



MHSW Program Plan Report on Consultation

August 23, 2012

Table of Contents	Page
1.0 Introduction and Background	3
1.1 Background to the Program Plan Development	3
2.0 Objective and Scope of the Consultation Process	4
2.1 Objective	4
2.2 Scope	5
3.0 Key Participants in the Consultation	5
3.1. Industry Stewards	5
3.1.2 Industry and Trade Associations	5
3.2 Municipalities	6
3.3 Affected Industries	6
3.4 Other Interested Parties	7
4.0 Elements of Consultation	7
4.1 Stewardship Ontario Website	7
4.2 Database of Identified Stakeholders	7
4.3 Electronic Notices to Identified Stakeholders	7
4.4 Ministry of the Environment and Waste Diversion Ontario	8
4.5 Multi-Stakeholder Public Consultation Meeting	8
4.5.1 August 23, 2012 Consultation Participants	9
4.5.2 Comments Received	9
4.6 Consultation with Municipalities	10
4.7 Consultation on Governance Section of the Program Plan	10
5.0 Plan Submission and Explanation of Results	11
Appendix A: August 23, 2012 Consultation Participants	13
Appendix B: Summary of Stakeholders' Comments Submitted	15
Following Consultation Meeting to Review MHSW Program Plan	

1.0 Introduction and Background

This Report on the Municipal Hazardous or Special Waste (MHSW) Program Plan (revised August 2012), (“Consultation Report”) describes the consultation activities undertaken by Stewardship Ontario (SO) during the development of the revised Municipal Hazardous or Special Waste Program Plan (Program Plan) and is intended as a companion piece to the Program Plan.

This document includes a description of the consultation process, the participants, all comments received and how those comments were addressed in the development of the Program Plan.

1.1 Background to the Program Plan Development

On December 11, 2006, the Minister of the Environment filed Regulation 542/06 under the Waste Diversion Act (WDA) designating Municipal Hazardous or Special Waste (MHSW).

On December 12, 2006, in a Program Request Letter to the Waste Diversion Ontario (WDO) Board of Directors, the Minister of the Environment directed WDO to develop a diversion program for MHSW and stipulated that Stewardship Ontario act as the Industry Funding Organization (IFO) for the MHSW Program. Products included under Phase 1 of the program were:

- Antifreeze, and the containers in which it is contained
- Fertilizers, fungicides, herbicides, insecticides, or pesticides, and the containers in which they are contained
- Containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil
- Oil filters
- Paints and coatings, and the containers in which they are contained
- Pressurized containers
- Single use dry cell batteries
- Solvents, and the containers in which they are contained

The MHSW Program Plan for Phase 1 was submitted to the Minister of the Environment on December 6, 2007. On February 19, 2008, the Minister approved the Program Plan and the Program commenced on July 1, 2008.

On July 22, 2008, in a Program Request Letter to the WDO Board of Directors, the Minister provided direction on the development of the subsequent phases of the MHSW program and requested the development of an amended MHSW program to include all MHSW designated under Phase 2 and Phase 3, in addition to materials currently included in Phase 1.

The Consolidated MHSW Program Plan for Phases 1, 2 and 3 was submitted to the Minister of the Environment on July 31, 2009. On September 22, 2009, the Minister approved the Program Plan and the program commenced on July 1, 2010.

On July 21, 2010, the Minister of the Environment filed Regulation 298/10 which suspended the payment of fees on the products that result in Phase 2 and 3 MHSW. The suspension was made permanent by Regulation 396/10 on October 18, 2010.

On October 25, 2010, in a Program Request Letter to the WDO Board of Directors, the Minister of the Environment directed WDO to develop a revised MHSW program that continues to collect and manage Phase 1 wastes but that excludes Phase 2 and 3 wastes. As part of the process of developing a revised program plan, SO consulted extensively with stewards on revisions to the nine Phase 1 MHSW definitions in early 2011. In March 2011, those revised definitions were submitted to the Minister of the Environment for approval.

On February 9, 2012, the Minister of the Environment filed Regulation 11/12 which amended Regulation 542/06 by adding clauses setting out the manner in which deficit recovery fees and quarterly fees are to be calculated and recovered.

On May 31, 2012 the Minister of the Environment sent a letter to Stewardship Ontario advising that the revised definitions were approved and must take effect on October 1, 2012. On July 13, 2012 SO hosted a webcast with MHSW stewards to refresh their familiarity with the revised definitions and to advise them on the associated changes to the MHSW Rules and reporting requirements.

With the approval of the revised material definitions and the new O.Reg 11/12 in place, Stewardship Ontario's way opened up to proceed with the preparation of the revised MHSW Program Plan in co-operation with Waste Diversion Ontario, and with the Ministry of Environment as an observer. On August 15, 2012, Stewardship Ontario's board of directors approved the Program Plan for stakeholder consultation.

2.0 Objective and Scope of the Consultation Process

2.1 Objective

Stewardship Ontario has been operating the MHSW Program for the nine Phase 1 materials since July 1, 2008. The Program Plan therefore reflects an operating program for which annual reports, containing program performance data and audited financial statements, have been available for the past four years. In addition, as noted above, stewards were consulted on the revised material definitions which provide the basis for the Program Plan. Therefore, there is a higher degree of familiarity amongst some stakeholder groups with the details around how the MHSW program has been operating. That said, Stewardship Ontario's objective was to develop and implement a consultation process that was thorough and ensured that the Program Plan reflected the information, ideas, and opinions contributed by all affected stakeholders.

The purpose of this Consultation Report is to summarize the results of the consultation process in a document that will accompany the submission of the Program Plan to the Minister of the Environment.

2.2 Scope

A number of parties are stakeholders of the Program Plan including: stewards, defined as the brand owners, first importers, franchisors, or manufacturers of products for use in Ontario that result in the generation of MHSW, as well as the industry associations that support their work; municipalities, as an important group of collectors of MHSW in Ontario; waste management companies that are responsible for the end-of-life management of MHSW; Industrial, Commercial and Institutional (IC&I) generators of MHSW; environmental and community groups interested in the management of MHSW; and the general public.

3.0 Key Participants in the Consultation

3.1 Industry Stewards

MHSW Stewards are defined as the brand owners, first importers, franchisors, or manufacturers of products designated as Municipal Hazardous or Special Materials (MHSM), use of which eventually results in the generation of MHSW. This group refers to companies or entities who have registered with Stewardship Ontario originally under Phase 1, and those who, effective October 1, 2012, are responsible for registering as a result of the expansion of the scope of some of the original Phase 1 materials: antifreeze (now includes all IC&I – packaged and bulk); single use dry cell batteries (now includes all IC&I); and paints and coatings (now includes bitumen-based coatings and sealers).

3.1.2 Industry and Trade Associations

Industry and trade associations may assist in the identification and notification of individual company representatives, who are their members and may have represented their members during the consultation process. Participating associations included but were not limited to:

Association of International Automobile Manufacturers of Canada

Automotive Industries Association of Canada

Canadian Consumer Specialty Products Association

Canadian Hardware and Housewares Manufacturers Association

Canadian Fertilizer Association

Canadian Paint and Coatings Association

Canadian Propane Association

Electro-Federation Canada (Battery Division)

Food & Consumer Products of Canada

Retail Council of Canada

3.2 Municipalities

Many municipalities in Ontario either operate permanent depots at which residents may drop off MHSW or hold scheduled collection events at which residents may drop their MHSW. All municipalities that participate as collectors for the MHSW program were invited to participate in the consultation process. Municipalities or representatives of municipalities that participated include but are not limited to:

Association of Municipalities of Ontario (AMO)

City of Barrie

City of Ottawa

City of Thunder Bay

City of Toronto

County of Northumberland

County of Peterborough

Municipal Waste Association (MWA)

Regional Public Works Commissioners of Ontario (RPWCO)

Regional Municipality of Peel

Regional Municipality of York

3.3 Affected Industries

Participating representatives of the industries that might be affected by the implementation of the program included but were not limited to:

Retailers of products that might result in MHSW

Private companies providing collection of MHSW

Transporters of MHSW

Processors and recyclers of MHSW

End markets of recycled MHSW

Professionals working in related fields

3.4 Other Interested Parties

Other participating organizations/individuals with an interest in the implementation of the program included but were not limited to:

Provincial government representatives

Waste Diversion Ontario

Environmental Defense

Conservation Council of Ontario

Canadian Institute for Environmental Law and Policy

Ontario Paint and Contractors Association

Ontario Environment Industry Association

Environmental Commissioner of Ontario

Citizen's Network on Waste Management

Ontario Environment Network

Toronto Environmental Alliance

4.0 Elements of Consultation

Describes the different tools and activities available to stakeholders and used by Stewardship Ontario to submit and receive comment on the draft Program Plan.

