



2027 RPRA Program Fees

Consultation Report

October 8, 2026

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Executive summary

The Resource Productivity and Recovery Authority (RPRA) is Ontario's circular economy regulator mandated to enforce the province's producer responsibility laws. RPRA oversees resource recovery programs for used tires; batteries; information technology, telecommunications and audio-visual equipment (ITT/AV); lighting; hazardous and special products (HSP); and Blue Box materials. RPRA also operates registries for Ontario's reporting and tracking programs for excess soil and industrial and liquid hazardous waste.

This report details RPRA's consultation process, the feedback received, and how RPRA incorporated the feedback into its decision-making on setting its 2027 program fees for:

- (i) Producer responsibility programs under the *Resource Recovery and Circular Economy Act, 2016* (RRCEA), which include fees for producers of Blue Box materials; HSP; ITT/AV and batteries; lighting; and tires; and
- (ii) Users of the Hazardous Waste Program (HWP) and Excess Soil registries

RPRA's fees are charges that registrants pay to RPRA to cover its costs for operating compliance and enforcement programs for producer responsibility programs, building and operating registries, and supporting registrants. [RPRA's General Fee-Setting Policy](#) guides how fees are set in accordance with a list of principles and objectives.

Producers obligated under RRCEA regulations are required to report their supply data and pay the associated fee to RPRA.

HWP registrants are required to use the HWP Registry and pay fees to RPRA for each manifest registered (invoices are sent monthly).

Excess Soil registrants are required to use the Excess Soil Registry and pay fees to RPRA based on the notices filed.

From June 30 to August 14, 2026, [RPRA consulted](#) on the proposed 2027 program fees. The consultation included the fee models and rates for each program.

The consultation feedback included concerns regarding the proposed overall budget increase and fee rate increases to support report auditing and verification, the proposed application of program budget surpluses, and comments regarding potential effects of multi-year fee setting scenarios presented in the 2027 program fee proposal for information. Feedback from consultation participants informed the development of final 2027 fees and the final 2027 budget. The final budget approved by the board is \$200,000 less than what was communicated in RPRA's original 2027 fee proposal.

The budget reduction and other minor adjustments resulted in lower 2027 variable fee rates for Tires, Blue Box, Batteries, HSP Paints and Coatings, HSP Antifreeze and HSP Oil Filters compared to the rates proposed in June. The table below displays 2026 variable fee rates for producer responsibility programs alongside the originally proposed 2027 fee rates and the final 2027 fee rates, as well as the percent changes between 2026 and 2027 rates.

2026, 2027 proposed, and 2027 final fee rates for producer responsibility programs

Program / material	Producer type	Fee type	Final 2026 rate	Proposed 2027 rate	Proposed 2026-2027 rate change	Final 2027 rate	Final 2026-2027 rate change
All	Small	Fixed	\$ 95	\$ 95	0%	\$95	0%
Tires	Large	Variable	\$ 0.210	\$ 0.219	4%	\$0.216	3%
Batteries	Large	Variable	\$ 0.040	\$ 0.043	8%	\$0.042	4%
ITTAV (fee holiday)	Large	Variable	\$ -	\$ -	0%	\$ -	0%
Blue Box	Large	Variable	\$ 0.0097	\$ 0.0109	12%	\$0.0107	10%
Lighting	Large	Variable	\$ 0.193	\$ 0.197	2%	\$0.197	2%
HSP – antifreeze	Large	Variable	\$ 0.025	\$ 0.026	6%	\$0.025	0%
HSP – oil filters	Large	Variable	\$ 0.078	\$ 0.079	1%	\$0.078	0%
HSP – oil containers	Large	Variable	\$ 0.109	\$ 0.109	0%	\$0.109	0%
HSP – paints and coatings, solvents, etc.	Large	Variable	\$ 0.0110	\$ 0.0120	9%	\$0.0116	6%
HSP – mercury containing products	Large	Fixed	\$ 7,875	\$ 8,270	5%	\$8,270	5%
HSP – fertilizer	Large	Fixed	\$ 1,050	\$ 1,100	5%	\$1,100	5%
HSP – refillable propane containers and refillable	Large	Fixed	\$ 1,050	\$ 1,100	5%	\$1,110	5%

Pressurized containers							
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HWP and Excess Soil fee rates are unchanged from what was proposed in June and have not changed from 2026. Final fee rates are displayed in the table below, alongside final 2026 rates and the percent changes from 2026 to 2027.

