

March 31, 2021

Ms. Gemma Zecchini
Executive Director, Stewardship Ontario
1 St. Clair Ave. West, 7th Floor
Toronto, ON M4V 1K6

Dear Ms. Zecchini,

RE: Approval of Stewardship Ontario's Plan to Further Mitigate Conflict of Interest and Undue Commercial Advantage arising out of Stewardship Ontario's Continuing Relationship with CSSA

I am writing to advise you and the Board of Stewardship Ontario (SO) that the Resource Productivity and Recovery Authority (the Authority) has approved SO's proposed Plan to Further Mitigate Conflict of Interest and Undue Commercial Advantage arising out of Stewardship Ontario's Continuing Relationship with the Canadian Stewardship Services Alliance (CSSA).

On December 16, 2020, the Authority's Board approved SO's Blue Box Program Wind-Up Plan with six conditions. The second condition read:

"Stewardship Ontario shall ensure that the Code of Conduct applies to all Stewardship Ontario staff, and that a plan be developed to the satisfaction of Authority staff showing how CSSA staff that work on Stewardship Ontario files will not provide services to any programs where conflict of interest concerns are present, and showing how CSSA will not use any Stewardship Ontario program data – including steward-specific information – in any programs where conflict of interest concerns are present. The plan would be submitted to the Authority by February 15, 2021."

On February 11, 2021, SO submitted the Plan to Further Mitigate Conflict of Interest and Undue Commercial Advantage arising out of Stewardship Ontario's Continuing Relationship with CSSA. The plan outlines three major additional measures:

1. Two new SO policies relating to:
 - a. segregation of select CSSA staff
 - b. prohibitions on solicitation of SO stewards;
2. Attestations and due diligence reporting to ensure abidance with the new policies and the existing CSSA confidentiality policy; and
3. An amendment to the Code of Conduct to apply to all SO staff. RPRA will be consulted before SO hires any new consultants to ensure consistency with the submitted plan.

RPRA staff have assessed the additional measures proposed and deem the plan satisfactory.



SO may communicate the Authority's decision after the Authority publishes its decision, which we anticipate within the next 3 days. Copies of the plan will be made available upon request from SO or RPRA.

Finally, on behalf of the Authority, I would like to express my appreciation for the diligence and cooperation of the SO Board of Directors and staff in reaching yet another critical milestone. We look forward to continuing the collaborative approach established between SO and the Authority in the successful implementation of the wind-up plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Denton'. The signature is fluid and cursive, with the first name 'Frank' and last name 'Denton' clearly distinguishable.

Frank Denton
CEO, Resource Productivity and Recovery Authority

Copy Robert Poirier
Chair, Resource Productivity and Recovery Authority