

The Authority is consulting on its proposed 2021 Registry fees for Blue Box materials and Hazardous and Special Products (HSP). These are fees that registrants pay to the Authority annually to cover the Authority's costs related to building and operating the Registry, and compliance and enforcement activities.

Below are the questions received during the consultation webinars and the Authority's responses. Questions have been organized by the topics below, and questions not relevant to this consultation have been excluded. Some questions were edited for length and clarity, and similar questions were grouped together. For the Authority's updated responses in setting the final fees, see the [Consultation Report](#) published on August 24, 2021.

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General fee related

Question	Response
Have you considered only asking producers who are not participating in a stewardship program run by a PRO to pay a registration fee directly to RPRA?	All producers obligated under the Blue Box or HSP regulations are required to register, report and pay their Registry fee to RPRA, whether or not they were obligated as stewards under the existing legacy waste diversion programs (Blue Box Program or the Municipal Hazardous or Special Waste Program), and whether or not they have contracted with a PRO to provide services under the new regulations.
Producers (e.g., paint) are trying to calculate their weight supplied. When will the conversion factors be available in order to calculate the weight supplied?	RPRA will provide the weight conversion factors to producers of HSP ahead of the registration/initial reporting deadline. For more information on how to determine supply data, review our Registry Procedure – Verification and Audit .
If RPRA is providing services related to service providers, has it been considered to	The decision to make producers pay fees and cover Authority costs was made to reflect the fact that the <i>Resource Recovery and Circular Economy Act, 2016</i> (RRCEA) is based on a producer responsibility framework. Although producers

<p>have them register and pay for those services provided by RPRA as you outlined?</p>	<p>may hire PROs or service providers to help meet their obligations, the responsibility for performance under this framework remains with the producer. The Authority believes that making producers responsible for the costs of administering the programs aligns with this framework. Not requiring fees for service providers also supports competitive markets for resource recovery services by reducing barriers to entry, benefitting producers who need such services in order to comply. Restricting the number of fee-paying registrants to only producers also provide efficiencies to RPRA operations, which creates overall savings to the budget when compared to charging service providers as well as producers.</p>
<p>What does the fee cover? Can we get a breakdown of what it covers apart from the administrative costs of RPRA?</p>	<p>RPRA's Registry fees cover the costs related to compliance and enforcement and other activities required to administer the regulations under the RRCEA and building and operating the Registry.</p> <p>The costs are further broken down into direct costs and common, or shared, costs. Direct costs are allocated to each program and include the cost and interest of building the program-specific Registry portal, as well as foundational expenses that are related to general Registry platform components and not specific to any one program, such as system security and log in functions. Shared costs are related to the compliance, administrative, communications, support and other functions that are common to all material groups.</p>
<p>Are the Registry fees paid annually?</p>	<p>Yes, our current approach is for obligated parties to report and pay their Registry fee to RPRA annually, which covers the annual cost of administering the regulations. The current approach also involves consulting on and setting our Registry fees annually. We are setting 2021 Registry fees for Blue Box and HSP now due to the timing of the release of the final regulations, which were published in June. We intend to consult on and set 2022 Registry fees later this year.</p>
<p>Can the producer/brand owner pass on RPRA's Registry fee to consumers (i.e., as a separate line item at the Point of Sale)?</p>	<p>It is up to the producer whether they choose to charge a separate fee (e.g., environmental fee, eco-fee, etc.) to consumers at the point of sale. These fees may be applied at the discretion of businesses to cover their costs related to recycling their products. RPRA does not mandate businesses to charge environmental fees, nor do we set the amount of the fee to be charged. The regulations under the RRCEA also do not require the use of these fees. If a producer chooses to charge a separate fee related to resource recovery, specific</p>

	rules under the Tires and HSP regulations will apply. See the RPRA website for more information.
Are there any deductions made for producers that participate in all/multiple programs?	There are no fee deductions for producers that participate in multiple programs. Our current rules for fee setting outline that fees apply to each program (note: batteries and electronics are considered one program for the purposes of 2021 fee setting).