4.1 Stewardship Ontario Website

Information on the development of the Program Plan is provided on a [dedicated page](#) on Stewardship Ontario's website which contains the documents pertaining to development of the Program Plan. In addition, documents supporting the [July 13, 2012 Information Webcast](#) for stewards on the revised material definitions are also available on Stewardship Ontario's website.

4.2 Database of Identified Stakeholders

A regularly-updated list of identified stakeholders in database format was used to inform stewards and stakeholders of the consultation activities.

4.3 Electronic Notices to Identified Stakeholders

Electronic notices for both the July 13, 2012 and the initial invitation to the August 23, 2012 consultation were emailed out to stakeholders. In the case of the August 23, 2012 consultation, notices were sent to

over 1,800 recipients on July 27, 2012. A follow up reminder email for the August 23, 2012 meeting was sent out to the same list on August 16, 2012, and it contained links to the draft MHSW Program Plan, a discussion document, and a meeting agenda.

4.4 Ministry of the Environment and Waste Diversion Ontario

Throughout the development of the Program Plan, Stewardship Ontario held regular meetings with staff from Waste Diversion Ontario with the Ministry of Environment as an observer. The meetings can be characterized as iterative reviews of the Program Plan, and included the preparation by Stewardship Ontario for review by the group of in-depth discussion papers on specific elements of the Plan. Those meetings took place on the following dates:

July 12, 2012

July 18, 2012

July 26, 2012

August 1, 2012

August 9, 2012

August 13, 2012

August 31, 2012

September 11, 2012

September 19, 2012

4.5 Multi-Stakeholder Public Consultation Meeting

On August 15, 2012, Stewardship Ontario's board of directors approved the plan for stakeholder consultation. On August 23, 2012 Stewardship Ontario hosted a public consultation on the draft Program Plan. Registrants participated both via webcast and in-person. As noted above, electronic invitations and reminder notices were sent out to over 1,800 members of identified stakeholder groups. The notice to stakeholders contained a [link to relevant documents](#) pertaining to the Program Plan as follows:

- Draft Program Plan
- Discussion Document
- Consultation Meeting Agenda

Following the consultation meeting the follow documents were also posted:

- Webcast of the August 23, 2012 Consultation Meeting

- Presentation Material provided at the August 23, 2012 Consultation Meeting
- Questions and Answers raised at the August 23, 2012 Consultation Meeting

The primary objective of the consultation was to describe and explain the components of the draft Program Plan to ensure stakeholders are familiar with it, and to hear directly from them, answer their questions, and solicit additional feedback in formal submissions.

Registrants were encouraged to read the draft Program Plan prior to attending the consultation. The Program Plan was posted on Stewardship Ontario's website a week prior to the August 23rd meeting. At the meeting Stewardship Ontario provided an overview of the draft Program Plan and discussed in some detail the following plan components:

- Municipal Hazardous or Special Waste
- Program Design
- Program Cost Elements
- Program Performance

Interested participants were requested to provide their submissions to Stewardship Ontario by September 7, 2012.

The team also provided MHSW stewards with an update on implementation of Ontario Regulation 11/12 and discussed proposed MHSW Rule changes associated with the Program Plan to come into effect on January 1, 2012. Specifically stewards were requested to provide input on whether they support the disaggregation of antifreeze reporting to reflect diluted and concentrate. Paints and Coatings stewards were asked if additional reporting categories, e.g., ≥ 5 to 14 litres and ≥ 14 to 30 liters should be added.

4.5.1 August 23, 2012 Consultation Participants

A list of organizations and individuals that participated either by webcast or in-person is available at Appendix A to this document.

4.5.2 Comments Received

The following organizations sent comments to Stewardship Ontario for the Program Plan Consultation post August 23, 2012:

Association of Internal Automobile Manufacturers of Canada

Atlas Copco Compressors Canada

Canadian Consumer Specialty Products Association

Canadian Fertilizer Institute

Canadian Paint and Coatings Association

County of Peterborough
Electrical Council Electro-Federation Canada (Battery Section)
Hall-Chem
Hotz Environmental
Monarch Oil (Kitchener) Limited
Niagara Region
Ontario Painting Contractors Association
Ontario Waste Management Association
Praxair Distribution Inc.
PremierTech Home and Garden
Recochem Inc.
Regional Municipality of York
Retail Council of Canada
S.C. Johnson and Son Limited
Scotts Canada Ltd.
The Clorox Company of Canada
Toronto Environmental Alliance
Toronto Lube Service

4.6 Consultation with Municipalities

On September 12, 2012, Stewardship Ontario met with representatives from RPWCO, AMO and MWA to discuss the role of municipalities in collecting MHSW as part of the MHSW program. Municipal associations were also invited to provide their feedback on the Program Plan.

4.7 Consultation on Governance Section of the Program Plan

Section 5 of the MHSW Program Plan provides the proposed composition and appointment of the Board of Directors for Stewardship Ontario. It was developed by the Governance and Nominating Committee (GNC), a standing committee of the Stewardship Ontario board. Given that the MHSW Program is returning to its original nine material scope, the GNC saw merit in providing for flexibility to adjust the number of board members depending on board workload and specific skill sets required, the life cycle stage of the organization (start up versus maturity) and the availability of skilled candidates in the director pool. Stewardship Ontario proposes to maintain the current complement of independent

directors at two and institute a maximum threshold of fourteen industry directors and a minimum threshold of eight industry directors.

Stewardship Ontario also proposes utilizing an election process whereby each steward is entitled to one vote for each dollar paid to Stewardship Ontario in the most recently completed fiscal year. This is a change from the current process which provides each industry association with one vote for every \$10 million that their members collectively represent in stewardship fees.

On September 27, 2012 the new governance election process was presented to members of Stewardship Ontario's Stakeholder Advisory Committee for comment. A copy of the Governance section of the MHSW Program Plan was emailed to all Committee members with the request that they review and provide comment. No comments were provided by the publication date of the Program Plan.

The Committee is comprised of industry associations that represent Stewardship Ontario's steward community for both the Blue Box and the MHSW Programs. The Stakeholder Advisory Committee member organizations are as follows:

Alliance of Ontario Food Processors (AOFPP)

Automotive Industries Association of Canada (AIA)

Canadian Association of Chain Drugstores (CACDS)

Canadian Beverage Association (CBA)

Canadian Consumer Specialty Products Association (CCSPA)

Canadian Federation of Independent Grocers (CFIG)

Canadian Hardware and Housewares Manufacturers Association (CHHMA)

Canadian Newspaper Association (CNA)

Canadian Paint & Coatings Association (CPCA)

Canadian Propane Association (CPA)

Canadian Restaurant and Foodservices Association (CRFA)

Electro-Federation Canada (EFC)

Food & Consumer Products of Canada (FCPC)

Ontario Dairy Council (ODC)

Retail Council of Canada (RCC)

5.0 Plan Submission and Explanation of Results

The draft Program Plan published August 15, 2012 and revised September 14, 2012 incorporates responses to comments received during the consultation process. A table providing comments ordered by Program Plan Design Component and Stewardship Ontario's responses is provided as Appendix B to this document.

The Program Plan, revised to reflect stakeholder comments, was submitted to Stewardship Ontario's Board on September 21, 2012. Following Board consideration, the Program Plan will be submitted to the WDO. The WDO is expected to submit the Program Plan to the Minister at which point is then expected to be posted on the Environmental Registry for further consultation.