2026 and 2027 final fee rates for HWP and Excess Soil registries

HWP	Fee type	Final 2026 rate	Final 2027 rate	2026-2027 rate change
Manifest	Fixed	\$ 6	\$ 6	0%
Tonnage	Variable	\$ 30	\$ 30	0%
Excess Soil	Fee type	Final 2026 rate	Final 2027 rate	2026-2027 rate change
Project Area 100-2,000m ³	Fixed	\$ 95	\$ 95	0%
Project Area 2,001-10,000m ³	Variable	\$ 0.146	\$ 0.146	0%
Project Area 10,001-50,000m ³	Variable	\$ 0.182	\$ 0.182	0%
Project Area 50,001-100,000m ³	Variable	\$ 0.349	\$ 0.349	0%
Project Area 100,001-500,000m ³	Variable	\$ 0.437	\$ 0.437	0%
Project Area >500,000m ³	Fixed	\$ 218,400	\$ 218,400	0%
Reuse Site 10,000-50,000m ³	Fixed	\$ 3,710	\$ 3,710	0%
Reuse Site 50,001-1,000,000m ³	Fixed	\$ 14,820	\$ 14,820	0%
Reuse Site 1,000,001-5,000,000m ³	Fixed	\$ 34,575	\$ 34,575	0%
Reuse Site >5,000,000m ³	Fixed	\$ 49,395	\$ 49,395	0%

Residential Development Soil Depot	Fixed	\$ 1,235	\$ 1,235	0%
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RPRA's 2027 Program Fees were approved on September 23, 2026. RPRA posted the final fees to its website on October 8, 2026, and stakeholders were notified the same day.

RPRA received 18 written submissions in response to the fee proposals. The comments are summarized in [What We Heard](#), and RPRA's responses are detailed in [Appendix B](#) of this report.

All questions received during the consultation webinars and responses provided by RPRA are detailed in [Appendix C](#) of this report.

For more information on the final fee rates, review the [2027 fee schedule](#).

Introduction

About RPRA

RPRA 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).

RPRA was also directed by the Minister of the Environment, Conservation and Parks to build and operate registries for the Hazardous Waste and Excess Soil programs under the [Environmental Protection Act, 1990](#) (EPA).

The RRCEA establishes a resource recovery regime where producers are individually accountable and financially responsible for their products and packaging through their full life cycle. The WDTA allows for the continuation of legacy waste diversion programs and sets out provisions to wind up those programs as directed by the Minister of the Environment, Conservation and Parks.

RPRA is a non-profit organization that does not receive any government funding. RPRA recovers its costs by setting and collecting program fee revenues from three sources:

- 1. Producer responsibility program registrants**

Fees to producers that are required to register and report to RPRA under the RRCEA regulations.

- 2. Excess Soil and Hazardous Waste Program registrants**

Fees to parties obligated to register and report through RPRA's Excess Soil and Hazardous Waste Program (HWP) registries. The Ministry of the Environment, Conservation and Parks is responsible for compliance activities related to these programs.

3. Legacy waste diversion programs under the Waste Diversion and Transition Act, 2016 (WDTA)

Monthly cost recovery charges to industry funding organizations (IFOs).

Fees are used to cover the costs of developing and operating registry services, registrant support services for all programs, and compliance and enforcement activities.

Before setting fees, RPRA is required to consult publicly for at least 45 days and post the fees on its website for 30 days.

Principles for public consultation

RPRA'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

RPRA consulted on the proposed 2027 program fees from June 30 to August 14, 2026. A [dedicated web page](#) was created on RPRA's website with background information on the consultation, registration links for five webinars held in mid July and the presentation materials and recordings from those webinars after they had concluded.

On June 30, 2026, RPRA announced the launch of the consultation for the proposed 2027 program fees with details on how to participate via email to:

- Producers, producer responsibility organizations (PROs) and industry associations involved in producer responsibility programs overseen by RPRA
- Users in the Excess Soil Registry
- Generators and Authorized Generator Delegates (AGDs) for the Hazardous Waste Program (HWP)

This email reached over 49,786 registrants and stakeholders, and invited them to attend one of the five webinars, and submit feedback on the proposed fees during the webinars or via email.

Feedback on the fee proposal was solicited from RPRA's advisory councils during meetings held on July 6 and 7, 2026.