RPRA's role

Question	Response
<p>When a producer has a PRO acting on their behalf who is responsible for oversight, and the producer already pays the PRO an administrative fee that covers all the program expenses, what added value does RPRA bring in oversight or additional effort?</p> <p>Currently, I report Blue Box data to CSSA (Canadian Stewardship Services Alliance). How is this different from reporting/paying fees to RPRA? Do I have to report and pay fees to both CSSA and RPRA?</p>	<p>RPRA is the regulator established by the Government of Ontario to enforce the requirements of the new regulatory framework under the RRCEA. RPRA is not responsible for providing recycling services or arranging for the collection or recycling of end-of-life products or materials in Ontario. Under the new framework, producers are responsible for establishing collection and management systems to meet their requirements under the regulation. Most producers will work with PROs (or producer responsibility organizations) who will establish these systems on their behalf. Producers are free to make their own commercial arrangements with PROs and other service providers.</p> <p>CSSA provides services to Stewardship Ontario, which is the industry funding organization that operates the current Blue Box Program on behalf of industry stewards under the Blue Box Program Plan and <i>Waste Diversion Transition Act, 2016</i> (WDTA).</p> <p>RPRA's Registry fees do not go towards establishing or implementing collection and management systems. RPRA's Registry fees cover the costs related to building and operating the Registry, which includes publicly reporting on performance, and compliance and enforcement activities required to administer the regulation under the RRCEA. Producers are obligated under the law to register, report and pay Registry fees to RPRA.</p> <p>During the Blue Box Program transition (ending December 31, 2025), stewards will still be obligated and have to meet their requirements (e.g., reporting to Stewardship Ontario) under the Blue Box Program Plan and the WDTA. At the</p>

	<p>same time, producers will be required to meet their obligations under the new Blue Box Regulation under the RRCEA, which includes registering, reporting and paying their Registry fee to RPRA.</p>
<p>Can you further explain how compliance and enforcement functions will work? What is the function of the inspectors?</p>	<p>Our Compliance Team has the powers of a provincial regulator: inspections and audits, investigations, compliance orders, administrative penalty orders and prosecution. The primary function of the Compliance Team is to ensure that producers and other obligated entities comply with their obligations under the RRCEA and WDTA and associated regulations. Our approach to compliance begins with communications, or Communicating for Compliance (C4C), where we use communication tools to proactively support registrants in understanding and complying with the new regulations.</p>
<p>There may be some businesses obligated to register but may not register on time. Is it RPRA's responsibility to enforce compliance?</p> <p>Are there fines set for free riders?</p>	<p>Yes, RPRA is responsible for ensuring obligated parties meet their requirements under the regulation, which includes registering and reporting with RPRA. Our approach to compliance begins with communications, for example, communicating directly with obligated parties and informing them of their requirements and when they must complete their requirements.</p> <p>Bringing free riders – companies that meet a definition (e.g., producer, hauler) in the regulation but have not registered or reported to RPRA – into compliance is a key focus of RPRA's compliance program. RPRA's Compliance and Registry Team has had a number of successes identifying both large and small free riders, bringing them into compliance and requiring them to pay fees owed. RPRA continues to devote resources to identifying and responding to high-priority free rider cases in 2021.</p>

Registry, registration and reporting requirements

Question	Response
<p>Why doesn't RPRA use Excel Spreadsheets for manual operations? It has worked well for years, and PROs will still have that info if RPRA needs to continue over the year or in years to come, but the only difference is having to pay the Registry fee.</p>	<p>RPRA is obligated under the RRCEA to establish, maintain and operate an electronic public Registry. Spreadsheets do not provide the security and functionality required to operationalize the requirements outlined in RRCEA regulations in an efficient and secure way, including fee payment and assessing performance and compliance. Spreadsheets would inevitably have to be integrated into a data management system to support the compliance function</p>