Appendix A: August 23, 2012 Consultation Participants

3M Canada, Sheila Buttery	Canadian Tire Corp., Sarah Webb	City of St. Thomas, Michelle Shannon	Golder Associates Limited, Kimberly Luces
Aevitas, Dan Power	Canadian Tire Corporation, Delphine Lagourgue	City of Thunder Bay, Jason Sherband	Groupe Jean Coutu, Gills Carrier
Affinia Canada ULC, Bert Verriet	Canon Canada Inc., Daniela Agnoletto	City of Toronto, Dennis Lam	Hall-Chem Mfg. Inc., Hans Parik
Agrico Canada Limited, Mike Pastir	CCSPA, Anne McConnell	City of Toronto, Helen Brillinger	Halton Region, Allison Tyldesley
Agrium Advanced Technologies, Laura Coleman	Champion Laboratories Inc, Ginger Boewe	Corp of the City of Sault Ste Marie, Gary Barnes	Halton Region, Nicole Meek
Akzonobel Canada, Remy Delisle	Chatham-Kent, Rick Kucera	County of Bruce, Kerri Meier	Hawkesbury Joint Recycling, Robert Lefebvre
AMO, Rob Milligan	Chevron, Robert Meachen	County of Peterborough, Catrina Switzer	Henkel, Donna Houston
Amway Canada Corporation, Greg Venderven	CHHMA, Vaughn Drofford	County of Peterborough, Mark Cross	Henry Company, Victor Uy
Association of International Automobile Manufacturers of Canada (AIAMC), Loulia Kouchaji	CHHMA, Duncan Deans	CPCA, Susan Peterson	Hewlett Packard, Shaun Monteiro
At Your Disposal Environmental, Tom Kahler	Chrysler Canada Inc., Melissa Coletti	Cromac Inc., Lesley McGregor	Holmes Agro, Michelle Lillie
Atlas Copco Compressors Canada, Ida Vasghanian	City of Brantford, Elizabeth Ramsay	Custom Building Products, Ed Brownsett	Home Depot, Jeff Cattanach
BASF Canada, Claude Beaudoin	City of Brockville, Chris Wood	Darch Fire, Susan Miller	Home Hardware Stores Limited, David Bois
Beauty Systems Group (Canada), Inc, Kelly Hasse	City of Clarence-Rockland, Denis Longpre	Darch Fire, John Darch	Honda Canada Inc., Akemi Kitamura
Behr Process Corp, Michael Butler	City of Cornwall, Nicole Robertson	District of Muskoka, Jamie Delaney	Hotz Environmental Services Inc., Alec Thomas
Ben, Jennifer Chen	City of Greater Sudbury, Renee Brownlee	Drain-All Ltd., Stephen Huza	Hotz Environmental Services Inc., Alfred Seto
Best Buy Canada, Christa Copeland	City of Greater Sudbury, Chantal Mathieu	Drain-All Ltd., Steve Tebworth	Houghton Canada Inc, Catherine King Ward
Bradford Greenhouses Limited, Ryan Somerville	City of Greater Sudbury, Steph Roberts	Electro-Federation Canada, John Bailie	Indigo Books & Music Inc, Willow Guy
Brendar Environmental Inc., Torin Macpherson	City of Greater Sudbury, Lisa Finnamore	Empack Spraytech Inc., Hadeel Neddaff	IPEX Managment Inc., Amy Slattery
Caledon Propane Inc., Andrew Winnik	City of Guelph, Amy Spence	Energizer Canada, Shari Kirkconnell	itw paslode, Craig Pappin
Caledon Propane Inc., George Olah	CITY OF KAWARTHA LAKES, Roberta Perdue	Envirotech Associates Ltd., Susan Lower	Janssen Inc., Ross Copp
Canadian Auto Stores, Bonnie Chandler	City Of Kenora, Mukesh Pokharel	EPI, Janet Congdon	John Deere Canada ULC, Pat Winstanley
Canadian General Filters Ltd, Ruby Newhook	City of Kingston, John Giles	Essex-Windsor Solid waste authority, Eli Maodus	Karrys Bros., Ltd, Sherri MacLeod
Canadian Propane Association, Peter Maddox	City of Kingston, Craig Warden	EWSWA, Cameron Wright	Katz Group Canada, Dave l'Anson
	City of London, Anne Boyd	Feldcamp Equipment Limited, Frieda Feldcamp	Keith R. Thompson Inc, Patrice Campeau
	City of London, Wesley Abbott	GFL Environmental East Corp., Carl Krizan	Kidde Canada Inc., Greg Price
	City of Orillia, Greg Preston	GFL Environmental East Corp., Doug DeCoppel	Kleen Flo Tumbler Ind. Ltd, Chetan Patel
	City of Peterborough, Virginia Swinson		

Appendix A: August 23, 2012 Consultation Participants

Kleen Flo Tumbler Ind. Ltd, Kawall Bharrat	OWWRC, Sue McCrae	Safety-Kleen, Ed Glavina	Morden
Kleen Flo Tumbler Ind. Ltd, Chris Osborne	OWMA, Peter Hargreave	SC CLS Holdings ULC o/a Complete Lube Supply, Angela Tian	Volvo Group NA, Maria Watson
KUUS Inc., Danielle Lewis	OWMA, Rob Cook	SC Johnson, Heather Barker	Volvo Trucks Canada, Catherine Lai
Lawrason's Inc, Kannan Kumarasamy	Petro-Canada Lubricants Inc., Morris Donald	Scotts Canada Ltd., Valerie Bertrand	VTech Technologies Canada Ltd, Nathalie Tea
Legislative Assembly of Ontario, Michael Harris	Photech, Shawn Barlow	Sears Canada, David Klar	Wakefield Canada Inc., Mark Gibb
Legislative Assembly of Ontario, Shane Buckingham	Pnewko Brothers, Bob Martin	Selectone Paints Limited, Jeff Goodman	Wakefield Canada Inc., David Fifield
Lenovo, Patty Chuang	Porsche Cars Canada Ltd, Jay Harding	Shoppers Drug Mart, Shabbir Beawerwala	Walmart Canada, Terry Yee
Loblaw Companies Limited, Paolo Di Bartolomeo	Praxair Canada Inc, Hassan Rahal	Shrader Canada Limited, Scott Robertson	Waste Diversion Ontario, Mary Cummins
Loop Paint, Josh Wiwcharyk	Premier Tech Home & Garden Inc., David Watson	Spin Master Ltd., Scott Smith	WD-40 Company (Canada) Ltd., DanTasson
LOVELAND PRODUCTS CANADA INC., Shannon Burnett	Procter & Gamble Inc., Susan Nieuwhof	Stericycle, Brad Wright	WD-40 Company (Canada) Ltd., Anne Barbuto
Lowe's Canada, Angela Loknath	Quantex Technologies Inc., Marco Dalla Nora	Target Canada, Laura Selanders	WDO, David Marriman
Manchester Tank Canada, Steve Benko	Quinte Waste Solutions, Jeanne Vilneff	Target Canada Co., Jen Barbazza	Whirlpool Canada, N. Ellacott
MGA Entertainment, Johnson Wan	Radiator Specialty, George Eckford	TGB Canada Inc., Alice Ponciano	Woodplus Coatings Group LTD, Jannifer Rachiele
Michaels, Henry Vens	Radiator Specialty Company of Canada, Sheryl Christensen	The Clorox Company of Canada Ltd., Shan Chaudhuri	Würth Canada, Olivier Depenweiller
MOE, Joanna Ranieri	Raw Materials Company Inc, Andrew Paupst	The Nation Municipality, Mary McCuaig	Yamaha Canada Music, Gillian Mosher
Monarch Oil (Kitchener) Limited, Keith Brighton	Recochem Inc., Angelo Macchia	The Sherwin Williams Company, Tim Knapp	York Region, Irina Udaltsova
Municipality of North Perth, Mark Hackett	Region of Durham, David Metcalfe	Toronto Environmental Alliance (TEA), Emily Alfred	
Municipality of North Perth, Leanne Marks	Region of Peel, Grace McKenzie	Toronto Lube Service, John Woodcock	
Navistar Canada Inc, Megi Dawidow	Region of Peel, Matthew Stevens	Toshiba of Canada, Chantale Mantha	
Niagara Region, Bob Vanyo	Region of Waterloo, ShahinVirani	Town of Carleton Place, Dan Varcoe	
Norfolk County, Jennifer Wilson	Regional Municipality of York, Laura Fiore	Town of Fort Frances, Doug Brown	
NutriAg Ltd, Julie Nykamp	Retail Council of Canada, AllenLangdon	Township of North Glengarry, Linda Andrushkoff	
Ontario Painting Contractors Association, Andrew Sefton	Rona, Dian Berleur	Township of Southgate, Raylene Martell	
Ottawa Valley Waste Recovery, Dave Bromley	RPM ENVIRONMENT, Pascal Bissonnette	Toyota Canada Inc., Aby Siva	
	RPM Environment, JC Girard	Transit Lubricants, Frank Flynn	
	Safety-Kleen, Mike Campbell	Unisource Canada, Inc., Tracey	

