



Defining large and small lighting producer categories for supply data verification

Consultation Report

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Executive Summary

This report details RPRA's consultation process, the feedback received and how RPRA incorporated the feedback into defining the cut-off thresholds that determine if lighting producers are considered large or small for supply data verification reporting.

The consultation period took place from April 23 to May 30, 2025. RPRA invited lighting producers to review and provide feedback on the proposed methodology for defining producer categories. Feedback received during the consultation period is summarized in the [What we heard](#) section.

RPRA updated its [Lighting Supply Data Verification Procedure](#) to include the finalized cut-off thresholds. The revised procedure was posted on August 15, 2025, and lighting producers were notified the same day.

Questions about this report can be emailed to consultations@rpri.ca.

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* (WTDA).

The RRCEA provides a producer responsibility regulatory framework for waste diversion and resource recovery where producers are individually accountable and financially responsible for their products and packaging once consumers dispose of them. The WTDA outlines the legislative framework for winding up and transitioning legacy waste diversion programs.

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

Background

Under the [Electrical and Electronic Equipment \(EEE\) Regulation](#), lighting producers are required to report supply data annually to establish their management requirements for the following year. Supply data must be reported in accordance with the Lighting Verification and Audit Procedure.

To support this, in 2023/2024, [RPRA consulted on the principles and methodologies](#) outlined in the Lighting Verification and Audit Procedure and developed the Lighting Supply Data Verification Procedure. In addition to determining that only large producers will be required to submit a verification report beginning in 2025, RPRA made the following decisions based on feedback received:

- All lighting producers were required to submit a one-time supply data verification report to RPRA in 2024 (the first verification reporting year)
- Consult on two categories of producers (i.e., large and small) after receiving 2024 verified supply data from lighting producers

Process

The consultation period ran between April 23 and May 30, 2025. RPRA created a dedicated [consultation webpage](#) with background information on the consultation, [the proposal](#) that outlined the proposed methodology to define the producer cut-off thresholds, and information on how to provide feedback.

Lighting producers received an initial email on April 23 notifying them of the consultation and a reminder email on May 21. Lighting industry associations were also notified/reminded of the consultation by email.

RPRA was seeking feedback on its proposed methodology that producers will use their last three years' average supply weight from the previous reporting period to define if they are a small or large producer. The following chart, which was included in the consultation proposal, outlines the proposed cut-off thresholds:

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

RPRA was seeking responses to two consultation questions in particular:

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

What we heard

RPRA received three written submissions during the feedback period, which is summarized by key themes below. Any feedback received that was unrelated to this consultation was not included in this report.

For the list of stakeholders that submitted written feedback, see [Appendix A](#). For RPRA's responses to feedback, see [Appendix B](#).

Method to define the producer cut-off thresholds

- All stakeholders were generally supportive of RPRA's proposed approach to have only large producers submit an annual verification report and define large producers based on a three-year average supply weight from the previous reporting period.
- According to one stakeholder, the percentage of aggregate supply weight appears to strike a reasonable balance between oversight and administrative efficiency. That stakeholder further advised that lowering the proposed threshold could introduce new compliance obligations and associated costs for producers with relatively limited environmental impact.

Alternative methods RPRA should consider

- One stakeholder suggested that RPRA develop an alternative, sampling-based process to select a subset of producers for verification each year.

Reducing administrative burden

- One stakeholder emphasized that:
 - Maintaining a straightforward methodology helps ensure that the process remains accessible and manageable, particularly for small producers.
- Future refinements to the verification process should be carefully evaluated to ensure they do not introduce additional complexity or cost for small producers.

RPRA received additional feedback within two of the submissions that fell outside the scope of this consultation. This feedback was shared with the appropriate team for consideration.

Conclusion

RPRA appreciates the thoughtful feedback provided throughout the consultation period. All submissions were considered when revising the [Lighting Supply Data Verification Procedure](#) with the finalized cut-off thresholds for large and small producers.

Based on broad support from stakeholders received during the consultation period, RPRA made the decision to use the methodology proposed in the consultation to determine the cut-off thresholds. Producers with an average supply weight of 90,000 kg or more of lighting in the previous calendar year will be required to submit a verification report each year.

The average weight of supply is calculated using the formula: $(Y3 + Y4 + Y5) / 3$

in which,

“Y3” is the weight of the producer’s ITT/AV or lighting, as the case may be, supplied in Ontario in the calendar year three years prior,

“Y4” is the weight of the producer’s ITT/AV or lighting, as the case may be, supplied in Ontario in the calendar year four years prior, and

“Y5” is the weight of the producer’s ITT/AV or lighting, as the case may be, supplied in Ontario in the calendar year five years prior.

Further, this methodology:

- Aligns with RPRA’s supply reporting verification procedures for other programs such as HSP
- Offers predictability for producers as it is based on their readily available supply data
- Reduces administrative burden by exempting approximately 90% of lighting producers from the verification requirement

The revised Lighting Supply Data Verification Procedure was posted to RPRA’s website on August 15, 2025, and lighting producers were notified the same day.

Producers will first use the revised procedure when submitting their supply data verification report in 2025. RPRA will contact impacted lighting producers to discuss the requirements for submitting their 2025 verification report and determine an appropriate deadline for submitting the report.

Appendix A: Stakeholders that submitted feedback

The three feedback submissions were received from the following stakeholders:

- Costco Wholesale Canada Ltd.
- Electro-Federation Canada
- IKEA Canada

Appendix B: Response to stakeholder feedback

RPRA considered all feedback received during the consultation period. Below are RPRA's responses to the feedback received. A summary of feedback received is found in the [What we heard](#) section of this report.

Method to define the producer cut-off thresholds

All stakeholders were generally supportive of RPRA's proposed approach to have only large producers submit an annual verification report and define large producers based on a three-year average supply weight from the previous reporting period.

According to one stakeholder, the percentage of aggregate supply weight appears to strike a reasonable balance between oversight and administrative efficiency. That stakeholder further advised that lowering the proposed threshold could introduce new compliance obligations and associated costs for producers with relatively limited environmental impact.

Alternative methods RPRA should consider

One stakeholder advised RPRA to conduct a sampling-based verification process for a subset of producers each year. RPRA chose to use thresholds based on a producer's average supply weight because it is a simple, uniform and predictable methodology that producers can use to plan for their reporting requirements well in advance of reporting deadlines.

Another stakeholder suggested that if RPRA considers voluntary options in the future, participation should remain optional and not influence future classification or obligations. RPRA is not considering making submission of verification reports voluntary.

Reducing administrative burden

One stakeholder stated that maintaining a straightforward methodology helps ensure that the process remains accessible and manageable. Any changes to future refinements should not introduce additional complexity or cost, particularly to small producers.

RPRA agrees with this feedback and will continue to take these considerations into account when making amendments to audit and verification processes in the future.

RPRA received additional feedback on topics outside of the scope of the consultation and will respond to the stakeholders directly.