



# **2023 RRCEA Fees for the Excess Soil Registry and Hazardous Waste Program Registry**

## **Consultation Report**

**December 1, 2022**

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## Executive Summary

The Resource Productivity and Recovery Authority (RPRA) is Ontario's regulator for the circular economy with a mission to implement the province's 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 hazardous or liquid waste.

RPRA's activities are focused on four strategic priorities:

- 1) Providing registrants with accessible and easy-to-use registry services
- 2) Delivering an effective compliance program to help achieve resource recovery and waste reduction outcomes for the province
- 3) Providing Ontario with reliable and useful resource recovery and waste information
- 4) Building an accountable, transparent and sustainable organization that achieves value for money

This report details RPRA's consultation process, the feedback received, and how RPRA incorporated the feedback into its decision-making on setting fees for users of the Hazardous Waste Program (HWP) and Excess Soil registries.

Questions about this report can be emailed to [consultations@rpra.ca](mailto:consultations@rpra.ca).

RPRA's fees for HWP and Excess Soil registries are charges that registry users pay to RPRA to cover its costs for building and operating the registries and providing service to users. RPRA's [General Fee-Setting Policy](#) guides how fees are set in accordance with a list of principles and objectives. HWP registrants will be required to use the new electronic HWP registry and pay fees to RPRA for the first time in 2023.

From September 26, 2022, to November 10, 2022, RPRA consulted on Excess Soil Registry fees. RPRA consulted on HWP registry fees from October 6, 2022, to November 21, 2022.

The subjects of both consultations included the fee models for each program, the inputs to each model (e.g., estimates of the number of producers or registrants, number of manifests, and the quantity of excess soil or hazardous waste), and the proposed fee rates.

The fee model for the Excess Soil Registry was approved as proposed during the consultation. The model consists of a fixed flat fee for small soil removal projects, and tiered fees tied to volume of soil removed or received for larger projects and soil reuse sites. The final fee rates are also unchanged from what was proposed.

The HWP Registry fee model and fee rates – consisting of a flat \$5 per-manifest fee and \$27.50 per-tonne fee for subject waste – was approved as proposed.

For more information on the final fees, review the 2023 fee schedules for each program:

- [2023 HWP Registry Fee Schedule](#)
- [2023 Excess Soil Registry Fee Schedule](#)

The 2023 fees for the Hazardous Waste and Excess Soil registries were approved on November 29, 2022. RPRA posted the final fees to its website on December 1, 2022, and stakeholders were notified the same day.

RPRA received two written submissions in response to the fee proposals – one each regarding the HWP registry fee proposal and the Excess Soil Program registry fee proposal. The comments are summarized in [What We Heard](#), and RPRA’s responses are detailed in the [Conclusion](#) of this report.

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

## Introduction

### About RPRA

RPRA is the regulator created by the Ontario government to enforce the requirements of the RRCEA and the [Waste Diversion Transition Act, 2016](#) (WDTA).

RPRA has also been directed by the Minister of the Environment, Conservation and Parks to build and operate registries for the Hazardous Waste and Excess Soil programs, governed by the [Environmental Protection Act](#) (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, including recovering resources and reducing waste. 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. The WDTA and RRCEA allow RPRA to set and collect fees to recover its costs from regulated parties. RPRA revenues come from two sources:

- Charges to industry funding organizations (IFOs) and industry stewardship organizations (ISOs) for RPRA’s oversight and wind-up of current waste diversion programs operating under the WDTA and the IFOs that operate those programs.
- Charges to parties required to register and report to RPRA.

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 must engage in public consultation 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.

***Accessibility and cost effectiveness:*** 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.

**Transparency:** 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 RPRA's proposed 2023 fees for the Excess Soil and HWP registries were consulted on during October and November. A [dedicated web page](#) was created on RPRA's website with background information on the consultation, registration links for the webinars, and presentation materials.

On September 26, 2022, RPRA emailed its general mailing list (approximately 1,900 subscribers) announcing the start of the consultation for fees for the Excess Soil Registry, and providing information on how to participate. On September 27, RPRA notified registry users and other stakeholders. On October 6, RPRA emailed its HWP mailing list to announce the start of the consultation for 2023 HWP Registry fees. All stakeholders were invited to submit feedback on the proposed fees via email or by attending one of several program webinars hosted in October.

### What we heard

RPRA received feedback through several channels:

- Webinars:
  - For proposed fees for the HWP Registry: October 12 and 14, 2022 - 352 attendees
  - For proposed fees for the Excess Soil Registry: October 20, 2022 - 70 attendees
- Webinar presentations and recordings can be found on the [consultation webpage](#).
- Two written submissions from the Canadian Vehicle Manufacturing Association (CVMA) were received by email – one each regarding HWP Registry fees and Excess Soil Registry fees.

Questions and comments submitted during the webinars and RPRA's answers are recorded in [Appendix A](#).