<p>What will the Registry deliver that the current PROs now, and in future, will not be able to?</p>	<p>and meet the statutory mandate to operate an electronic public Registry on behalf of the people of Ontario.</p> <p>RPRA's Registry fee covers more than just the cost to build and operate the Registry. Our Registry fees also cover the compliance and enforcement activities required to administer the regulations under the RRCEA, and all of the support functions related to those activities. In addition to compliance and enforcement activities, we are required to publicly report on performance data that is submitted through the Registry. We also support the ministry in their policy development by providing the data we collect when needed.</p>
<p>Is it correct that there are thresholds that can remove the obligation to register? For example, if under the threshold, a producer needs to keep track of their waste but does not need to report?</p>	<p>Yes, that is correct, however, the details of the exemption depend on the specific regulation. Producers who think they may be exempt under a regulation are encouraged to confirm with the Compliance Team at 833-600-0530 or registry@rpra.ca.</p> <p>If you are a producer who is required to register with the Authority under the regulation, you will be required to pay a Registry fee. If you are a producer that is exempt from registering, you will not be required to pay the associated Registry fee.</p>
<p>Can our PRO pay RPRA registration fees on behalf of our company (and the PRO invoices us with our regular fees)?</p>	<p>That is up to the producer and their PRO. RPRA's Registry fees must be paid through the producer's Registry account, but the producer has the freedom in terms of how they manage their account (i.e., adding their PRO as an account user). Regardless of the arrangement between a producer and their PRO, it is the producer's obligation to ensure that the fee gets paid.</p>
<p>Will we receive guidance on how to transition to RPRA and a recap of reporting obligations?</p> <p>If we are obligated under the Blue Box and HSP regulations, will we be notified?</p>	<p>As part of the registration campaigns for both Blue Box and HSP, we will be providing detailed guidance to parties obligated under the regulations on how to register, report and pay fees. We will also continue to develop supporting materials like registration/reporting guides, FAQs and compliance bulletins and make them available on our website.</p>
<p>When is the registry fee invoice due to RPRA once a producer has registered?</p>	<p>Registry fee invoices are considered due on receipt. This means that once a registrant has completed an activity in the Registry with which a fee is associated, such as an initial registration or submitting their annual supply report, payment for the related invoice is due immediately. Clear payment instructions will be provided by RPRA at the time of registration/reporting.</p>

<p>Can you share the cost-benefit analysis we are told was completed for the Registry? If not, why not in the context of OECD principles of ‘transparency’, especially those who have to pay 100% of the costs, that is of course, ‘producers’ - the obligated stewards under the Act?</p>	<p>The Authority’s legislative framework (s. 50 of the RRCEA) requires the Authority to establish and operate an electronic Registry system. As such, a cost-benefit analysis to determine whether the Authority should build a Registry system is not applicable and therefore was not commissioned.</p> <p>With regard to different platforms on which the Registry could be built, the Authority assessed the viability of adapting existing data systems operated by Industry Funding Organizations and other regulators in different jurisdictions and concluded the costs would exceed the option of building out a new system that could address the Authority’s requirements for scalability, flexibility and security. The Authority initiated a procurement process for prospective vendors to propose Registry solutions that could effectively and efficiently address the Authority’s regulatory mandate.</p> <p>With regard to the OECD principles, the transparency principle refers to the Authority’s consultations and specifically a commitment to “Record feedback, report back a summary to stakeholders, and synthesize feedback into programs and policies as appropriate,” which this FAQ and the to-be-finalized Consultation Report will do.</p>
<p>Why not allow stewards to report and pay the Registry Fee through their PRO? It seems like double reporting (RPRA and PRO) is unnecessary red tape.</p>	<p>The Blue Box and HSP regulations that were approved by the Government of Ontario require producers to report certain information to RPRA. This information must be reported to RPRA as a matter of law. Producers are free to establish their own commercial arrangements with PROs, including scope of services offered, prices for those services, and what information the PRO needs from the producer.</p> <p>The decision to make producers pay fees and cover RPRA’s costs was made to reflect the fact that the RRCEA is based on a producer responsibility framework. Although producers may hire PROs or service providers to help meet their obligations, the responsibility for performance under this framework remains with the producer. We believe that making producers responsible for the costs of administering the programs aligns with this framework.</p> <p>RPRA’s Registry fees must be paid through the producer’s Registry account, but the producer has the freedom in terms of how they manage their account (i.e., adding their PRO as an account user). Regardless of the arrangement between a</p>

	producer and their PRO, it is the producer's obligation to ensure that the fee gets paid.
What is your timeline for delivering online portals?	<p>We are currently in the final development phase of the electronic Registry portals for batteries and information technology, telecommunications and audio-visual (ITT/AV) equipment. The portals are scheduled to be operational later this summer.</p> <p>We are in the early project phases for the remaining programs – lighting, HSP and Blue Box – and will update stakeholders as these portal projects progress.</p>

