown with battery producers and expect the same pattern with electronics.</p>
What is a fixed fee producer?	A fixed fee producer is a producer that will pay a one-time flat fee for 2020 based on a below/above cut off point. Tire producers that supply 0-999 tires will have to pay a \$75 fixed fee.
How was the 133 million now 90 million kg (of electronics) determined? What weight-to-unit conversion was used?	This estimate is based on an average of the last three years of OES collection data x 70% recovery rate outlined in the Draft Electronics Regulation plus 10% additional recovery.

	<p>When the consultation period began in late June, a version of the 2020 Registry Fees Proposal was posted on the RPRA website for the purpose of consultation. Within this earlier revision, it was estimated 133,000,000 kg could be supplied by electronics producers, but as the Authority noted during the webinar consultation sessions the estimate has since been updated based on new information and initial stakeholder feedback.</p> <p>RPRA will know the actual weight supplied by electronics producers once producers register and report their market supply in November 2020, and based on that weight there may be a need for a true up in 2021 Registry fees, if the reported weight turns out to be materially higher or lower than 90,000,000 kg.</p>
<p>If a battery producer produces less than 80,000 kg they were not required to register, however in the earlier slides, the variable charge starts at 1000 kg. Are small battery producers (less than 80,000 kg) expected to pay a fee but not report?</p>	<p>The Batteries Regulation determines producer exemptions (i.e. a producer may be exempt from registering and/or reporting requirements), which is based on the producer's management requirement and the number of full-time employees the producer has. Batteries producers are exempt from registration if their management requirement for a performance period is not more than one and one-quarter tonnes with respect to rechargeable batteries, or not more than two and one-half tonnes with respect to primary batteries, and the producer has the equivalent of fewer than five full-time employees. See the Batteries regulation for additional detail.</p> <p>Producers that are required to register with the Authority must pay Registry fees. The cut-off that we have indicated in the presentation (e.g. less than 1000 kg supplied) is separate from the exemptions outlined in the regulation. For example, if a producer supplies less than 1000 kg and is required to register with the Authority, as per the Batteries Regulation, that producer must pay the \$75 flat Registry fee.</p>
<p>Will the fees on rechargeable batteries due on Nov 30, 2020 be retroactive back to all of the 2018 sales data?</p>	<p>Registry fees are intended to cover the cost of operating the Registry in the year they are collected; they are not retroactive.</p> <p>Supply data is reported by producers every year and is used to calculate a producer's performance requirements and the Authority's Registry fees. In 2020, rechargeable battery producers must submit the weight of rechargeable batteries supplied in 2018 as part of the registration process ending on November 30. This will be the basis of the producer's performance requirements and Registry fees.</p>

<p>What happens if the number of producers is half of what is projected? What happens if the number of producers is 2x what is projected?</p>	<p>One of the five rules that guides the Authority's fee setting methodology is "No in-year adjustments - any adjustment required will be reflected in the calculation of fees for the next calendar year." As we will not know the actual number of producers until the registration process is complete, we would make an adjustment, if necessary, in the next calendar year.</p>
<p>Stakeholder is concerned that the proposed Registry fees are higher than anticipated and would put Ontario out of line with other provinces.</p>	<p>Thank you for your comment. The Authority's fees are based on Ontario's regulations, and regulatory frameworks vary across Canada making it difficult to compare.</p> <p>The fees that occur in other jurisdictions may not be divided or collected the same way as the Authority's. Regulators in different provinces may approach fees differently depending on the regulatory regime they operate in. In Ontario, we are operating under the producer responsibility regime where there is one regulator (i.e. the Authority) to ensure compliance with individual producer obligations.</p> <p>There are also not any true comparators in Canada or other jurisdictions because there is a wide range of ways that regulatory bodies are funded (e.g. some are funded by taxpayers). In Ontario, we are recovering the costs from parties that are regulated to cover both the capital cost of building the Registry and cost to carry out compliance and enforcement activities.</p>
<p>Have you benchmarked your fee methodology and levels against similar Registries in other jurisdictions?</p>	<p>It is difficult to compare fees and fee methodologies as regulatory frameworks vary across jurisdictions. The fees that occur in other jurisdictions may not be divided or collected the same way as the Authority's. Regulators in different provinces may approach fees differently depending on the regulatory regime they operate in. In Ontario, we are operating under the producer responsibility regime where there is one regulator to ensure compliance with individual producer obligations.</p> <p>There are also not any true comparators in Canada or other jurisdictions because there is a wide range of ways that regulatory bodies are funded (e.g. some are funded by taxpayers). In Ontario, we are recovering the costs from parties that are regulated to cover both the capital cost of building the Registry and cost to carry out compliance and enforcement activities.</p>
<p>Would there be a fee for those years that there are no goods sold in Ontario?</p>	<p>Supply data is reported by producers every year and a rolling average of that data is used to calculate performance requirements and the Authority's Registry fees (e.g. rolling average of three years of supply data for tire producers). This</p>