The feedback received from the two emailed submissions is summarized below:

- For HWP Registry fees, a stakeholder emphasized the importance of striving to set HWP fee rates for multiple years to increase certainty for businesses. Suggestions were also made about how invoices, invoice information, and fee payments would be handled in the new registry.
- For Excess Soil Registry fees, a stakeholder requested that RPRA ensure that there is no cross-subsidization of fees across RPRA's programs. The stakeholder also noted the importance of cost transparency, oversight and controls for minimizing the financial burden to fee-paying registry users; and requested that RPRA expand the application of flat fees to soil removal projects involving less than 100,000 m<sup>3</sup> of excess soil.

RPRA's responses to feedback provided during the consultation are detailed in the [Conclusion](#) section of this report.

For a list of all questions received during the webinars presented in October, and RPRA's answers, see [Appendix A](#).

## Evaluation

To help RPRA improve future consultations and communications, participants were invited to complete a short survey following the consultation webinars. Of the 380 webinar attendees, 171, or 45%, completed the survey.

In response to the question, “Overall, how would you rate the consultation?”, 93% of respondents ranked the session “Excellent”, “Good” or “Average” (based on a scale of Excellent, Good, Average, Fair, Poor).

57% of respondents said the information provided by the presenter was “Extremely or Very helpful”, and 40% said it was “Somewhat helpful”. 3% said it was “Not so helpful”, and 0 respondents said it was “Not at all helpful”.

Majority of respondents (94%) ranked the presentation slides of the webinars as “Excellent”, “Good” or “Average”. 95% of respondents ranked the question and answer portion as “Excellent”, “Good” or “Average.”

Note: This section was amended to report the numbers for the HWP and Excess Soil webinars only.

## Conclusion

The 2023 fees for the HWP and Excess Soil registries were approved on November 29, 2022. RPRA posted the final fees to its website on December 1, 2022, and stakeholders were notified the same day.

RPRA appreciates the feedback provided through the consultation process, and considered all comments in setting the fees.

RPRA considered the comments made regarding fee predictability, transparency of program budgets, cross-subsidization, and invoicing and pre-payment.

HWP and Excess Soil fees are being set for one year. They will be reviewed again in fall 2023. RPRA's fee rates are dependent on RPRA's overall budget and the annual cost to operate the HWP and Excess Soil Registries, as well as the estimated number of transactions and volume of soil or waste RPRA expects to be reported in the registries. These inputs can vary annually, and are especially subject to variation when the registry is new. Once RPRA's registry operations stabilize, we expect to be able to provide more fee stability year over year, and to be able to set fee rates for more than one year.

RPRA is also committed to transparency around its budget and fee-setting process. This year, RPRA provided more budget detail at its webinar presentations than it has in the past, and RPRA's 2023 Business Plan provided more detail about the 2023 budget than in previous years. RPRA is committed to providing more program-level budget detail at the beginning of the 2024 fee consultation.

As explained in the consultation materials, RPRA uses a shared services model to deliver its programs efficiently. A cost allocation methodology is used to allocate RPRA's costs to the different programs. Each program is allocated its own direct costs, including its registry build costs. Shared costs that vary based on program size, including staff salaries and benefits and IT services, are allocated using key cost drivers. One of these cost drivers is the number of registrants in a program. This is why, for example, the HWP registry is allocated more of the shared services budget and has a higher total cost recovery target than Excess Soil.

The HWP Registry system has been set up to enable RPRA to issue invoices monthly to generator accounts. RPRA will issue each generator account one monthly invoice, which will provide manifest and tonnage fees by waste generation facility. Larger companies may choose to register one account and add multiple users based on each facility, or register separate accounts for different facilities. RPRA is also enabling a process for generators to download detailed invoice information from the registry for each facility. Pre-payment is not possible within the HWP Registry system at this time. The suggestions about the registry system relating to invoicing and payment will be considered as part of future registry enhancement work.

RPRA also considered the request to assign flat fees to Project Area Notices for the removal of volumes of soil greater than 10,000 m<sup>3</sup>.

2023 will be the first full year that the Excess Soil Registry will be required to be used to record the generation, storage, beneficial reuse, and movement of excess soil. Adjustments to the Excess Soil Registry fee model and rates will be considered in future years as RPRA gathers data about fee rate inputs, including the number and type of notices filed annually, and the quantities of soil moved. Future fee models and rates will also depend on whether the

amendments to the [On-site and Excess Soil Management Regulation](#) proposed in fall 2022 are approved.

# Appendix A: Questions and answers

Below are the questions received during the consultation webinars and RPRA’s responses. Questions have been organized by the topic, and questions not relevant to this consultation have been excluded. Some questions were edited for length and clarity, and similar questions were grouped together.