Proposed fees for Blue Box materials

Question	Response
Is the ">=100,000kg of paper/packaging" threshold referring to only "paper/packaging" or does it include all materials currently reported to Stewardship Ontario (i.e., including all other materials e.g., plastic, steel, glass, aluminum, etc.)?	The Blue Box Registry fees are for all materials that are obligated under the Blue Box Regulation, which includes materials currently reported to Stewardship Ontario. However, the regulation obligates new materials as well (e.g., unprinted paper, packaging-like products, service accessories, etc.).
<p>While weight is one cost driver behind the Blue Box recycling system, it is not the main cost driver under the current SO formula and is unlike to be the main driver behind PRO pricing.</p> <p>To put a point on that – the 2017 Pay-in-Model highlights how paper's aggregated tonnage is 64.7% but pays only 47.9% of costs. Similarly, the much lighter plastics weight only 21.5% of aggregated tonnage but pay 46.1% of today's system costs. This cost/weight discrepancy is to reflect that curbside collection fills up based on volume</p>	<p>RPRA's proposed Registry fees are weight-based because under the Blue Box and HSP regulations producers are obligated to report by weight, which makes it an efficient way to assign a variable fee to producers for all material categories covered by those regulations. The regulations do not require that costs information be reported into the Registry. A weight-based approach to fee payment is also consistent with the regulatory program for Blue Box and HSP mandated by the government and its objectives, which expects both supply and performance to be reported and measured on a weight basis.</p> <p>RPRA has considered other approaches to fee setting, and we encourage stakeholders to submit comments and alternative approaches for us to consider.</p>

<p>of material, and not simply based on a materials density.</p> <p>A flat fee by kg harms paper, at the expense of lighter weight materials. In addition, a flat fee by kg is counter to the principal of EPR, as easy-to-recycle materials generally have a higher density than hard-to-recycle materials.</p> <p>Would RPRA consider assigning the fee as a percentage cost increase on the bill, rather than by tonne? My quick math shows the 0.38 cents/kilo fee equates to a 3.2% increase to bills.</p>	
<p>As Ontario municipalities transition to full EPR over a three-year period and continue to pay 50% of Blue Box costs until they transition, how will RPRA determine steward dues? Will fees be pro-rated as additional municipalities transition? Or, will all stewards simply start paying based on 100% EPR effective July 1, 2023?</p>	<p>During the transition period, stewards obligated under the Blue Box Program Plan and WDTA will continue to fund approximately 50% of the cost of operating the Blue Box Program. The amount stewards pay each year is calculated using information obtained from the Datacall, which surveys municipalities, First Nation communities and recycling associations on costs and amount of material collected through the Blue Box Program. As municipalities transition to the new framework/RRCEA, they will no longer report into the Datacall, which will have an impact on the overall cost of operating the program. For more information on the transition, including impacts on steward payments, visit Stewardship Ontario's website, or direct any operational inquiries to: werecycle@stewardshipontario.ca.</p> <p>Producers obligated under the new regulation will also be required to meet their obligations under the RRCEA, which includes registering, reporting and paying their Registry fee to RPRA.</p>
<p>Is it correct that Blue Box stewards will pay \$3.51 million in 2021 alone? If so, what do the blue box stewards get for \$3.5 million? I did not think the Registry is developed yet. Same question for the HSP stewards, as we</p>	<p>Yes, \$3.51 M is the allocated budget for Blue Box in 2021. This covers the cost of administering the Blue Box Regulation in 2021, which includes helping obligated producers understand their requirements, ensuring producers register and report their supply data by the deadline in the regulation, ensuring municipalities understand what they need to report and submit the correct information as</p>

<p>thought it was an Excel sheet for the Registry to date.</p>	<p>outlined in the regulation, and the associated compliance, enforcement and communication activities.</p> <p>We will be implementing a manual registration process for both Blue Box and HSP as those online registries are not yet built, but in the absence of an online Registry, there is still a lot of work to be done to ensure obligated parties understand and meet their regulatory obligations.</p>
<p>My organization has been already registered as a producer under the Blue Box Program since 2018. Do we need to register again and pay the \$75 flat fee / \$0.0038 per kg fee in 2021? If so, how should we do so?</p>	<p>Yes, producers obligated under the new Blue Box Regulation must register and pay their associated Registry fee (based on 2020 supply data) to RPRA by October 1, 2021. RPRA will provide detailed guidance to producers on how to register, report and pay their Registry fee ahead of the deadline.</p> <p>During the Blue Box Program transition (ending December 31, 2025), stewards will still be obligated and have to meet their requirements (e.g., reporting and paying fees) under the Blue Box Program Plan and the WDTA, as well as their requirements under the Blue Box Regulation.</p>
<p>If I did the math right, 101,000 kg would pay \$380 but 99,000 kg would pay \$75. Is that reasonable?</p>	<p>The Authority maintains a mixed variable and fixed fee model because it believes this fee structure supports equity in fees, in particular for small and medium-sized businesses. The fixed fee cut-off seeks to achieve fairness for small businesses by reducing regulatory burden associated with fees on small businesses. A difference between the fixed fee amount and the variable amount at the cutoff is inevitable. Stakeholders are encouraged to submit alternative thresholds for the Authority to analyze and consider.</p>
<p>What is the ratio of current Blue Box costs in terms of Registry development costs and transition costs being charged to producers until the start of the program in 2023?</p>	<p>RPRA's Registry fees for Blue Box in 2021 are based on the RRCEA budget for the program in 2021 of \$3.51 M. The Registry fees for 2022 will be consulted on later this year. RPRA's Registry fees cover the costs to build and operate the Registry and the compliance and enforcement activities required to administer the regulations under the RRCEA, and all of the support functions related to those activities.</p> <p>During the transition of the legacy Blue Box Program (July 1, 2023, to December 31, 2025), stewards will still be obligated and have to meet their requirements (e.g., reporting and paying fees) under the Blue Box Program Plan and the WDTA, as well as their requirements under the Blue Box Regulation.</p>