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Steward and/or Association	Accessibility	The proposed increase in accessibility points and the number of events do not offer detail or cost projections, nor does it appear that there has been a cost / benefit analysis on the subject. The law of diminishing marginal returns dictates that it is not in the best interest of Ontario or the electorate to pursue every possible item for collection.	<p>We agree that achieving value for money is a primary objective, and we are not interested in pursuing every possible item for collection regardless of cost. At the same time, we do need to collect enough material to meet our current and annually increasing targets. To that end, new collection sites are a key component in our work to achieve our targets.</p> <p>Rest assured that Stewardship Ontario will conduct a thorough needs analysis each year to determine the types of collection sites necessary.</p> <p>That said it is also important to note that generally, there is no capital cost incurred by Stewardship Ontario to establish new collection sites since the service providers establish the sites.</p>
Steward and/or Association	Accessibility	On a more general note, as raised at the information session, we would prefer to see a specific target/measure for accessibility. Merely adding collection sites without some evaluation of benefit just adds cost to the program.	New collection sites are a key component in our work to achieve our targets. Rest assured that Stewardship Ontario will conduct a thorough needs analysis each year to determine the types of collection sites

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			<p>necessary.</p> <p>It is important to note that generally, there is no capital cost incurred by Stewardship Ontario to establish new collection sites since the service providers establish the sites.</p>
Steward and/or Association	Accessibility	<p>Table 3.2 indicates that over the plan's 5-year term (2012 to 2017) 1000 additional new collection sites and collection events will be added. While we understand the program's mandate is to increase accessibility, [we] question whether or not such a large increase (a 143% increase over the current 695 collection depots/retailers/events) is necessary to bolster accessibility. We note that this number of additional outlets will certainly increase program costs, which will have to be paid for by the stewards. [We], and SO stewards, have strongly suggested that there be a documented cost-benefit review completed to substantiate 1000 additional outlets being added. Further, it would also be most helpful for stewards to know if Stewardship Ontario is willing to share this review with the stewards that will be impacted by this change to the program plan.</p>	<p>New collection sites are a key component in our work to achieve our targets. Rest assured that Stewardship Ontario will conduct a thorough needs analysis each year to determine the types of collection sites necessary.</p> <p>It is important to note that generally, there is no capital cost incurred by Stewardship Ontario to establish new collection sites since the service providers establish the sites.</p> <p>To clarify, as illustrated in Table 3.2, there are currently 3,687 sites that collect from residential and small quantity IC&I generators. The 1,000 additional sites that will be added over the five years of the revised MHSW</p>

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Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		These are the types of questions stewards need answered in advance of decisions being made impacting their business. We strongly believe that stewards must be consulted in advance of decisions that will only drive program costs for which they are fully responsible.	Program Plan represent an increase of 27%. This is less than the 5 year increase in collection targets.
Steward and/or Association	Accessibility	Insufficient data has been provided to support accessibility targets. Under this new Program Plan, it is proposed that there will be additional events and sites established for collection, yet costs for these activities were not presented. As a fee-paying steward, I believe we have a right to have this information before agreeing to a new Program Plan.	Generally, there is no capital cost incurred by Stewardship Ontario to establish new collection sites since the service providers establish the sites.
Municipal Service Provider	Accessibility	How does SO plan to take into consideration the need for accessibility in remote and sparsely populated areas and how would they be defined?	Stewardship Ontario has proposed accessibility targets by region of the province, as outlined in Table 3.2. Analysis will be conducted to determine which areas within these regions to specifically target.
Municipal Service Provider	Accessibility	Definitions of 'effective' and efficient' as they pertain to collections, what criteria are used in 'performance reviews?	The benchmark for 'effective' and 'efficient' varies depending on the type of collection site and area of the province. Collection sites will be measured against other similar collection sites

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		<p>Identification of criteria is essential to collection sites (especially municipalities) to develop a suitable matrix for collection sites/events so there are no surprises. The matrix could be provided to municipalities and be incorporated into their analyses. Matrix could include factors for the number of tonnes collected, number of cars, cost per car, cost per tonne, and number of residents served in the area. Although the plan mentions 'remote and sparsely populated' it does not differentiate between rural and urban or set separate targets for new sites or events.</p>	<p>to assess their relative performance.</p>
Municipal Service Provider	Accessibility	<p>Table 3.2 identifies the number of sites and events total by region however these numbers do not match up at all with Table 3.1. Perhaps more clarity is required to differentiate between the two tables. Also in Table 3.2 it may be relevant to have targets for new sites and events based on rural and urban and showing the number of new sites available for municipalities, return to retail, specialty service channel and other (such as the propane initiative).</p>	<p>The differences between Tables 3.1 and 3.2 are the collection sites that service the IC&I sector only. Additional text has been added as a footnote to Table 3.2 to add clarity.</p>
Steward and/or Association	Accessibility	<p>Insufficient data has been provided to support accessibility targets. Under this new Program Plan, it is proposed that there will be additional events</p>	<p>Generally, there is no capital cost incurred by Stewardship Ontario to establish new collection sites since the service providers establish the</p>