- [Proposed fees for the Excess Soil Registry](#)
- [Proposed fees for the Hazardous Waste Program Registry](#)
  - [Fee- and payment-related](#)
  - [Registry transition, registration, manifesting and other operational queries](#)

## Proposed fees for the Excess Soil Registry

Question	Response
<b>Have you heard from the MECP on whether the regulatory requirements to register and report on the RPRA registry will actually come into effect on Jan 1? Or if they are planning on delaying or making changes to the Reg?</b>	As stated in the Excess Soil Regulation, requirements to file notices on the Excess Soil Registry will come into effect on January 1, 2023.
<b>Could you please explain the variable fee? Would 15,000m3 be charged \$0.025/m3?</b>	Correct. The proposed fee model assesses project area notices for projects generating between 10,000 and up to 50,000 m3 of excess soil a fee of \$0.025 per m3.
<b>You mentioned there could be additional fees applied at project close-out, in the event the volume moved is greater than the initial estimates. If the volume is less, would there be a rebate and/or credit?</b>	Yes. A refund would be issued for fees assessed on m3 of excess soil that were not ultimately generated as predicted when the project area notice was filed.
<b>What’s the relationship between RPRA and MECP? Is RPRA a non-profit or Crown corporation acting on the MECP’s behalf? Are any of the fees returned to the MECP?</b>	RPRA is a delegated administrative authority created by provincial legislation and mandated by the provincial government to build and operate registries and compliance programs for regulated entities under the RRCEA, and to build and operate the Excess Soil and Hazardous Waste Program registries. RPRA is a non-profit and operates on a cost-recovery basis. All of its revenue comes from fees to registrants, which are charged in order to support RPRA’s operations. We receive no funding from government, and we currently do not collect any fees on behalf of MECP.
<b>What kind of fee escalation can we expect for budgeting multi-year projects?</b>	RPRA sets fees annually according to our forecast costs to operate our programs effectively. 2023 will be the first full operational year for the Excess Soil Registry, and there is uncertainty about how many registrants are likely to use the registry and what amount of soil is likely to be reported. Accordingly, annual variation in fee rates is likely in the near term. Over the longer term, as we collect annual data and establish baseline requirements, RPRA aims to provide more stability and predictability in fees. Our 2023 Business Plan includes RPRA’s budget forecasts for 2024 and 2025.

<p><b>Are projects that started in 2021 or 2022, required to submit notices in 2023, or will they be "grandfathered" since they pre-date the regulation's start date?</b></p>	<p>According to the <a href="#">Excess Soil Regulation</a>, notices do not need to be filed for projects for which contracts were entered into before January 1, 2022. For projects begun in 2022 that are still moving soil as of January 1, 2023, project owners are required to file notices on the Excess Soil Registry (unless a notice was filed voluntarily in 2022).</p>
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## Proposed fees for the Hazardous Waste Program Registry

### Fee- and payment- related

Question	Response
<p><b>If the 2023 fees are based on a 2023 budget which has already been submitted to the government for approval, how much input do users get during this consultation (since it seems the fees are already set)?</b></p>	<p>RPRA's <a href="#">2023 Business Plan</a> outlines RPRA's planned activities and budget for 2023. It does not require government approval. RPRA submits the plan prior to publishing to the Minister annually to ensure transparency. RPRA is consulting on proposed 2023 fees prior to finalizing them for all programs. Our final fees are dependent on the estimated number of fee payors per program, estimated amount of material supplied/reported, and our cost allocation to each program. Feedback from our stakeholders informs these estimates. It also is considered in our fee models and program allocations.</p>
<p><b>Will fees always be announced 8-10 weeks before the end of the calendar year? Or will generators be provided with more advance notice in the future?</b></p>	<p>RPRA's annual Business Plan is published in October each year. Program fees for the upcoming year are connected to the content in the annual Business Plan, including RPRA's budget and planned major activities. For this reason, consultation on the upcoming year's program fees will correspond with or closely follow the annual publishing of the plan. However, once operations for new programs are stabilized, we hope to be able to provide fee stability year over year, and/or set fee rates for more than one year.</p>
<p><b>Has a cost/benefit analysis been conducted?</b></p>	<p>The MECP made the decision to transfer hazardous waste reporting to an electronic registry system from the current HWIN system in 2020. Information on that decision can be found on the <a href="#">Environmental Registry</a>.</p>
<p><b>The 2023 RPRA cost recovery for EPA programs increased by 194% over 2022 – can you explain why?</b></p> <p><b>How can industry provide informed comments on the proposed fees prior to the publication of the 2023 Business Plan or 2023 Budget?</b></p>	<p>The nearly 200% increase in the cost recovery target for EPA programs from 2022 to 2023 reflects that 2023 will be the first full year that the Excess Soil and HWP registries will be operational, and the first full year that both programs will be fully up and running.</p> <p>The <a href="#">2023 Business Plan</a>, which includes an outline of the 2023 budget, was published on October 18. HWP fees are derived from a program budget that reflects the HWP Program's share of the overall RPRA budget for 2023. The 2023 HWP Program budget is not expected to change.</p>
<p><b>Will the manifest and tonnage fees remain unchanged in the coming years?</b></p>	<p>RPRA currently sets fees annually. Because the HWP Registry is new, the level of resources required to operate the system and provide support to stakeholders who report under the Hazardous Waste Program is not certain over more than one year's time. Once RPRA gains experience in operating the registry, we hope to be able to provide fee stability year over year, and/or set fee rates for more than one year.</p>
<p><b>When will the fee for the next year be determined? How much notice</b></p>	<p>Proposed HWP Registry fees, including manifest and tonnage rates, will be consulted on annually in advance of the calendar year to which they apply, generally in October to correspond</p>