For the first time in 2026, RPRA aligned the fee setting process with the business planning process, conducting both in parallel over the spring and summer months. In previous years, RPRA concluded business planning in September and subsequently consulted on fees in October and November, publishing final fee rates in December. The new timeline for fee setting enables RPRA to maximize flexibility in response to stakeholder feedback on our budget, business plan and proposed fees, and to post final fees in October.

What we heard

RPRA considered feedback received through 18 written submissions, meetings with RPRA's advisory council members, and the five webinars listed below, which attracted over 300 participants in total:

- HWP webinar held on July 14, 2026 – 53 participants
- Electronics, lighting and batteries webinar held on July 15, 2026 – 61 participants
- Tires webinar held on July 16, 2026 - 48 participants
- HSP and Blue Box webinar held on July 21, 2026 – 108 participants
- Excess soil webinar held on July 22, 2026 – 37 participants

RPRA also requested feedback from consultation participants on potential multi-year fee-setting scenarios. The feedback will be considered as part of RPRA's ongoing Cost Allocation and Fee Setting Methodology Review.

Key feedback RPRA received on proposed 2027 program fees and potential multi-year fee-setting scenarios is summarized below. Feedback that was not relevant to this consultation has been excluded from the summary. A more detailed description of feedback received and RPRA's response is in [Appendix B](#).

Multi-year fee setting scenarios

RPRA received comments both in support of multi-year fee setting and in support of continuing to set fees annually. Those who opposed multi-year fee setting cited risks to sustainability if fee rates are locked in when regulations or market conditions change unexpectedly, resulting in unanticipated costs to RPRA and/or impactful changes to supplied volumes (on which variable fee rates are based). Stakeholders who supported annual fee consultations cited the following benefits:

- Reduced risk of surplus or deficit accumulation and, by extension, substantial fee increases if a large deficit develops
- Greater transparency and accountability
- Fees can reflect program needs and realized efficiencies year to year

Some stakeholders supported multi-year fee setting to increase fee predictability but noted that future-year fees should remain subject to annual review and confirmation based on updated costs and program needs, and requested that RPRA set fees conservatively, allow for mid-term corrections, and provide a clear rationale for the multi-year fee rate, using an agreed-upon forecasting methodology.

RPRA presented two three-year fee scenarios for stakeholder consideration: a relatively higher fee rate, frozen for three years; or a relatively lower initial year fee rate, with second- and third-year rate increases capped to a maximum increase. Of the two scenarios, stakeholders in general preferred the former: a lower initial year rate, with capped increases in years two and three.

Timing of the RPRA fee consultation

- Stakeholders expressed their support for RPRA moving the fee-setting process earlier in the calendar year to coincide with business planning, noting that the adjustment will better align with registrant business planning cycles and provide more time for registrants to make budget adjustments, if required.
- One stakeholder requested that RPRA assess, over the next one to two years, whether providing fee information earlier in the year, as was done this year, gives producers sufficient time to plan for annual fee changes without requiring a move to multi-year fee-setting.

Cost allocation methodology

- Registrants in the Blue Box and tires programs said they are concerned that they are paying more than their share of indirect costs. They requested clearer insight into cost drivers and enforcement outcomes (e.g., revenues from administrative penalties), and a complete breakdown of each program's cost allocation and revenue requirement.

Application of program surplus

- Some stakeholders requested that RPRA consider applying additional program-specific surplus funds to further reduce those programs' 2027 fee rates, where possible.
- Stakeholders requested that RPRA more clearly communicate its policy or protocol deciding how to apply program surplus funds against revenue requirements.