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Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		and sites established for collection. Yet, costs for these were not presented. This is another example where crucial data has been left out of the consultation documentation. There should be a cost benefit analysis to support Stewardship Ontario's work to expand collection points. At a minimum, the quantitative cost information is needed; but cost/benefit considerations should also be discussed.	sites.
Steward and/or Association	Antifreeze (Bulk)	Stewardship Ontario has asked for input on instituting fees on bulk antifreeze. From our viewpoint there should not be fees on bulk antifreeze as most bulk containers are either dedicated containers or cleaned at cost by the packagers.	Fees on antifreeze are to manage recovered antifreeze. The reference to 'containers with a volume equal to or less than 30 litres' is used to distinguish between packaged and bulk. Bulk is assumed to be held in containers with a volume greater than 30 litres; bulk antifreeze is included but its large container (for example, a tank) is not.
Steward and/or Association	Antifreeze (Bulk)	It should be clear to you after the recent meeting that Stewardship is not working. If the goal is to reduce Waste from landfill what is bulk AntiFreeze being considered? There is a private entity doing an excellent job of recycling waste antifreeze.	The definition of antifreeze, approved by the Minister of Environment in May 2012, includes antifreeze from residential and all IC&I generators. As bulk antifreeze is supplied to IC&I generators, it is included.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Steward and/or Association	Antifreeze Reporting	Regarding the question, do stewards have a preference to continue with amalgamated volume reporting as is current practice or separate reporting for concentrate and premix volumes. Our position is to maintain consistency with other EPR programs and to that end would advocate for separate reporting of concentrate and premix volumes. This same protocol is as adopted in the BC, MB and QC provincial programs.	Comment noted.
Steward and/or Association	Antifreeze Reporting	As for separate fees on concentrated or diluted antifreeze we also feel there should not be separate rates as whether concentrated or diluted it should not change the costs for recovery.	<p>Dilution of concentrated product during use increases the volume that will be returned. Separate reporting of diluted and concentrate would allow Stewardship Ontario to apply a conversion factor to the units of concentrate to reflect the dilution during use so that the units of concentrate and units of premixed consistently reflect the form of the Antifreeze when it is collected. This ensures that the cost of managing the collected volume of Antifreeze is allocated fairly to stewards of premixed and concentrated Antifreeze.</p> <p>Example for illustrative purposes: 100 litres of premixed Antifreeze and 75 litres of concentrate Antifreeze are reported by</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			stewards. 75 Litres of concentrate Antifreeze is multiplied by 2 to represent the dilution during use and the amount of antifreeze available for installation.
Steward and/or Association	Antifreeze scope	As to the changes Stewardship Ontario is making to the Antifreeze. I do not feel it is required. It should not be charged on anything over 30 Litres as Oil is. This product is well looked after by the recyclers at this time.(The same way Oil is) I do not understand why Stewardship Ontario wants to get involved with a program that is working well. The only thing I can see as it is another cash grab for Stewardship Ontario.	The definition of antifreeze, approved by the Minister of Environment in May 2012, includes antifreeze from residential and all IC&I generators. As bulk antifreeze is supplied to IC&I generators, it is included. Antifreeze fees cover the cost to manage recovered antifreeze and containers less than 30 litres that are returned to MHSW collection sites with waste antifreeze. Containers with a volume greater than 30 litres, including bulk antifreeze containers (for example, a tank), are not included in the MHSW program.
Municipal Service Provider	Appendix B	The maps provided are very difficult to read. Perhaps a break between north and south with a different way of showing the collection sites.	The maps demonstrate provincial coverage and are not intended to be used to identify specific sites.
Municipal Service Provider	Available for Collection	SO has used a factor to determine the amount that may be available for collection. Are these 'factors'	The Available for Collection factors are provided in Appendix A.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>available?</p> <p>Also, an overall goal could be to reduce the amount of material available for collection in the first place. This could mean a shift in how materials, such as paint, are packaged and marketed to consumers. Realizing the infrastructure costs could be significant however the savings in Stewards' fees over the long term may offset this initial investment.</p>	<p>Comment noted.</p>
Steward and/or Association	Available for Collection	<p>Issues with determination of the Available for Collection factors. While the new method of determining the quantity available for collection, e.g., based on the preceding year's, rather than the preceding quarter's, sales seems reasonable, members have issues with the determination of the "Available for collection factor". Based on the lack of data to substantiate these factors, as well as based on the errors noted over time including within this consultation document, our members have no confidence this factor has been accurately estimated. We ask for further information and transparency as to how these factors were</p>	<p>The assumptions for calculating the Available for Collection factors are included as footnotes to the table in Appendix A. Many of the factors are those used in the CMHSW Program Plan.</p> <p>Available for Collection factors are adjusted to reflect current market research data. Stewardship Ontario welcomes information from industry representatives identifying new market research data.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		estimated.	
Steward and/or Association	Batteries	<p>Our main concern is that while this plan was presented as a minor update of the original 2009 Consolidated MHSW Plan, we feel that significant changes have been made to the single use battery portion without consultation with the stewards.</p> <p>One major change is the use of different methodology for determining “available to collect” (3 year average sales to estimate the quantity available for collection). We believe that this is a simpler method but would like to see a comparison with the original model to understand the impact of this change.</p> <p>The collection targets have also been changed to 25% by 2013 and 35% in 2015. Since a number of the underlying assumptions (model of market size, collection to include only single use batteries as opposed to all consumer type batteries – single use and rechargeable) as well as under-performance of the plan to date, a more thorough and realistic</p>	<p>The available for collection factor for batteries is based on the <i>Directive 2006/66/EC of The European Parliament and of The Council</i>. Primary batteries available for collection in years 3 to 5, based on the methodology utilized in the CMHSW Program Plan, vary between a low of 93% and a high of 96%. There was an underlying assumption of sales growth that has not been observed. The new methodology is simpler and can be updated regularly with less expense to battery stewards. Both the previous and the current models assume that 100% of batteries are available for collection at some point following their supply into the market. The difference in the methodologies is timing.</p> <p>The collection targets are the same as those in the CMHSW Program Plan, adjusted for primary batteries only.</p> <p>The recycling efficiency rate for primary</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>analysis should be conducted.</p> <p>Also, the recycling efficiency rate used has increased significantly from that in the previous plan and establishes targets for recycling that are in excess of those required in Europe or Quebec. Currently, there is only one approved processor capable of meeting this rate. The stewards would like to be party to the discussion of determining recycling efficiency rules and requirements since this has a major bearing on the program cost.</p>	<p>batteries in the revised MHSW Program Plan is the same as the rate used in the CMHSW Program Plan. This fall Stewardship Ontario will launch a battery recycling campaign to encourage consumers to drop more of their batteries off at drop-off locations across the province.</p>
ENGO	Collection Targets	<p>It's good to see progressive targets are mentioned in the program plan - these should be reviewed annually as they could be more aggressive. Specifically, the target recovery rate for single-use batteries is unacceptably low with almost no progress. This target should be much more aggressive. Single use batteries are known to cause environmental harm, and aggressive marketing campaigns combined with expanded collection options (e.g. drop off depots at retailers, municipalities, mail-in programs) could easily bring this much higher.</p>	<p>The Minister of the Environment directed Stewardship Ontario to incorporate the remaining collection targets from the CMHSW Program Plan. As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program.</p> <p>While many single-use primary batteries are benign, a small percentage of those recovered</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			<p>do contain substances that could be harmful to the environment if not disposed of correctly. An important aspect of collection for single-use primary batteries is to recover the metals for reuse in new products and applications which reduces the environmental harm of acquiring virgin materials.</p> <p>Stewardship Ontario has dramatically expanded its collection network for single use primary batteries and has implemented a transportation and processing incentive to encourage increased capture of these materials.</p>
Municipal Service Provider	Collection Targets	The collection targets should be adjusted to reflect the amounts that are being collected. If a material is over target one year then the target should be adjusted.	The Minister of the Environment directed Stewardship Ontario to incorporate the remaining collection targets from the CMHSW Program Plan. As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program. It is expected that the

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			<p>quantity of MHSW that has been stored in basements, garages and sheds for extended periods of time will decline as the program matures.</p> <p>Five year target projections are required in the program plan.</p>
Steward and/or Association	Collection & Diversion Targets	Lack of confidence in collection and diversion targets for each material class. The overall concern with data integrity and availability as described in 2) above, leaves uncertainty about the accuracy of these numbers such as in provided in Table 5.1. These concerns could be alleviated by the provision of verified audit data from lab pack analysis.	The Minister of the Environment directed Stewardship Ontario to incorporate the remaining collection targets from the CMHSW Program Plan. . As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program.
Private Sector Service Provider and/or Association	Collection & Diversion Targets	We are concerned that the Program Plan targets are not reflective of great strides made in the recovery and diversion of certain materials. By way of example, the actual collection rate for oil containers in 2011 was over 70%, while the diversion targets set in the Program Plan gradually increase over the	The Minister of the Environment directed Stewardship Ontario to incorporate the remaining collection targets from the CMHSW Program Plan. As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>next five years from 42% to 62%. Setting targets below the amount already set makes little sense and hinders the increased diversion within the program. SO should revise these numbers upwards based current collection rates and with the goal of continuous improvement.</p>	<p>MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program. It is expected that the quantity of MHSW that has been stored in basements, garages and sheds for extended periods of time will decline as the program matures.</p> <p>Five year target projections are required in the program plan.</p>
Steward and/or Association	Collection & Diversion Rates	<p>Lack of confidence in Diversion Targets, Available for Collection and Collection Rates.</p> <p>Key decisions (and resulting costs) are based on these numbers and all of these factors are in one way or another are tied back to lab pack data. Lab pack data for fertilizers are currently assessed as being 98% Phase 1 which is overstated by many times.</p>	<p>The Minister of the Environment directed Stewardship Ontario to incorporate the remaining collection targets from the CMHSW Program Plan. As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			Most of the lab pack audits have been completed. The data are being reviewed and updated material allocations for commingled materials will be developed. The allocations will be posted on Stewardship Ontario's website together with the audit methodology used to compile the data.
Steward and/or Association	Collection & Diversion Targets	Lack of confidence in collection and diversion targets for each material class. This is based on the issues with data integrity and availability as described in 2) above, and leads members to question the accuracy of these numbers such as in Table 5.1.	The Minister of the Environment directed Stewardship Ontario to incorporate the remaining collection targets from the CMHSW Program Plan. As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program.
Municipal Service Provider	Collector rates	Will the changes in rates being charged stewards include amounts to ensure collectors costs are covered in addition to deficit recovery under Ontario Regulation 11/12? Much of the consultation session on August 23, 2012 seemed to be around concerns	Regulation 11/12, filed by the Minister in February 2012, sets out the methodology that Stewardship Ontario must use to recover quarterly operating costs and historical deficits. The quarterly operating costs reflect the costs