<p><b>will generators receive about future increases?</b></p>	<p>with the publishing of RPRA’s annual business plan. Proposed fee rates are dependent on RPRA’s overall budget and the annual cost to operate the HWP Registry, as well as the estimated number of manifests RPRA expects to receive and the tonnes of hazardous waste RPRA expects to be reported. These inputs can vary annually, but RPRA will try to smooth the impacts of these fluctuations on fee payors, while ensuring it recovers the costs of operating the registry to the standard required and expected by users. Once the operations for new programs are stabilized, we hope to be able to provide fee stability year over year, and/or set fee rates for more than one year.</p>
<p><b>Can you provide an idea or approximation of the potential percent increase in the fees in 2023 vs. 2022?</b></p>	<p>Compared to the current HWIN program, RPRA is proposing to retain a \$5 per manifest fee, and reduce the tonnage rate for applicable subject waste from \$30 per tonne to \$27.50. There will also be no registration fee for users of the new HWP Registry operated by RPRA. Final fees will be posted by December 1, 2022.</p>
<p><b>Does the \$27.50 tonnage fee apply to anything on a manifest including subject wastes, or is this cost specific to Hazardous Wastes only?</b></p>	<p>The proposed \$27.50 tonnage fee will apply to applicable subject waste as per <a href="#">Ontario Regulation 323/22: Subject Waste Program</a>, excluding waste exempt from a tonnage fee as specified in the regulation. This is consistent with how tonnage fees were applied within the current program.</p>
<p><b>Will there ever be a true-up cost recovery during the year?</b></p>	<p>RPRA determines year-end budget balances at the end of each calendar year. Any surplus or deficit in program budgets will be reflected in the determination of the total cost recovery target for future years. For example, if there is a surplus in the HWP budget at the end of 2023, that surplus will be deducted from the cost recovery target for the HWP Registry Program for 2025.</p>
<p><b>How do you know if your waste is subject to fees; is there an inventory or is it that once you're a generator your waste is subject?</b></p>	<p>Once your facilities and waste streams are recorded in the HWP Registry, the registry will make clear to you what waste is subject to manifest and/or tonnage fees. The application of manifest and/or tonnage fees is determined by <a href="#">Ontario Regulation 323/22: Subject Waste Program</a>. This is consistent with how fees were applied within the current program.</p>
<p><b>Is there a policy for a maximum fee rate increase to avoid a price shock?</b></p>	<p>RPRA recovers costs and sets fee rates according to its General Fee Setting Policy, which includes the principle of simplicity and predictability. To the extent possible, RPRA will strive to prevent extreme fee rate changes.</p>
<p><b>What are the proposed payment terms for the monthly invoicing? Historically we paid all fees annually in lump sum at registration renewal – will this still be possible?</b></p> <p><b>What are the payment options going to be for the new registry?</b></p> <p><b>It was mentioned that monthly payments will be expected. Will there be penalties for not paying monthly if there is difficulty with the payment options available?</b></p>	<p>Generators will be invoiced monthly for subject waste received and recorded on completed manifests. Fees for all manifests and subject waste received within the previous month will be included on the monthly invoice. Fees for onsite disposal will be invoiced at the time the disposal activity report is completed.</p> <p>Payments can be made by credit card, cheque, electronic bill payment (which is done by making RPRA a payee for the bank account from which payments will be made), or by electronic payment through generator’s bank. For more information on these payment methods, see the <a href="#">HWP FAQ</a> on our website.</p> <p>RPRA may also charge a late payment fee. You can <a href="#">contact</a> our registry support team if you require assistance navigating RPRA’s payment options and ensuring payment is made.</p>