	<p>rolling average approach is intended to even out the market as it recognizes that producers' sales will vary year-to-year.</p> <p>The Authority also recognizes that there may be unprecedented sales years (e.g. much lower sales due to COVID) and will take it into account when assessing a producer's ability to meet their performance requirements.</p>
Do the projected producers include rechargeable battery producers?	Yes, they include both single-use and rechargeable battery producers.
The weight for electronics does not include packaging, correct?	Correct, the weight of electronics packaging is excluded in the draft Electronics Regulation.
What about charging PROs only? Was that considered? Then PROs would pass those costs to producers, but different PROs may compete to find a different way to do so.	. As the Authority's fees are based on the data that producers submit, the final step of the supply reporting process is for producers to pay their Registry fees.
Did you consider having only PROs register?	The Authority does not decide who is required to register. Each regulation (e.g. tires, batteries) created by the Ministry of the Environment, Conservation and Parks outlines the obligated parties and their requirements, including registration and reporting with the Authority.
Could a RPRA policy be put in place to allow for PROs to remit fees on behalf of regulated individual producers?	As the Authority's fees are based on the data that producers submit, the final step of the supply reporting process is for producers to pay their Registry fees.
Could you please explain what a PRO is again?	A producer responsibility organization, or PRO, is a business established to contract with producers to provide collection, management and administrative services to help producers meet their regulatory obligations under the regulations. PROs operate in a competitive market and producers can choose the PRO (or PROs) they want to work with.
Have you considered having some sort of variable fee setting mechanism for PROs? The current fixed cost system yields a higher registration cost-per-unit for small PROs, which could be argued is an economic impediment for new PROs servicing the small & mid-sized producers.	Thanks for your question and comment. We will consider all feedback as we finalize the 2020 fees.
Does RPRA operate as 'revenue neutral' or for profit?	RPRA operates on a cost-recovery basis only. As an administrative authority of the Government of Ontario, the Authority does not receive any government funding and funds its operations through fees charged to regulated parties on a cost-recovery basis. Registry fees cover the Authority's costs to develop and operate the Registry and carry out compliance and enforcement activities.

	The Authority has an operating reserve that cannot exceed 50% of its operating budget, as outlined in the legislation.
Do car batteries fall into the same category as "single use"?	The Batteries Regulation applies to batteries that weigh 5 kg or less, so car batteries would not be included. You can read more on our Batteries webpage here: <a href="https://rpra.ca/programs/batteries/">https://rpra.ca/programs/batteries/</a> .
Will there be a transition period for producers after the regulation comes into effect, during which producers can understand the scope of their obligation under the regulation and comply accordingly? How long will this transition period be for?	<p>We will take a similar compliance approach with batteries and electronics as we did with tires, where the first year was considered to be a transition year. Our focus during that first year was to support all registrants, help them understand the new regulation and their new requirements, and ensure they are in compliance. We understand that people need the opportunity to adapt to the new framework.</p> <p>The ministry built this concept into the Batteries Regulation – every producer shall make best efforts to meet their management requirements during the first performance periods, as calculated in the regulation. ‘Best efforts’ is a requirement to do everything that is reasonable in order to comply with the requirements. This same concept has been built into the draft Electronics Regulation.</p>
If a producer's product is not covered under the OES covered electronics, then do they still have to comply with the WEEE program after its transition?	The final Electronics Regulation, currently being drafted by the Ministry of the Environment, Conservation and Parks, will determine what products are obligated under the new framework.
Are covered products, specific to electronics, limited to those sold to consumers or are business-to-business and government transactions eligible too?	The draft Electronics Regulation applies to products that are supplied into the Ontario market regardless of who the consumer is (e.g. individual consumers, businesses, etc.). The same applies in the Tires Regulation and Batteries Regulation.