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>of stewards over deficit recovery and this process. This leads to concern that consideration in ensuring collectors are paid appropriately may be taken as a secondary item. The municipality would be interested in receiving further information on how and when any funding gaps will be addressed. Consultation with municipalities on an ongoing basis is recommended.</p>	<p>incurred by Stewardship Ontario to deliver the MHSW program during the prior quarter, including payments to collectors, transporters and processors. Discussions focused on the deficit recovery methodology as this is an area of concern for stewards.</p>
Municipal Service Provider	Co-mingled Phase 1 Material	<p>For any co-mingled Phase 1 material, will Stewardship Ontario continue to provide payments based on labpack factor percentages? When and how often would these factors be reviewed and communicated to collectors? This information is not specifically covered under the Program Plan details.</p>	<p>Where Phase 1 MHSW is commingled with other MHSW for transport, Stewardship Ontario will apply a factor to represent the Phase 1 portion. Stewardship Ontario is currently completing lab pack audits and will be updating the factors for commingled materials. The allocations will be posted on Stewardship Ontario's website together with the audit methodology used to compile the data.</p>
Private Sector Service Provider and/or Association	Consultation and Dispute Resolution Process	<p>Re: Consultation, notice and a 3rd party dispute mechanism should be set out in the Program Plan and the revised Program Agreement. The current Program Plan provides no reference on several issues, which have caused a great deal of tension between service providers, municipalities and SO within the MHSW program. [We have] submitted</p>	<p>It is expected that the MHSW program agreement will stipulate the development of a dispute resolution procedure providing for the resolution of a dispute between SO and a person providing MHSW services. SO will utilize recommendations from KPMG to develop the dispute resolution procedure and</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>numerous letters regarding our concerns about when and how notice of change is provided; when and how consultations are held; and what dispute mechanisms are available when an impasse is reached. We understand SO has employed KPMG to develop recommendations regarding these areas.</p> <p>[We] would advocate clarity should be set out within the Program Plan and within the Program Agreement. In doing so, it provides transparency to all parties in understanding when and how changes might happen and what mechanisms are available for resolution. [We] would be pleased to work with SO and other stakeholders in establishing these parameters in a manner that works for all affected parties.</p>	<p>will consult with service providers before finalizing the procedure.</p>
Steward and/or Association	Consultation Process	<p>These are major changes that we feel require more time to review than provided in a process that occurs during a vacation period with only 2 weeks provided to review and prepare comments.</p>	<p>We apologize for the tight timelines. However, several factors such as the passage this year of Regulation 11/12, and the May 2012 approval of revised material definitions by the Minister of Environment affected the timing of the revised Program Plan. As soon as we had direction to proceed, Stewardship Ontario prepared the revised MHSW Program Plan in</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			co-operation with Waste Diversion Ontario, with the Ministry of Environment as an observer. On August 15, 2012, Stewardship Ontario's board of directors approved the plan for stakeholder consultation.
Steward and/or Association	Consultation Process	I recognize that Stewardship Ontario has been tasked with very tight timelines but must mention that I found it challenging to prepare a complete response due to the limited comment period and without receiving clarification on some key issues. I respectfully request that consideration be given to extend the timelines for consultation and implementation to ensure that meaningful input is obtained for a sound, effective, efficient Program Plan serving Ontarians.	We apologize for the tight timelines. However, several factors such as the passage this year of Regulation 11/12, and the May 2012 approval of revised material definitions by the Minister of Environment affected timing of the revised Program Plan. As soon as we had direction to proceed, Stewardship Ontario prepared the revised MHSW Program Plan in co-operation with Waste Diversion Ontario, with the Ministry of Environment as an observer. On August 15, 2012, Stewardship Ontario's board of directors approved the plan for stakeholder consultation.
Steward and/or Association	Consultation Process	Timelines are too Restricted. Despite the huge effort put forth by Stewardship Ontario (and stewards alike) the timelines are too short for this consultation. The Minister's first request for a new plan was about two years ago yet	We apologize for the tight timelines. However, several factors such as the passage this year of Regulation 11/12, and the May 2012 approval of revised material definitions by the Minister of Environment affected timing of the revised Program Plan. As soon as we had direction to

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		stewards have had two weeks since the August 23 rd consultation to consider the first and only draft of a revised plan. Furthermore, SO has only the weekend to consider stewards' comments and recommendations, so it respectfully begs the question "will stewards' input be adequately considered?"	proceed, Stewardship Ontario prepared the revised MHSW Program Plan in co-operation with Waste Diversion Ontario, with the Ministry of Environment as an observer. On August 15, 2012, Stewardship Ontario's board of directors approved the plan for stakeholder consultation.
Steward and/or Association	Consultation Process	Though the Minister first requested this new Plan nearly two years ago, we are once again facing very short timelines to turn around comments on a very important issue. The inability to allow appropriate timelines for review of the draft and for implementation may compromise, yet again, the MHSW Program. [We] would respectfully request that Stewardship Ontario (SO), Waste Diversion Ontario (WDO) and the Ontario Ministry of Environment (MOE) extend the timelines for consultation and implementation to ensure that meaningful input is obtained for a sound, effective, efficient Program Plan serving Ontarians. A cost benefit analysis is also requested.	We apologize for the tight timelines. However, several factors such as the passage this year of Regulation 11/12, and the May 2012 approval of revised material definitions by the Minister of Environment affected timing of the revised Program Plan. As soon as we had direction to proceed, Stewardship Ontario prepared the revised MHSW Program Plan in co-operation with Waste Diversion Ontario, with the Ministry of Environment as an observer. On August 15, 2012, Stewardship Ontario's board of directors approved the plan for stakeholder consultation.
ENGO	Design for the Environment	There is not enough discussion of or importance placed on decreasing toxicity and reducing environmental harm of products. The draft plan	Comment noted. Stewardship Ontario dialogues with its stewards regarding the opportunities to reduce program costs, which

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		notes that Stewardship Ontario will work with stewards to educate and improve collections and meeting targets, but Stewardship Ontario can and should also be playing a role in promoting continual improvement in reducing toxicity and potential environmental harm of the materials in production, collection and treatment.	typically reflect environmental management costs.
Steward and/or Association	Discussion Document	The Discussion Document lists just 8 Phase 1 materials. Yet, there are 9 Phase 1 materials.	Thank you for the catch. The document has been corrected.
Other	Eco-fees	We are writing to you to raise concerns regarding the levying of stewardship fees (“eco-fees”) on paints and coatings supplied to our members by paint and coatings stewards in quantities that fall under the “small quantity IC&I” definition of, “Products supplied in containers equal to or less than 30 litres”. Painting contractors typically buy all of their paints in containers 10 litres or less in size in order to minimize repetitive strain injuries associated with continuous movement of heavy paint containers by tradesmen. Accordingly, virtually all paint purchased by painting contractors are subject to eco-fees as passed on by producers on the sale of paint in containers less than 30 litres in size. These eco-fees are being levied on products supplied	<p>Only paint containers containing residual paint are to be returned to MHSW collection sites. Empty paint containers are to be recycled through other programs.</p> <p>The costs levied on stewards of paints and coatings (which they may choose to pass on to you) represent the costs to manage residual paints and coatings and the containers used to deliver the residual paints and coatings to MHSW collection sites. Costs to manage containers used to deliver paints/coatings to collection sites are included in the MHSW program costs.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>to painting contractors notwithstanding the fact that paint contractors typically generate more than 100kg of waste (primarily if not solely paint containers) per month and are not eligible to return these materials to MHSW depots. Unable to avail themselves of the use of MHSW depots, these contractors submit generator registration reports in accordance with subsection 18(1) of the Regulation 347 under the Environmental Protection Act (EPA) and have commercial agreements with third party hazardous/subject waste management companies for the management of their residual paints and paint containers. The outcome is that many paint contractors are paying twice for paint related waste management – once through eco-fees levied by their paint suppliers and again when they have their residual paint materials managed by a third party waste management company. This situation of double payment is clearly inequitable. While Stewardship Ontario has offered painting contractors an opportunity to register as architectural coating waste collection sites whereby Stewardship Ontario then arranges to transport and dispose of waste paint and coatings, this</p>	