Budget/cost containment

- Stakeholders advocated for RPRA to ensure detailed planning is completed prior to budget-setting to ensure we add additional resources only when absolutely required. They asked RPRA to contain costs and keep fees as low as possible given the challenging economic climate and high overall costs to comply with Ontario's EPR programs.
- Stakeholders expressed support for investments in audit and verification capabilities but have requested metrics be published to measure the impact of this investment on improving data accuracy and compliance outcomes. Stakeholders suggested the following metrics for consideration:
 - The number of free riders identified by program, filtered for compliance outcomes
 - The tracking of captured free rider tonnage and its impact on program costs
 - Year-over-year tracking for registry usage rates by program
 - Other metrics to support the transparent tracking of the Audit and Verification team's effectiveness.
- Some stakeholders are particularly worried that hiring additional FTEs is not cost-effective and that RPRA's proposed budget includes more resources than needed. These stakeholders believe that more cost-effective solutions exist through automation, re-allocating existing resources, and increasing investment in producer education (e.g., reporting guidance and other registrant support materials).
- Stakeholders requested that RPRA staff continue to develop an education-first approach to compliance and enhance our outreach efforts, such as; pre-filming webinars or proactive education sessions, clear reporting guidance materials, common reporting-error FAQs, training sessions, and other reporting supports. These proactive outreach and education activities could improve data quality and compliance outcomes while reducing costs for both the regulator and producers.
- One stakeholder recommended that RPRA implement a hiring freeze.
- Several stakeholders noted that, while projected spending for 2027 is lower than originally forecast given the current economic climate, they do not support the originally proposed overall budget increase because it remains above inflation.
- Several stakeholders expressed concern with rising fees and program costs.

Blue Box program fee increase

- Several stakeholders expressed concern that costs for the Blue Box program continue to grow, even though 2027 will be the second year of since the province completed transition from the legacy program to producer responsibility under the RRCEA.

- One stakeholder suggested that RPRA implement a +/- 10% fee fluctuation threshold for annual rate changes.

Administrative Penalty Revenues Policy and application

- Several batteries stakeholders requested that RPRA apply administrative penalty revenues collected from parties that were non-compliant with requirements of the Batteries regulation in order to reduce or eliminate the proposed 2027 fee for batteries producers.
- Several Blue Box stakeholders supported RPRA applying administrative penalty revenues to help offset program costs for compliant producers. A few Blue Box stakeholders requested that RPRA further develop its administrative penalty fund policy to ensure revenues are applied to provide direct support to producers compliant with the Blue Box regulation without providing unintended fiscal benefits to non-compliant entities.

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

[Appendix B](#) outlines RPRA's responses to comments provided during the consultation.

For a list of all questions received during the webinars presented in July, see [Appendix C](#).

Conclusion

RPRA's 2027 program fees were approved on September 23, 2026. RPRA posted the final fees to its website on October 8, 2026, and stakeholders were notified the same day.

RPRA appreciates the thoughtful feedback provided through the consultation process and considered each submission in setting 2027 program fees.

RPRA's [2027 Business Plan](#) includes a budget of \$30.8M, 3.6% or \$1.1M above 2026 budget, which is 3% lower than the 2027 forecast, and 0.8% lower than the increase proposed in June. This budget includes the realization of \$1.4M of efficiencies and savings. In response to stakeholder feedback, RPRA reduced its originally proposed 2027 budget by phasing new investments and realizing further savings. The final budget approved by the board is \$200,000 less than what was communicated in RPRA's original 2027 fee proposal.

The budget reduction and other adjustments resulted in lower 2027 variable fee rates for Tires, Blue Box, Batteries, HSP Paints and Coatings, HSP Antifreeze and HSP Oil Filters compared to the rates proposed in June.

The consultation feedback informed the final fees on the following basis:

- **Tires**
 - The application of additional program surplus and a change to estimated supply volumes reduced the tires program variable fee rate increase from the proposed 4% to 3% over the 2026 rate
- **Blue Box**

- RPRA's overall budget reduction and a small increase in estimated Blue Box supply volumes reduced the Blue Box program variable fee rate increase from the proposed 12% to 10.4% over the 2026 rate
- **Batteries and ITT/AV**
 - RPRA's overall budget reduction and a small increase in estimated supply volumes reduced the batteries program variable fee rate increase from the proposed 8% to 4%
 - The ITT/AV revenue requirement for 2027 is again being recovered from OES surplus funds, as in 2026. This results in ITT/AV producers once again having a fee holiday in 2027 and will not be required to pay 2027 program fees.
- **HSP**
 - RPRA's overall budget reduction and a small increase in estimated HSP supply volumes reduced the HSP program variable fee rate increases for:
 - Paints, coatings, solvents, and pressurized containers from the proposed 10% to 6%
 - Antifreeze from the proposed 6% to 0%
 - Oil filters from the proposed 1% to 0%

With regard to the application of administrative penalty (AP) funds recently received from non-compliant parties in the batteries program, the timing of the resolution of the appeal and our receipt of the funds (late August 2026) did not leave sufficient time for RPRA to plan for and consult on the application of the funds towards our 2027 revenue requirement. As such, the surplus application for 2027 remains unchanged at \$462,505—the full remaining balance available to the program. RPRA will consult on applying these AP funds towards 2028 revenue requirements in the summer of 2027 when consulting on fees.