<p><b>If an organization has multiple company accounts, does each company account need to pay a registration fee?</b></p>	<p>RPRA is not proposing an annual registration fee. RPRA is proposing a per manifest fee and a per tonne fee for applicable subject waste.</p> <p>Fees will be invoiced monthly to each generator account.</p>
<p><b>What will happen to my account balance on HWIN?</b></p>	<p>RPRA migrated <a href="#">some HWIN user data</a>, such as waste stream details, to the new HWP Registry. However, financial information and funds will not be migrated. HWIN users should take steps before 2023 to address remaining funds in their HWIN accounts. See the <a href="#">HWP FAQ</a> for more information.</p>
<p><b>Now that manifests will be created online, will we still need to pay \$5 per manifest created? What is this fee covering?</b></p>	<p>Yes, RPRA is proposing to charge a \$5 per manifest fee. Manifest fees and tonnage fees will be collected to recover RPRA's costs to develop and operate the HWP Registry.</p>
<p><b>Can generator account fees be delegated to the contractor in the event a partial delegation agreement is in place? Or would the fees be applied to the generator's account only?</b></p>	<p>Fees are charged to the business that sets up the generator account in the HWP Registry. All invoices will be sent to the business that registered the generator account. Service providers can be given full delegation to handle all registration, reporting and payment on the HWP Registry. If partial delegation is used, the generator account and not the service provider will be invoiced directly.</p>
<p><b>Will a tonnage fee be applied to leachate loads?</b></p>	<p>RPRA is required by regulation to maintain existing fee exemptions. See the <a href="#">Subject Waste Regulation</a> under the RRCEA.</p>
<p><b>Municipalities running MSHW events have not historically had HWIN fees. Will this continue to be the case with the RPRA registry?</b></p> <p><b>Municipalities running HHW events have not historically had HWIN fees. Will this continue to be the case with the RPRA registry?</b></p>	<p>Fee exemptions for wastes and sources of waste that currently exist under the Hazardous Waste Program remain in the HWP Registry in 2023. This includes waste collected at Municipal Hazardous and Special Waste events.</p>
<p><b>Will a tonnage fee be applied to leachate loads?</b></p>	<p>RPRA is required by <a href="#">Ontario Regulation 323/22: Subject Waste Program</a> to maintain the fee exemptions established under <a href="#">Ontario Regulation 347: General – Waste Management</a>.</p>
<p><b>Will ECA permitted facilities have to pay the tonnage fee?</b></p>	<p>RPRA is required by <a href="#">Ontario Regulation 323/22: Subject Waste Program</a> to maintain the fee exemptions established under <a href="#">Ontario Regulation 347: General – Waste Management</a>. If a facility that holds an ECA is currently exempted from tonnage fees under the current system, it will remain exempted from tonnage fees for the HWP Registry Program in 2023.</p>
<p><b>Will the invoice identify the site that the manifest or tonnage fee is for?</b></p>	<p>RPRA will issue each generator account one monthly invoice, which will provide manifest and tonnage fees by waste generation facility. See our <a href="#">HWP FAQ</a> for more information.</p>
<p><b>Who pays the \$5 manifest fee?</b></p>	<p>All RPRA fees will be paid by the generator. If full delegation is selected, the authorized delegate that registers the generator's facility will pay the fees.</p>
<p><b>Can a manifest have more than one HW [waste stream]?</b></p>	<p>Yes. Unlike with paper manifests that limit the number of waste streams that can be included on a single manifest, on the electronic manifest filled out through the HWP Registry there is</p>

	no limit to the number of waste streams that can be included. See our <a href="#">HWP FAQ</a> for more information.
<b>Can separate invoices be produced for multiple facilities within an organization?</b>	At this time, the HWP Registry is unable to issue separate invoices for different facilities managed under one account.  RPRA will issue each generator account one monthly invoice, which will provide manifest and tonnage fees by waste generation facility.  Larger companies may choose to register one account and add multiple users (with their own login and contact info) based on each facility, or register separate accounts for different facilities.
<b>The payment FAQ explains that a cheque or "electronic bill payment" is accepted. The invoice will be issued monthly. How would a Purchase Order be issued?</b>	RPRA is not a vendor – we are mandated by law to build and operate the HWP Registry, and collect fees, and registrants are mandated to use the registry to report their waste.  There is no mechanism within the registry system by which RPRA can receive purchase orders.
<b>Do I need to set up RPRA as a "vendor" in order for invoices to be paid?</b>	Payments can be made by credit card, cheque, electronic bill payment (which is done by making RPRA a payee for the bank account from which payments will be made), or by electronic payment through generator's bank. For more information on these payment methods, see the <a href="#">HWP FAQ</a> on our website.
<b>Will RPRA have account representatives to deal directly with generators (i.e., if not using delegates) for things like account set up, etc., since RPRA will become a new vendor for these companies?</b>	Support is available for all users – please visit our website for extensive <a href="#">information and training materials</a> . You can also <a href="#">contact</a> our Registry Support Team if you require additional assistance.
<b>When is payment due after an invoice is issued?</b>	Invoices are due upon receipt unless otherwise indicated.  RPRA will issue each generator account one monthly invoice, which will provide itemized manifest and tonnage fees by waste generation facility.