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		arrangement has proven to be administratively burdensome and unworkable. As an alternative we suggest lowering the paint container de-minimus to containers less than 3 (three)litres or less in size. By doing so the MHSW program will still be able to address small quantity waste from IC&I businesses while allowing painting contractors to maintain management of their wastes while eliminating duplicative fees from their suppliers.	
Steward and/or Association	Fertilizers	There is currently a reference to containers for liquids in grams and kilograms. Could this be altered to ML/L for liquids?	Kilograms are the units of measure for container weights both for the MHSW Program and the Blue Box Program.
Steward and/or Association	Governance	This section has been left blank in the draft program plan. Could SO please update this section and provide stewards with a copy of the governance overview being included in the plan?	The governance section was under development at the time of the consultation workshop. A draft governance proposal was presented to Stewardship Ontario's Stakeholder Advisory Committee in September.
Steward and/or Association	Harmonization	On the pharmaceutical EPR regulation, we understand it has happened because the industry already had an EPR program that MOE wanted to see retained. The Post-Consumer Pharmaceutical Stewardship Association (PCPSA) wish to facilitate harmonization of the Ontario program with existing programs in BC and Manitoba and seek support of other stakeholders to desired changes. As was	As of October 1, Stewardship Ontario is no longer involved in managing Phase 2 or Phase 3 MHSW. Any future action related to Phase 2 or 3 MHSW resides with the Minister.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>presented as a part of our BBPP comments, we highly recommend to seek cross-provincial harmonization also in the MHSW plan area. Given the experience of managing the large program and Ontario being the most populous and economic engine of our country, we expect SO at the national level to lead and engage with other provinces in harmonizing the MHSW plans. Universal and coordinated approach would have benefits to both stewards and to the stewardship organizations, by offering one-window approach to fulfilling their stewardship obligations. Importantly, IFOs benefit by no longer having to duplicate efforts and cost for functions that are common to all these provincial organizations. A national approach to fee setting will improve collection, processing and recycling practices and end market development for materials leading to efficiencies of resource sharing and cost savings.</p>	
Steward and/or Association	Illustrations on Program Plan Cover	<p>Stewards have for some time raised concerns about the use of their brands and images in depicting MHSW materials. [Our company] has concerns with two of the images currently representing the nine Phase 1 MHSW categories shown on the cover of the</p>	<p>Thank you for bringing these concerns to our attention. We will modify the cover artwork before the Program Plan is sent to the Minister for approval.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		consultation document. Any consumer who has used our brand will recognize these characteristic blue fertilizer crystals as being our brand. Moreover, these products are not Phase 1 materials and therefore, we take issue with them being used to represent the Phase 1 Fertilizer Category. Similarly, the image in the bottom central quadrant depicts what appears to be an agricultural application of a pesticide product. Again, this is not a true representation of a Phase 1 Pesticide material.	
Steward and/or Association	Illustrations on Program Plan Cover	The front page of the consultation document shows two images: blue fertilizer crystals and pesticide application in an agricultural setting – <i>yet neither of these two products are MHSW materials</i> . Why and how has SO chosen to use them to represent the MHSW program?	Thank you for bringing these concerns to our attention. We will modify the cover artwork before the Program Plan is sent to the Minister for approval..
Steward and/or Association	Lab Pack Audits	Supportive information for the draft new Plan is insufficient. For years, the Phase 1 stewards have been requesting verified annual audits/lab packs necessary to determine the amount of each material that is returned. To date, we have not seen this data. Under the new regulation the need for verified audit data is greater than ever. It is critical to delineate and identify individual co-mingled	Most of the lab pack audits have been completed. The data are being reviewed and updated material allocations for commingled materials will be developed. The allocations will be posted on Stewardship Ontario's website together with the audit methodology used to compile the data.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>materials and also to clearly delineate designated from non-designated materials (i.e. from the commingled Phase 1/2/3 materials). As a steward, [we] need assurance that SO will accurately account for only Phase 1 materials meeting the definitions. During the meeting on Aug 23 it was stated that Appendix A of the consultation document provides the results of the audits used to determine the collection factor numbers. However, Appendix A does not provide the MHSW material-specific information that is required to set a fair, accurate Program Plan and for stewards to fully understand the basis for the numbers used. Without this data, [we] feel unequipped to support a new Phase 1 MHSW Program Plan.</p>	
Steward and/or Association	Lab Pack Audits	<p>Data/information provided by Stewardship Ontario to support the draft new Plan is insufficient and stakeholders need an opportunity to consider it prior to approval and implementation. For example, verified annual audits/lab packs, necessary to determine the amount of each material that is returned, is not available. [We] have requested these data for several years now, yet it has not been provided. We understand that the WDO is also</p>	<p>Most of the lab pack audits have been completed. The data are being reviewed and updated material allocations for commingled materials will be developed. The allocations will be posted on Stewardship Ontario's website together with the audit methodology used to compile the data.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>seeking access to these data. Now, necessary verified audits means not only parsing out the data between co-mingled materials (for example, where pesticides, fertilizers, and solvents are in one oxidizer drum) but also from the co-mingled Phase 1/2/3 materials. [We] wish to know how SO will ensure only Phase 1 materials, meeting the definitions, are accounted for accurately. SO mentioned several times during the consultation that there are audits on lab packs and stated that Appendix A of the consultation document provides the results of the audits that were used to inform the collection factor numbers. However, the information in Appendix A does not in any way provide the MHSW material-specific information that is required to set a fair, accurate Program Plan and the transparency for understanding the basis for the numbers used. With the absence of these data, it is not possible for stakeholders, and we would submit also not possible for SO, WDO, or the MOE, to make informed, appropriate decisions to establish or approve a new Phase 1 MHSW Program Plan.</p>	
Steward and/or	Lab Pack Audits	Lack of lab packs and the corresponding lack of reliable data on which to base costly decisions are	Most of the lab pack audits have been completed. The data are being reviewed and

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Association		two significant gaps.	updated material allocations for commingled materials will be developed. The allocations will be posted on Stewardship Ontario's website together with the audit methodology used to compile the data.
Private Sector Service Provider and/or Association	MHSW Management	It is stated that regular reviews of existing programs will be undertaken. Will there be standard frequency of review or will it be as needed?	Reviews are undertaken as needed.
Private Sector Service Provider and/or Association	MHSW Management	If changes are put forward to the existing programs, will there be an opportunity for consultation?	Stewardship Ontario will engage with those affected by changes, through meetings with vendors or associations as appropriate.
Private Sector Service Provider and/or Association	MHSW Management	What will be the adjustment time frame for program participants to comply with any changes?	Notice of program changes will be provided. The period of notice may vary by type of change but will be no less than 30 days.
Private Sector Service Provider and/or Association	MHSW Management	It is stated "Commercial arrangements may include, but are not limited to, contracting for services following a request for qualifications or a request for proposals, contracting for services as a result of sole source negotiation, incentive programs and/or direct delivery of services". To ensure transparency, all "commercial arrangements" should be fully	Collection sites, transporters and processors are listed on Stewardship Ontario's website. The terms of commercial arrangements with collectors, transporters and processors are considered confidential.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		disclosed and made available to the public.	
Private Sector Service Provider and/or Association	MHSW Management	It is suggested that a standardized audit protocol be established to ensure transparency and a level playing field for all participants. This protocol should clearly define the full content of the audit, the trigger point for an audit (timing based e.g. annual or program entry etc.), consistency in appointed auditor performing the review.	Stewardship Ontario utilizes a standardized audit protocol.
Steward and/or Association	Material Definitions	There were many comments about what is exempt and what is not on the previous webcast.[July 13, 2012]. However there does not appear to be any proactive results! Is this on purpose so people will consider it a waste of time trying to deal with Stewardship? That would appear to be consistent with MOE's approach to the entire program. Ignore criticism and it will disappear!	Stewardship Ontario received constructive comments from stewards as a result of the July 13, 2012 webcast on the revised MHSW material definitions. Where we could clarify the material definition tables without expanding or limiting the definitions approved by the Minister of the Environment, we have done so. The material definition tables, as contained in an Appendix to the MHSW Rules have been submitted to the WDO for approval. As soon as they are approved, Stewardship Ontario will notify stewards of their availability on our website.
Municipal Service Provider	Material Specific Costs	Work together with other MHSW IFO's to streamline the reporting system for all service providers. The amount of paper produced, time spent and	Comment noted.

Appendix B: Summary of Stakeholders' Comments Submitted Following Consultation Meeting to Review MHSW Program Plan

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		frustration at different methods would be better spent growing awareness and making a difference rather than sitting in a mountain of paper.	
Municipal Service Provider	Material Specific Costs	The 'factors for payment for service' [page 18] although listed are not specific and do not provide collectors with a benchmark. The benchmark could be a percentage based on rural or urban.	<p>Commercial terms are negotiated between Stewardship Ontario and service providers. The details of these commercial arrangements are confidential.</p> <p>As noted in Section 4.2, not all collection sites are paid for collection services.</p>
Steward and/or Association	Material Specific Costs	<p>Questions around how Program costs are allocated to each of the MHSW materials. These arise given the data integrity issues we have raised including the lab pack audit questions that remain unresolved. Detail is lacking in the current description to fully assess the impacts including how the issue of seasonal categories are accommodated by SO's processes. For example in the case of lab pack analysis, factors such as when the analysis is done, where the lab packs were obtained, and over what period of time the materials were collected, has a significant impact on the results, which in turn can have a significant impact on costs allocated to stewards.</p>	<p>Section 4 of the Program Plan describes the principles utilized to allocate program costs to MHSW materials.</p> <p>The allocations resulting from the lab pack audits will be posted on Stewardship Ontario's website together with the audit methodology utilized to compile the data.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Private Sector Service Provider and/or Association	Material Specific Costs	Transportation: currently the transporter is responsible for providing the transport container (in most MHSW programs). Will this remain the responsibility of the transporter?	Yes.
Private Sector Service Provider and/or Association	Material Specific Costs	Transportation: it is stated that "Factors in payment for service are based on commercial terms between Stewardship Ontario and the transporter". How does this affect the payment relationship between the transporter and the municipality? What is the complete list of factors?	The list provided in Section 4.2 (Approval status as a transporter with Stewardship Ontario; Adherence to all Stewardship Ontario standards, guidelines and procedures; Quantity of material transported; Distance or time travelled; Provision of supplies) is the list as of the drafting of the program plan. The phrase 'may include but are not limited to' allows for changes to the list over time if additional factors are identified, in keeping with the principle of continuous improvement.
Private Sector Service Provider and/or Association	Material Specific Costs	Processing: It is stated that "Factors in payment for service are based on commercial terms between Stewardship Ontario and the processor". How does this affect the payment relationship between the processor and the municipality? What is the complete list of factors?	The list provided in Section 4.2 (Approval status as a transporter with Stewardship Ontario; Adherence to all Stewardship Ontario standards, guidelines and procedures; Material type; Quantity recycled/disposed; Commodity value) is the list as of the drafting of the program plan. The phrase 'may include but are not limited to' allows for changes to the list over time if additional factors are identified, in