<p>As we work through our budgeting processes, how can we determine how much we will pay over the next few years for Blue Box fees in Ontario?</p>	<p>RPRA's fee setting objectives include ensuring a transparent fee setting process, fees are reasonable and reflect costs incurred by the Authority, and fee predictability for regulated parties. Currently, RPRA sets Registry fees on a yearly basis, which is particularly necessary as RPRA continues to grow to develop its current Registry programs and to establish new Registry programs as mandated by the government. RPRA intends to consult on 2022 Registry fees later this year. In future years, as the growth in the Authority's programs is anticipated to stabilize, fee setting could occur at longer intervals.</p>
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Proposed fees for HSP

Question	Response
<p>As it seems based on the weight-based approach, paint producers will be paying more to RPRA than they pay the PRO for administering the entire program in Ontario. How is that allocation fair, rational, or per OECD principle - sustainable - when consumers will have to pay more in what is effectively a tax (flowing from requirements under the RRCEA - including the regulation under that Act) for eco fees than for program operations focused on waste recovery?</p>	<p>Typically, RPRA's Registry fees represent a portion of the overall cost for producers to establish and operate a collection and management system. This is the case for the proposed HSP Registry fees.</p> <p>The total program cost to stewards for the Municipal Hazardous or Special Waste (MHSW) Program in 2020 was approximately \$42.7 M, as reported in the IFO/ISOs Q4 Quarterly Reports. The total cost to paint and coatings stewards in 2020 was \$17.7 M. This compares to RPRA's total program allocation of \$1.9 M for all HSP material categories in 2021, which the proposed HSP fees seek to recover.</p> <p>RPRA's Registry fees are unrelated to the costs of administering a collection and management program. RPRA's Registry fees cover the costs of RPRA's mandate under the RRCEA. This includes the costs of enforcing the HSP Regulation to ensure producers, PROs, service providers and other obligated parties meet all of their requirements, as well as the cost to publicly report out on performance information that is submitted through the Registry.</p>
<p>How many producers are expected to register for HSP?</p>	<p>As outlined in the proposal, our assumptions for the number of HSP producers are:</p> <ul style="list-style-type: none"> • Category A and B: 225

	<ul style="list-style-type: none"> • Category C and E: 40 • Category D: 8 <p>We encourage stakeholders to provide feedback on these assumptions during this consultation process.</p>
<p>Why are fees weight-based and how does that approach reflect RPRA's functions/expenses? This is unfair as it favours Styrofoam vs. metal, for example.</p> <p>If the fees are weight-based, why would a consumable product like paint have the fee based on the weight sold versus the weight that is actually managed? Only 10% (maximum) of paint sold is recovered, compared to oil filters which are heavier at end of life than when sold. Then there are products like oil containers, sold full of oil, (which is not a designated product in ON) and only the container weight is counted.</p> <p>Given that you are focused on weight-based approach for materials, it seems paint will be paying 68% of the total HSP fees. Again, the problem with the weight-based approach. How does RPRA explain this very unfair allocation of costs?</p> <p>The weight-based approach means paint will pay approximately \$1.3 M of the entire HSP program, despite the fact that only 7 percent of leftover paint is recovered. How is that fair?</p>	<p>The Authority maintains a mixed variable and fixed fee model because it believes this fee structure supports equity in fees, in particular for small and medium-sized businesses. The variable component of the fee model also supports the objectives of the Ontario government's producer responsibility regulatory framework to hold producers individually accountable and financially responsible for the products and packaging they supply into the market.</p> <p>Under the Blue Box and HSP regulations, producers are required to submit their supply data by weight to RPRA annually. One of the reasons we propose using a weight-based approach to fee setting is because it is an efficient way to assign a variable fee to producers based on the data that they are required to report to us. Another reason is to ensure fee predictability for producers, and we believe this current approach helps achieve that. In addition to being consistent with the information that producers are required to report to RPRA, a weight-based fee allows a variable fee to be applied consistently to all materials covered by the fee, some of which do not have unit-based data. Additionally, a weight-based approach to fee payment is consistent with the regulatory program for HSP mandated by the government and its objectives, which expects both supply and performance to be reported and measured on a weight basis.</p> <p>In all of RPRA's Registry programs, the variable fee is proposed to be weight-based, except for the Tires program. Under the Tires Regulation, unlike the other regulations that RPRA implements, producers are required to report both weight and units supplied.</p> <p>We encourage stakeholders to provide written feedback and/or alternative approaches (i.e., based on managed amounts) during this consultation process.</p>