**Registry transition, registration, manifesting and other operational queries**

Question	Response
<b>How will this affect cross-border shipments? Will American counterparts be able to access the e-manifests?</b>	American entities can access the manifest on the HWP registry. Once the company's account has been created and enrolled in the HWP program, companies will be able to retrieve existing generator account data from HWIN (as associated facility and waste information) and have it copied over to the HWP Registry. <a href="#">Review these instructions</a> for more on the process.  Visit our <a href="#">HWP Registry Resources</a> webpages for instructions and training videos. For additional support, please contact the <a href="#">Registry Support Team</a> .
<b>Will there be public reporting transparency on the manifests/waste shipments?</b>	Information that is publicly available from the HWIN system (certain generator and waste stream information) will remain publicly available through the HWP Registry via <a href="#">this link</a> .
<b>We have customers in another province who need to send a</b>	The HWP Registry will enable you to print copies of manifests.

<b>copy of the manifest to their provincial regulatory authority. How will they be able to do this in the future?</b>	
<b>Do we still have to send a copy of the manifest to the ministry after the shipment is picked up?</b>	No. There is no longer any need to send a paper copy of a manifest to the ministry.
<b>How will discrepancies be corrected with new electronic system?</b>	Manifest values can be changed in the registry at any time during the manifest creation process; the registry system ensures changes are correctly authorized before a manifest is considered complete.
<b>What do we do in an emergency situation if we have to call SAC in the middle of the night for a spill, do we do a manifest the next business day? Because generally there is no one to complete the manifest at that time.</b>	How you initially report emergency spills will not change with the HWP Registry. You will receive an emergency generator number and can enter that into the HWP Registry at the earliest opportunity.
<b>Does everything get automatically transferred? Is there anything we need to do to migrate the information to RPRA?</b>	Once the company's account has been created and enrolled in the HWP program, you will be able to retrieve existing generator account data from HWIN (as associated facility and waste information) and have it migrated into your new HWP Registry account. <a href="#">Review these instructions</a> for more information on the process.
<b>Our service provider has informed us that they will not be offering full service delegation. How can we get a list of providers who are willing to be an authorized generator delegate?  Where can I find a list of service delegates?</b>	RPRA does not provide a list of service providers offering delegation services. It is likely that many carrier and receiver businesses providing services to generators today will act as AGDs, in a full or partial delegation role. Generators and service providers are encouraged to talk to each other about delegation and determine if they would like to take part in delegation and if so, decide on full or partial delegation.
<b>Are multiple delegations allowed from the owner to two or more service providers?</b>	Yes – generator companies can authorize delegation to multiple service providers.
<b>How does the registry system handle emergency situations where waste needs to be transported but the generator has not previously created an account on the registry?</b>	When you call the Spills Action Centre, they will provide you an emergency generator registration (or EGR) number. With the EGR number, you will be able to register a facility as an EGR facility in the HWP Registry. If you do not have an existing registry account, you will need to create one in order to report the emergency spill in the HWP Registry.
<b>What if a driver does not have cell service during transport and gets pulled over? What do they provide?</b>	The mobile application for the HWP registry supports offline reporting. If the app user stays logged in, they will be able to use the app even if they enter an area where they are not able to access internet service. It is advised that drivers/users stay logged into the app or log in before exiting areas with internet service to ensure they can use the app in offline mode. Users can stay logged into the mobile app for up to 72 hours.  Information that is reported through the mobile app while offline will be replicated in the desktop application (once the user has internet connection again) because of the live synchronization