Appendix A: Stakeholders that submitted feedback

Eighteen submissions were received from the following stakeholders:

- Canadian Beverage Association (CBA)
- Canadian Consumer Speciality Products Association (CCSPA)
- Canadian Vehicle Manufacturers Association (CVMA)
- Canadian Tire Corporation
- Duracell
- Energizer Canada
- Food Health and Consumer Products (FHCP) Canada
- Lactalis Canada
- Metrolinx
- Nissan Canada
- Panasonic Canada
- Region of Waterloo
- Restaurants Canada
- Retail Council of Canada (RCC)
- The City of Toronto
- Tire and Rubber Association of Canada (TRAC)
- TRACE Associates
- Wakefield

Appendix B: Response to stakeholder feedback

RPRA considered all feedback received during the consultation period. Key comments received and RPRA's responses are included below. Stakeholders with specific questions about fees that are not addressed in this consultation report were contacted directly by RPRA staff.

Timing of the RPRA fee consultation

Stakeholders expressed their support of advancing the fee-setting cycle to earlier in the calendar year and before the business plan and budget are finalized, noting that the adjustment will better align with business planning cycles and provide more time to make any required budget adjustments before the end of the year.

One stakeholder requested that RPRA assess, over the next one to two years, whether providing fee information earlier in the year gives producers sufficient time to plan for annual fee changes and eliminates the need for multi-year fee-setting.

RPRA's response

The earlier scheduling of RPRA's fee consultation, which responded to stakeholder requests for more meaningful consultation on budget and fees earlier in the year, allowed participant feedback to be considered prior to the finalization of RPRA's business plan and budget, from which program fees are derived.

The feedback received in response to the scheduling change will be considered as RPRA continues to review its fee-setting methodology and processes.

Cost allocation methodology

Several stakeholders expressed concern with rising fees and program costs, and the distribution of indirect/shared costs. Registrants in the Blue Box and tires programs in particular are concerned about their programs' shares of indirect costs, and requested clearer insights into cost drivers, revenues collected as a result of enforcement, and a complete breakdown of each program's allocation and revenue requirement.

RPRA's response

The [2027 fees proposal](#) provided a breakdown of each program's revenue requirement for 2027, including direct costs, program allocation of indirect and shared costs, start-up and reserve recoveries, application of program surpluses and administrative penalty revenue where applicable.

RPRA assigns staff roles and responsibilities according to a shared service model. Under this model, roles and responsibilities for a given staff member are not restricted to one or a couple of programs but rather work toward RPRA's three strategic goals – registry service, compliance and enforcement, and public reporting – across all programs. This model is the most efficient in terms of the number of full-time employees RPRA requires and helps RPRA efficiently manage fluctuations in activity levels throughout the year and from year to year (e.g., calls, emails, case

interactions, enforcement, procedures, regulation implementation, system-wide compliance and verification).

Shared service costs and indirect costs are allocated to RPRA's registry programs according to defined cost drivers, such as the number of registrants in a program. The larger allocation of indirect and shared costs to the Blue Box and tires program relative to other producer responsibility programs is a result of their comparatively large number of registrants. Direct (program-specific) costs are allocated only to the programs they impact. The 2027 revenue requirement for Blue Box includes direct costs for additional resources to help implement new phases of the Blue Box program that require dedicated resources (e.g., audit and verification requirements).

The level of compliance activity by program does not meaningfully impact shared or indirect costs, but direct costs are impacted by legal or other fees RPRA could incur in the course of enforcement activities (e.g., if an order or penalty is appealed). RPRA is committed to enhancing our reporting on compliance activities and will continue to add to the list of metrics published to our [website](#) in 2027.

The current review of our cost allocation methodology and fee models includes consideration of cost drivers and allocation calculus. In 2027, staff will conduct a public consultation on any proposed changes to our methodology that arise from the review.

Application of program surplus

Some stakeholders requested that RPRA consider applying additional available program surplus to further reduce 2027 program fees, where possible. Stakeholders also requested that RPRA more clearly communicate its policy for applying program surpluses against program revenue requirements.