**Received via email**

Question or comment	Response
Is it fair to assume that Registry fees payable to RPRA by brand owners will continue to be their liability on material supplied to us, while we remain responsible for PRO fees recoverable from customers?	Registry fees, along with all of the cost associated with managing products when they have reached end of life, are the responsibility of producers. These costs, along with all the other costs associated with the manufacturing and delivery of products to consumers, will factor into the price of those products.
Under the OES program, distributors were allowed to take responsibility for the electronics as long as there was an agreement between the producer (or manufacturer) and distributor. Will this still apply under the new program?	Under the new program, producers are individually responsible for their products and always remain responsible for the management of those products.
Under the OES program there was a cost per unit, why has Ontario moved to kg? The rest of the provinces under the EPRA will have the same	Under the regulations, producers are required to report the number of kilograms of product they supply to Ontario consumers. This data is used to establish the performance requirement, also in

<p>reporting in per unit except for Ontario. This creates more duplication and work for producers.</p>	<p>kilograms, to be met by producers. The Authority uses the same data for fee-setting purposes.</p>
<p>For many producers there are many SKUs for all the different products. If the reporting is switched to kg, would the producer need to weigh each SKU item or is there a guide (showing weights to be used for various items) that will be given so it can be applied for the different items?</p>	<p>Producers have the option of reporting the actual weight of the products they supply, or using the calculated weight based on weight conversion factors published by the Authority. Conversion factors exist for <a href="#">tires</a> and have been developed for <a href="#">batteries</a> and <a href="#">electronics</a> in consultation with stakeholders.</p>
<p>During the recent RPRA Fee methodology webinar and in the backup material, two numbers were given for the Put On Market (POM) weights for obligated electronics. One figure was 113,000 T POM, then 90,000T POM, and if you work backwards from the OES 48,000T recovered at a 62% recovery rate, then that works out to 77,000T POM (estimated). Can you provide the methodology you used for the POM weight for electronics?</p>	<p>Slide 13 of the <a href="#">consultation presentation slides</a> describes the methodology as follows:</p> <p><i>This estimate is based on an average of the last three years of OES collection data x 70% recovery rate outlined in the Draft Electronics Regulation plus 10% additional recovery. This proposal has been updated to reflect the new basis for the estimate, which was presented at our consultation webinars on July 9 and 10.</i></p> <p>When the consultation period began in late June, a version of the 2020 Registry Fees Proposal was posted on the RPRA website for the purpose of consultation. Within this earlier revision, it was estimated 133,000,000 kg could be supplied by EEE producers, but as the Authority noted during the webinar consultation sessions the estimate has since been updated based on new information and initial stakeholder feedback.</p> <p>RPRA will know the actual weight supplied by EEE producers once producers register and report their market supply in November 2020, and based on that weight there may be a need for a true up in 2021 Registry fees, if the reported weight turns out to be materially higher or lower than 90,000,000 kg.</p>
<p>Can you provide the detail behind the calculations used to arrive at each of the material types share of the RRCEA fees? I am most interested in understanding how you arrived at \$930K (\$0.14/kg) for batteries but would also be interested in seeing the detail behind tires and electronics as well.</p> <p>We are concerned about how high the battery fee is, and I do not feel as though I have enough information to confidently provide feedback to RPRA until I understand the detail behind the calculation.</p>	<p>The fee calculation methodology for all material categories are based on a consistent set of fee setting Policies, Rules and Methodologies described in the consultation deck. The methodology relies on an estimate or forecast of the number of Producers that will register in 2020 (for Batteries the estimate is 330) and the estimated Kg supplied estimated to be 7 million kg/yr). The consultation process sought stakeholder feedback on these two critical assumptions.</p>
<p>I just wanted to note that there should be no fees on SLA lead acid batteries under 5 KGs as these batteries are already fully recycled by the battery</p>	<p>Thank you for your feedback. The Registry fee Is not influenced by the cost to recycle or value of the material in the marketplace. The Registry fee assigned to each material represents a</p>



<p>industry for years as they represent a profit source since smelts will pay .30 cents/lb for them.</p>	<p>reasonable share of the overall cost of developing and operating the Registry and compliance program and RPRA shared expenses.</p>
<p>Will producers of one category of batteries above the 1,000 kg threshold (paying the variable RPRA fee) also have to pay the RPRA flat \$75 fee if they are below the threshold in the other category? Or is the fee determined by total supply to the market regardless of category?</p>	<p>No, if the producer is above the threshold in any subcategory of battery supply, they will pay only the variable rates on total Kgs registered.</p>
<p>Will Producers still have to pay the registry fees for electronics and for batteries if they register with a stewardship organization?</p>	<p>Yes, producers must register with RPRA and pay fees even if they are working with a stewardship organization (i.e. a PRO).</p>