	between the two platforms. For more information on this, please view our <a href="#">demonstration video</a> .
<b>Is there a template for written delegations available?</b>	RPRA does not have a template for delegation agreements. Requirements for written authorizations to delegate are set out in the ministry’s proposed updated “Registration Guidance Manual for Generators of Liquid Industrial and Hazardous Waste.” The ministry consulted on the proposed updates until November 12, 2022.
<b>Has RPRA consulted with the MTO about their transport requirements when it comes to waste in-transit?</b>	RPRA has been in contact with Transport Canada to align the manifesting process on the HWP Registry with most of the requirements in the <a href="#">Transportation of Dangerous Good Regulations</a> (TDG). For example, HWP Registry users will be able to access, download and print a PDF version of their manifest that complies the federal requirements in most cases. If you have specific questions about TDG requirements and the HWP Registry, please <a href="#">contact</a> our Registry Support Team.
<b>Will RPRA or Transport Canada be publishing a Q&amp;A or other document to indicate the level of alignment or ability to use 1 manifest for both purposes?</b>	See above for information about the alignment between Transport Canada requirements and printable manifests generated by the HWP Registry.
<b>Are Generator IDs going to be the same or will they change?</b>  <b>In our HWIN account, we have different users registered under the same account. Will these users be transferred to the new account, or will we need to register them again? Will there be option to add new users or disable the existing ones?</b>	<p>If users of the new registry have chosen to retrieve their HWIN data (that was migrated over to the new registry) their HWIN generator number will remain the same.</p> <p>All users who have an active waste stream associated with an active facility and have not delegated account creation to an Authorized Generator Delegate are required to create an account in the HWP Registry. Account creation consists of entering your company name and contact information, adding users (user registered under the HWIN account will not be automatically transferred to the HWP Registry account) and creating usernames and passwords. Once you create an account in the new registry, you will be able to migrate all of your existing generator numbers from HWIN (and associated facility and waste information) to your one company account.</p> <p>If you are a generator who is fully delegating to an Authorized Generator Delegate (AGD), you will not have to create a Registry account. In that case, the AGD will manage your facility and waste information under their own Registry account.</p>
<b>Does the full delegate need to provide access to the new database so that we have copies of the manifests?</b>  <b>If duties are fully delegated, how does a generator get documentation to show due diligence?</b>	Your fully delegated service provider (Authorized Generator Delegate or AGD) can download manifest information from the registry and provide it to you. The ministry will have full access to manifest information through the registry.
<b>Will there be a public facing-portion of the HWP Registry?</b>	Information that is publicly available from the HWIN system (certain generator and waste stream information) will remain publicly available through the HWP Registry via <a href="#">this link</a> .

<p><b>Where is the server located for the registry? Will the information/data be stored within Canada, or will it be stored internationally?</b></p>	<p>Yes. The HWP Registry is built on a cloud-based database service, whose data centre is located in Canada. Our service provider also has emergency back-up data storage centres in other countries.</p>
<p><b>Will account owners (e.g., a municipality) be sent a copy of the manifest (with signature) to allow payment processing?</b></p>	<p>The registry is not currently configured to release notifications of account activities to account owners. However, account owners can go into the HWP Registry at any time and see all activities and manifests related to their account, and to print manifests if necessary.</p>
<p><b>We are a hauler for a generator; will we need to also set up an account with RPRA or will this be done by the generator through their account?</b></p>	<p>Yes. Carriers and receivers are required to create an account in the HWP Registry and link their active Environmental Compliance Approval numbers to their Registry accounts.</p> <p>Only carriers and receivers who have HWP Registry accounts will be able to be listed on manifests.</p> <p>As of November 15, 2022, the HWP Registry is open for users to set up their accounts, so they can prepare to meet their reporting requirements and start manifesting on January 1, 2023.</p> <p>Please visit our website for <a href="#">resources</a> for generators, carriers and receivers, including instructions on how to set up registry accounts.</p>
<p><b>Can any entity (e.g., generator, carrier, receiver) start a manifest?</b></p>	<p>Generators, carriers and receivers can all initiate manifests as long as they have accounts in the Registry.</p> <p>Please visit our website for <a href="#">resources</a> for generators, carriers and receivers, including instructions on how to initiate manifests.</p>
<p><b>Will service providers have the capability to pre-fill the electronic forms as they do now for the hard copy forms?</b></p>	<p>Yes. The new HWP Registry has been built to allow draft manifests to be easily created in the new system. Facility and waste stream information can be automatically applied to the manifest through easy lookups and tables, using a web browser or the mobile app. Additionally, manifests can be 'copied' for reuse when the same or similar shipments happen more than once.</p> <p>Please visit our website for <a href="#">resources</a> for generators, carriers and receivers.</p>
<p><b>If I need to register for a generator number before the October migration date on the HWIN site, will I be charged \$50? Or should I wait until there are no fees in the new year to register for a generator number?</b></p>	<p>The HWIN registration fee remains applicable to 2022. If you have 2022 activities to report on, you will need to have an HWIN account now in order to complete your reporting.</p> <p>Beginning on January 1, 2023, hazardous waste activities will be reported through the new HWP Registry.</p>
<p><b>Has RPRA considered a transition time (i.e., an additional year) to avoid major adverse business disruption?</b></p>	<p>RPRA is required to develop and launch the HWP Registry digital reporting service as per the terms of the Minister's Direction, which was amended in April 2021 to extend the original launch date from January 1, 2022, to January 1, 2023. More information about the contents of the direction and the launch can be found on RPRA's <a href="#">website</a>.</p>