RPRA's response

RPRA's approach to applying program surpluses against revenue requirements has been aimed at moderating fee volatility over three or four years. In response to stakeholder requests, RPRA applied additional surplus to the tires program to reduce the 2027 variable fee rate.

The implications and risks of amending RPRA's treatment of surpluses-deficits by material categories will be considered during the fee methodology review project.

RPRA will continue to be transparent about its proposed applications of program surpluses and schedules for recovering deficits. These details were communicated in program-specific consultation webinar decks, which are posted to the consultation webpage, and staff will consider how to expand on these details in future consultations.

Budget/Cost containment

Several stakeholders noted that, while projected spending for 2027 is lower than originally forecast given the current economic climate, they do not support the overall budget increase because it remains above inflation.

One stakeholder recommended that RPRA implement a hiring freeze.

Some stakeholders commented that the hiring of additional staff resources for the Audit and Verification Team build-out is costly and opaque, and expressed concern that hiring additional FTEs may not be as cost-effective as automation, re-allocating existing resources and increasing investment in producer education.

RPRA's response

Cost containment is a focus during RPRA's business planning and budgeting. The 2027 budget includes approx. \$1.4M of savings, efficiencies and cost avoidances that have reduced the annual revenue requirement. Consideration of external economic factors is also incorporated, and RPRA discloses each year's expenditures against budget in its annual report.

In response to stakeholder feedback, RPRA reduced its originally proposed 2027 budget by \$200,000 by phasing new investments and realizing further savings. The budget reduction and other adjustments resulted in lower 2027 variable fee rates for Tires, Blue Box, Batteries, HSP Paints and Coatings, HSP Antifreeze and HSP Oil Filters compared to the rates proposed in June.

RPRA has a mandate to enforce the RRCEA and must recover the costs of doing so each year. Staff acknowledge the magnitude of the broader system costs of producer responsibility in Ontario and Canada. At the same time, RPRA's registry service, compliance and enforcement, and public reporting activities are key to ensuring producer responsibility laws and programs work fairly for registrants and result in their intended outcomes.

The producer responsibility regulations under the RRCEA continue to undergo refinement by the Ontario government, resulting in frequent amendments. This requires RPRA to adapt to change on an ongoing basis, which translates into incremental direct, indirect, and shared costs to RPRA programs, depending on the nature of the change required.

Our annual consultation with our advisory councils on our budget and business plan enables a dialogue on necessary activities and the costs to fund them. RPRA's planned investments for 2027 in technology, compliance processes and audit and verification resources will make it easier for registrants to register and report, and enable compliance work to ensure a level playing field for our regulated communities.

Blue Box program fee increases

Several stakeholders expressed concern about the rising Blue Box program cost and the year-to-year fluctuations in Blue Box program fees, questioning whether they are proportionate to the growth in the program costs.

RPRA's response

RPRA is mandated to oversee compliance of all regulated businesses under the RRCEA, and to report on the progress of producer responsibility programs. To do so, we need confidence in the accuracy of reports into our registry.

The Blue Box program is the largest producer responsibility program under the RRCEA, with over 2,000 producers. Ensuring complete and accurate reporting by those producers

necessitates additional resources. The Blue Box program will exit the transitional period during which producers are required to make best efforts to meet performance targets in 2026 and 2027. In 2028, producers must meet performance targets to be in compliance with the regulation.

In response to stakeholder feedback, the procurement of additional resources to support verification and auditing of reported data is being spread across three years (2026-2028). This will enable iterative and incremental decision making regarding the resources required over this time-period.

Administrative Penalty Revenues Policy and application

Batteries stakeholders and producers requested that RPRA apply administrative penalty revenues collected from parties obligated under the Batteries Regulation in 2026 to offset the 2027 batteries program revenue requirement and reduce battery program fees.

Blue Box stakeholders supported RPRA applying administrative penalty revenues to help offset Blue Box program costs for compliant producers. Some stakeholders requested that RPRA further develop its administrative penalty fund policy to ensure revenues are applied to provide direct support to compliant producers without providing unintended fiscal benefits to non-compliant entities that were previously penalised.

RPRA's response

The timing of the [resolution of the appeal](#) of the administrative penalty issued to obligated parties under the Batteries Regulation and RPRA's receipt of the funds (late August 2026) did not leave sufficient time to plan for and consult on the application of the funds towards our 2027 revenue requirement. RPRA will consult on applying administrative penalty funds towards the batteries program 2028 revenue requirement in summer 2027.