<p>When will the HSP Registry be available for registration for producers and PROs?</p>	<p>RPRA will be implementing a manual registration campaign for all obligated parties under the HSP Regulation as the online Registry is not yet built. Registration for PROs is now open. Those interested in registering as an HSP PRO should contact our Compliance and Registry Team at 833-600-0530 or registry@rpra.ca. RPRA will notify producers and service providers when their registration opens.</p>
<p>Tires fees are based on 'per tire'. Why not the same for HSP products?</p> <p>Why are HSP fees calculated by weight of the contents and/or container but for tires, fees are calculated per tire?</p>	<p>In all of RPRA's Registry programs, the variable fee is proposed to be weight-based, except for the Tires program. Under the Tires Regulation, unlike the other regulations that RPRA implements, producers are required to report both weight and units supplied.</p> <p>Under the HSP Regulation, one of the reasons we use a weight-based approach to fee setting is because it is an efficient way to assign a variable fee to producers based on the data that they are required to report to us. Another reason is to ensure fee predictability for producers, and we believe this current approach helps achieve that. In addition to being consistent with the information that producers are required to report to RPRA, a weight-based fee allows a variable fee to be applied consistently to all materials covered by the fee, some of which do not have unit-based data. Additionally, a weight-based approach to fee payment is consistent with the regulatory program for HSP mandated by the government and its objectives, which expects both supply and performance to be reported and measured on a weight basis.</p>
<p>For the HSP fee, is this based on the contents of say a paint can as opposed to Blue Box where it is based on the weight of the container?</p> <p>How are fees calculated for refillable cylinders?</p>	<p>RPRA's proposed 2021 Registry fees for HSP and Blue Box are calculated based on a producer's supply data. Producers are required to report on the weight of what they supply into the Ontario market to the Authority each year and this data is used to establish an individual producer's collection requirement for the following year, and to set fees. Please contact our Compliance and Registry Team with questions about what you are obligated to report and other questions about your obligations under the regulation.</p>
<p>Why are we paying two separate programs for paint? If we are paying for the paint to be recycled, and therefore, I would assume that the cans with a bit of paint cannot be put in</p>	<p>RPRA does not decide what material is obligated under the regulations. Each regulation developed by the Ministry of the Environment, Conservation and Parks and approved by the government outlines the obligated parties and their requirements, including registration and reporting with RPRA.</p>

<p>the blue box, our products should not be in the Ontario Blue Box Program.</p>	
<p>Are the HSP fees based on 2020 sales?</p>	<p>RPRA's 2021 Registry fees for HSP producers in Categories A and B (includes non-refillable and refillable pressurized containers, oil filters, antifreeze, oil containers, paints and coatings, pesticides, and solvents) are based on an average of their supply data from 2018, 2019 and 2020, which they are required to submit to RPRA under the HSP Regulation later this year.</p> <p>RPRA has proposed a flat fee for producers in Categories C and E (includes barometers, thermometers, thermostats and refillable propane containers) and D (includes fertilizers) as they do not have to report supply data in 2021.</p>
<p>Under new regulation, the math for 10,000 tonnes will be \$1.3 million, plus \$300,000 for RPRA enforcement and compliance, so \$1.6 million. Is this fee based on what RPRA needs to spend, no matter who pays?</p>	<p>As an administrative authority of the Government of Ontario, the Authority operates on a cost-recovery basis and its budget reflects costs necessary to deliver its legislated mandate. Our Registry fees cover the cost of building and operating the Registry, the compliance and enforcement activities required to administer regulations under the RRCEA, and all of the support functions related to those activities. We are also required to publicly report on performance data that is submitted through the Registry, and we support the ministry in their policy development by providing the data we collect when needed.</p>