<p><b>If RPRA’s front line staff are being used for many programs, what will be the determining factor to get 'all hands on deck' if there is a problem.</b></p>	<p>RPRA employs a risk-based framework to deploy staff. RPRA understands the need for nimbleness in order to quickly resolve issues when they have the potential to impact hazardous waste transfers.</p>
<p><b>Will the manifest/tonnage fees invoice to the individual generating fees, or one invoice per main account (in a case where a company has multiple sites)?</b></p> <p><b>For companies with multiple branches, are all fees from all locations able to roll up to one bill or do users have to pay each individual site separately?</b></p>	<p>At this time, the HWP Registry is unable to issue separate invoices for different facilities managed under one account. Monthly invoices will include the applicable fees for manifests completed during the previous month and will break fees down by facility. If a user is looking for more details about facility-specific activities, they can find that information in the registry. Users will also be able to download detailed information about manifest invoices on a facility-by-facility basis.</p>
<p><b>On this online e-manifest, will generators still be restricted to send only four items per manifest? This was a restriction on the hard copies before because of the lack of physical space.</b></p>	<p>Electronic manifests completed through the HWP Registry will not restrict users to a maximum number of items per manifest.</p>
<p><b>If we engage an Authorized Generator Delegate (AGD), would TDGA training still be a mandatory requirement for team-members at the stores generating wastes?</b></p>	<p>This question needs to be posed to your AGD, or staff in the federal government involved with the TDG program.</p>
<p><b>Does the HWP Registry eliminate the need to send the manifest by mail to the Ministry of the Environment, Conservation and Parks?</b></p>	<p>As of January 1, 2023, all manifests must be completed and submitted through the new HWP Registry, and are not required to be mailed to MECP.</p>
<p><b>Will there be training on inputting into the online registry system?</b></p>	<p>Yes. RPRA has developed a library of resources to support HWP Registry users with navigating the online system and completing common activities, such as account creation, delegation, adding waste streams and manifesting. You can find all training materials and other resources, such as FAQs and past webinar recordings, on our <a href="#">website</a>.</p>
<p><b>How long will we have to keep paper manifests from 2022?</b></p>	<p><a href="#">Regulation 347: General – Waste Management</a> requires the regulated community to maintain a copy of paper manifests for a period of two years, for manifests that are applicable prior to January 1, 2023.</p>
<p><b>I am in Nova Scotia; we use waste removal service providers twice per year. This waste may ultimately end up in Ontario. Will the waste removal company deal with all this and transfer fees?</b></p>	<p>Like the current program, all registry fees will be paid by the generator.</p> <p>If full delegation is selected, the authorized generator delegate (AGD) that registers the generator’s facility will pay the fees.</p> <p>If a generator has partially delegated to a service provider, the AGD can manage and report activities at the generators’ facilities, but the generator will be responsible for paying the fees.</p>

	Ultimately, whether the waste removal company registers and pays fees to RPRA on your behalf is up to your agreement with them.
<b>Is there a cancellation process for a generator number in the new website if waste is no longer generated, or if there's a change of ownership in a business that has existing generator numbers?</b>	Yes. There is a process for deactivating waste streams and generating sites within the online registry. Check out our <a href="#">training materials</a> for details on how to deactivate facilities or waste streams.
<b>If we have extra blank manifests, can we still use them in 2023?</b>	Blank paper manifests are not usable after 2022.
<b>After data is transferred to RPRA, will we still have access to our HWIN account?</b>	The HWIN system is being decommissioned at some point in 2023, and user access will not be possible. All reporting must happen through the HWP Registry starting in January 2023. MECP will be sending information about how long HWIN user accounts will be accessible.
<b>If we cannot find our username/password for HWIN and the email used is no longer available, how do we gain access to the HWP Registry? Do I start a new account with new Generator ID?</b>	It will be possible to set up a new generator account in the HWP Registry, but no information would be migrated from a current account in the HWIN system. Reach out to MECP or <a href="#">RPRA Registry Support</a> for help.
<b>We have customers in another province where they need to send a copy of the manifest to their provincial regulatory authority. How will they be able to do this in the future?</b>	The new registry will enable users to print copies of manifests, but they will not be required to be sent to MECP.
<b>How will we know when waste has been picked up when we no longer will receive a copy of the original paper manifest?</b>	The registry keeps track of the status of the manifesting process, and users can log in to view that status.
<b>Do we have to re-register our waste (Parts 2b form)?</b>	See <a href="#">our FAQ</a> to understand what information has been migrated from the HWIN system to the HWP Registry.
<b>What is the process to set up a new generator # next year, and to cancel generator #?</b>	Generator numbers and all information associated with a generator currently registered with HWIN has been migrated to the new HWP Registry. Once the company's account has been created and enrolled in the HWP program, companies will be able to retrieve existing generator account data from HWIN (as associated facility and waste information) and have it copied over to the HWP Registry. <a href="#">Review these instructions</a> for more on the process.  There is also a process for deactivating waste streams and generating sites within the new HWP registry. Check out our <a href="#">training materials</a> for more information.
<b>If a generator business has a fully delegated AGD, what are the generator businesses' obligations?</b>	The rules in Regulation 347 related to who is responsible for reporting information about hazardous waste activities are not changing. Although generators can delegate service providers to submit all information on their behalf, the amended regulation makes clear that the generator remains ultimately responsible for meeting their reporting requirements.