RPRA applies administrative penalties revenues in accordance with its [Use of Administrative Penalty Revenues Policy](#). As of December 31, 2025, RPRA collected \$161,102 in administrative penalty revenues, which have been restricted and invested in accordance with the board approved policy. In 2027, two years following the collection of the funds, RPRA will apply \$16,000 to help deliver RPRA's Indigenous engagement initiatives, and the remaining amount (\$144K) will be used to offset the revenue requirements for the programs that the penalties relate to (Blue Box and tires).

RPRA's Use of Administrative Penalties Revenues Policy is reviewed every two years. The policy is anticipated to be reviewed in early 2027.

Multi-year fee setting

RPRA received comments both in support of multi-year fee setting, and in support of continuing to set fees annually. Those who opposed multi-year fee setting cited risks to sustainability if fee rates are locked in when regulations or market conditions change unexpectedly, resulting in unanticipated costs to RPRA and/or impactful changes to supplied volumes (on which variable fee rates are based). Stakeholders who supported annual fee consultations cited the following benefits:

- Reduced risk of surplus or deficit accumulation, and by extension substantial fee increases if a large deficit develops
- Greater transparency and accountability
- Fees can reflect program needs and realized efficiencies year to year

Some stakeholders supported multi-year fee setting to increase fee predictability but noted that future-year fees should remain subject to annual review and confirmation based on updated costs and program needs, and requested that RPRA set fees conservatively, allow for mid-term corrections, and provide a clear rationale for the multi-year fee rate, using an agreed-upon forecasting methodology.

RPRA presented two three-year fee scenarios for stakeholder consideration: a relatively higher fee rate, frozen for three years; or a relatively lower initial year fee rate, with second- and third-year rate increases capped to a maximum increase. Of the two scenarios, stakeholders in general preferred the former: a lower initial year rate, with capped increases in years two and three.

RPRA's response

The feedback received in response to multi-year fee-setting scenarios will be carefully considered as part of RPRA's review of our cost allocation methodology and fee models which is currently underway.

In 2027, RPRA staff will conduct a public consultation on any proposed changes to RPRA's cost allocation methodology and fee models, including possible multi-year fee setting scenarios.

Appendix C: Webinar questions and answers

Questions received during fee consultation webinars and RPRA's answers are organized by theme and listed in the tables that follow.

Cost allocation and budget

Question	RPRA's Response
Has there been cost analysis done on all common organizational expenses?	Yes. Every common cost line — shared salaries, IT services, software, facilities, professional fees — is reviewed each year by RPRA staff and the Board. RPRA is currently reviewing our cost allocation and fee-setting methodologies with an external consultant, including how common organizational expenses are assigned to programs. The objectives of the review include reducing fee fluctuations and improving simplicity and transparency. RPRA will be consulting on any changes arising from the review in 2027.
Does the 2027 budget also address how to bring free riders in the system into compliance?	Yes, compliance is a funded activity in the 2027 budget and business plan activities focused on RPRA's verification and audit framework include a dedicated free rider task force. RPRA also tracks and reports publicly on free rider compliance activity, by program.
Can you clarify some examples for indirect and shared expenses allocation?	Indirect and shared costs are costs that support all programs. They are allocated using the Board-approved cost allocation methodology. Examples include: Shared operating costs: the registry platform that all programs use, IT infrastructure, and office costs like rent and insurance. Corporate services: finance, HR, legal, and other executive functions that support the organization as a whole.
How many staff support each program?	RPRA uses a shared service model for front-line and back-office staff. Under this model, staff are typically not assigned to specific programs but support all programs across all three main delivery functions: registry service, compliance and enforcement, and public reporting. This shared services model supports efficiency, flexibility, and cost containment.

Proposed fees for the tires program

Question	RPRA's Response
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Could you please explain why only 50k was applied out of the total surplus? Shouldn't RPRA be using the additional funds right now when it is needed the most?	RPRA is applying the surplus to return fees to producers and to help minimize fee volatility year over year. Applying all of the remaining surplus to 2027 fees would mean a large swing in 2028, when the need may still be high. (Note that in response to stakeholder feedback, the applied surplus was increased after consultation from \$50K to \$75K for 2027.)
Has RPRA considered the optics of the fee proposal in light of the current situation with tire management in the province? Should you be considering holding off on using the surplus until you see the outcome of the changes to the tire regulation?	RPRA's decisions on fee rates and the return of surplus funds are made independently from any compliance and enforcement considerations.
So fees have gone up to cover costs on a system that is currently broken and not working....so what exactly are the extra funds going to do to actually help get rid of waste tires?	We are aware of issues within the system and are working closely with the ministry on ways to resolve those issues. The ministry recently closed a consultation on changes to the Tires Regulation that are focused on resolving some of the collection issues. There is currently no evidence that the slowdown in tires collection is related to producer non-compliance. The additional fees paid by tires producers will go towards additional investments in verification, ongoing compliance and enforcement work including monitoring for potential compliance issues, and operationalizing regulatory changes, among other things.

Proposed fees for the Blue Box and Hazardous and Special Products (HSP) programs

Question	RPRA's Response
When would the Away from home Deductions study be finalized and guidelines shared with Producers?	Later this year, RPRA will conduct a study to determine the final methodology for deductions. We will reach out to all registrants, Blue Box industry associations and interested parties by email to notify them of the opportunity to participate in the consultation to develop the deductions methodology.
Is the program budget increase due to professional services for the deductions study and the 2.9% for FTEs?	The recovery of expenses to fund investments in audit and verification capabilities deferred from 2026 to the 2027 Blue Box revenue requirement are resulting in a 2.9% increase in the proposed 2027 Blue Box fee (out of the total 12.5% increase proposed for consultation).
Will the producer responsibility program fees for blue box program (variable fee rate) will	RPRA fees are distinct from fees producers pay to PROs to meet their management requirements. RPRA program fees are used to fund the cost of building and operating RPRA's registries, providing service to

be same as Circular Materials fees?	registrants, and for undertaking compliance and enforcement activities.
Is the forecast for 2027 of 867 Million kg of supply data after supply deductions have been applied?	Yes, the Blue Box volume estimate for 2027 is after the application of supply deductions.
Could you explain why there is no increase proposed to the flat fee for small producers?	RPRA staff are proposing no increase to small producer fees for 2027. Small producer fees would remain at \$95 across all programs, consistent with 2026. Freezing small producer fees helps protect small producers from excessive burden and is consistent with RPRA's fee policy.
When will RPRA begin their final consultation on Blue Box Audit and Verification. This 2027 budget seems to allocate significant funds to audit and verification prior to the finalization of this guidance. given that industry has continuously provided RPRA with feedback that excessive audit and verification would be duplicative to existing processes undertaken by Producers and PROs, it seems premature to allocate such a large increase to these activities for 2027 prior to the consultation on these activities.	RPRA's current Blue Box audit and verification procedure includes guidance for producers on how to audit and verify supply data, as well as guidance for producers, processors and PROs on how to audit, verify and submit their performance reports. This work is ongoing in 2026. There are plans to revise or propose revisions and consult on that procedure in the future. There will be a need to resource these activities. This investment is not limited to just working on those procedures. There is a team in place tasked with auditing and verifying all reported data, focusing in the near term on the Blue Box program, and that is what is driving some of the direct costs associated with the Blue Box program allocation. This is part of our 2026 Business Plan.
What is the approximative proportion of small vs large producers?	It is a relatively stable split of 55% small producers to 45% large producers in the Blue Box program.
Does RPRA have an estimate of the return on investments for the blue box audit and verification?	The program is still being designed, and KPIs and outcomes have not yet been finalized. Overall, the program will achieve greater accuracy in supply reporting by reducing both over-reporting and under-reporting by producers, and by identifying unregistered producers. This will produce benefits for individual producers, improve the overall fairness of the program, and strengthen the accuracy of RPRA's public reporting.

Proposed fees for the Excess Soil Registry

Question	RPRA's Response
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What is driving the reduction in direct expenses? Is it anticipated number of registrants?	The Excess Soil direct expenses will decrease in 2027 because of lower interest costs on the program's debt, which was acquired to finance the Excess Soil Registry build and the program's operating deficit. The anticipated number of registrants in a program impacts its share of indirect costs it is allocated as part of RPRA's cost allocation methodology. The total estimated number of filings and estimated amount of cubic meters that RPRA anticipates being reported would impact the final fee rate. If the number of filings and soil volumes are estimated to go up, rates may come down, and vice versa.
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