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			keeping with the principle of continuous improvement.
Private Sector Service Provider and/or Association	Modification of MHSM Categories	Would this change in categories be considered a “significant change to the program” and therefore require consultation and WDO approval? Changes to the categories could also have significant effect on the waste management costs of the end processor.	MHSM categories are used for steward reporting. Any changes to MHSM categories affect the manner in which stewards report. Changes in MHSW material categories may affect how collectors and processors handle materials. Changes in MHSW material categories are made to better distinguish costs for purposes of allocation to stewards. Stewardship Ontario would engage with affected vendors regarding the implications of a change in MHSW material categories.
Steward and/or Association	Oil Containers Definition	I know for a fact that your “exceptions” under Cat 1 are contradictory. You have several contradictions in Oil containers as previously pointed out.	Containers that contained base oil are excluded from the MHSW Program and containers that contained process oil are included in the program. Stewardship Ontario recently reconfirmed with industry experts that process oil and base oil are two different products.
Steward and/or Association	Oil Container Costs	Stewardship fees have gone up by almost 200% since the new edict from MOE. That is in a period of 6 months. EHC fees have become a significant competitive factor in the marketplace because larger multinationals have decided not to pass along the increased costs. This is something that will be	The initial stewardship fee for oil containers was set to enable Stewardship Ontario to achieve the oil container collection and recycling targets. These targets were very quickly exceeded and current performance is approximately twice the target. This

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		brought to the attention of the appropriate government department and will have serious repercussions. Where the fees have gone up by almost 200% there is no indication that volumes of recycled material have kept pace. Why then has Stewardships costs shot thru the roof? There is no explanation for this.	exceptional collection and recycling performance increased program management costs for oil containers. Stewardship Ontario was constrained in its ability to increase stewardship fees to address growing costs in this material category since 2010 until the Minister filed Ontario Regulation 11/12. The first invoice received by oil container stewards under Ontario Regulation 11/12 reflects actual costs to manage oil containers.
Steward and/or Association	Orphan Waste	Could SO please clarify what parameters or criteria are used to determine whether the quantity of orphan waste is material?	Stewardship Ontario monitors the portion of materials without identifiable labeling during lab pack audits. Where these materials represent a minor portion of the materials sampled, it is assumed that the quantity of orphan waste is not material. To date, this has been the case. Based on operating experience, it is likely that orphan waste would be considered material only if a branded product, previously supplied in significant quantity, becomes non-stewarded due to insolvency where the brand was not purchased by another company.
Municipal Service Provider	Packaging Standards	The revised Program Plan does not specifically include changes to collector standards or address	Stewardship Ontario will be providing updated collection site standards shortly. Care has been

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>potential payment adjustments for collectors. Will the vendor standards be updated accordingly? Without being aware of the updated packaging standards we trust that any changes will not be substantial and add cost to the municipalities' collection program. We strongly encourage Stewardship Ontario to provide any updates on the packaging standards as soon as possible so we are able to review and implement any changes prior to the start of the new program on October 1, 2012.</p>	<p>taken to minimize any additional work effort required by collection site operators.</p>
Steward and/or Association	Paints and Coatings Available for Collection	<p>Under the proposed draft plan we understand that the paints and coatings sector will include bituminous roofing and driveway sealers - non-bituminous driveway and roofing sealers that have always been included in the Phase 1 program. We note under Appendix A that the proposed section "available for collection" factor is set at 10%. We urge Stewardship Ontario to review the recent Recyc-Quebec study, which pegged the 'available for collection factor' at closer to 7%. The 7% factor should be the basis used for setting targets for the paint and coatings sector.</p>	<p>Comment noted. Stewardship Ontario will review the study.</p> <p>Available for collection factors are adjusted to reflect current market research data. Stewardship Ontario welcomes information from industry representatives identifying new market research data.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Steward and/or Association	Paints and Coatings Available for Collection	Stewardship Ontario informed stewards that the new protocol for determining the 'amount available' will now be fixed as the previous year's 'actual' sales amount. Thus the sales data for 2011 will be used as the base for the 2013 costs. We understand that this new process is meant to allow more stability for stewards in planning future costs and this is something that all [we] support. In fact, anything that seeks to stabilize costs is of paramount importance to the sector in light of recent regulatory amendments in Ontario.	Comment noted.
Steward and/or Association	Paints & Coatings Reporting	At the August 23, 2012 Ontario MHSW updates session, Stewardship Ontario requested the input of paint and coatings stewards concerning the proposed addition of two new container size ranges. Currently the MHSW reporting portal for paints and coatings offers "> 5L" as the largest size container stewards can choose to complete their quarterly MHSW report. The program definitions limit the container size to 30 litres and less. The proposed new container size ranges replace the current "> 5 litres" by expanding it to ""> 5 litres to 14 litres" and "> 14 litres to 30 litres."	Comment noted.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>[We] support this initiative as an improvement from the current final range, which does not adequately represent the multitude of different paint and coatings containers that now are on offer in the Ontario marketplace. The larger sizes of containers will necessarily weigh less than smaller ones. Stewards selling paint and coatings products at the lower part of the current > 5 litre range are unfairly included, for MSHW fees purposes, with those stewards whose larger, heavier product containers should attract different charges. Allocating all paints and coatings containers larger than one US gallon to the same size category distorts the collection and recycling metrics of the program. The finer reporting range will allow for the differentiation of the various containers weights, and further, the differentiation of the environmental impact, recycling processes and collection data that these new containers represent to the MHSW program. In practice the new ranges will make possible separate analyses form the data collected from promotional 7 and 10 litre or US 2 gallon sizes and that collected form the standard US 5 gallon pail size. Most stewards already keep the various sizes</p>	

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		separate in their business results and thus there will be little extra effort required to reorganize their numbers for MHSW reporting. The new size ranges will allow for more accurate program results and increased efficiency as the reality of the 2012 marketplace and its expanded offerings to customers is taken into account.	
Steward and/or Association	Pesticides	The consultation document states the following <i>'While pesticides continue to be available, none are permitted for cosmetic purposes. Pest control products for use inside the home continue to be permitted for sale in the province, as are certain specified outdoor pesticides'</i> .The comment that <i>'none are permitted for cosmetic purposes'</i> is inaccurate, since there are still products legally available on the market to control pests such as, weeds in lawns, which is considered a 'cosmetic use' in Ontario. It would be more accurate to state that <i>'While pesticides continue to be available, only specific active ingredients, products and uses are permitted by the Government of Ontario.'</i>	The language has been modified as suggested.
Steward and/or	Pesticides and Fertilizers Available	We continue to ask for the lab pack analysis and other data for the Pesticide and Fertilizer categories	Lab pack audit data cannot be used to calculate the quantity available for collection since it

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Association	for Collection	in order to justify many of the assumptions and targets. For example, the assumption of 25% available for collection for the Pesticide Category presented in Appendix A seems high. [We] would like to obtain further detail as to how this assumption was developed.	<p>does not account for 100% of the waste stream. Lab pack audit data are used to determine material allocations where MHSW materials are commingled during collection and transportation.</p> <p>The Available for Collection factor for Pesticides is from the CMHSW Program Plan.</p>
Steward and/or Association	Pesticides and Fertilizers Reuse	Table 5.2 provides a comment with respect to Fertilizers and Pesticides that indicates that each of these categories will be subject to reuse or safe disposal. We applaud Stewardship Ontario's consideration of reuse as a viable option for both Pesticides and Fertilizers. [We] would like to understand how the decision between reuse and safe disposal will be made. At what point in the collection process will this differentiation be applied?	Municipalities can arrange for the reuse of collected Pesticides and Fertilizers in certain prescribed applications. The decision to direct to reuse or to transport to SO's processors is made by each municipality.
Steward and/or Association	Performance	Would SO be willing to release a high-level update of annual compliance and auditing activities? (Ex. Number of audits conducted)	Stewardship Ontario regularly reports compliance related activities to both our Board and Waste Diversion Ontario.
Steward and/or Association	Pesticides Collection Targets	We seek to understand the basis for the collection targets that have been established for the Pesticide	The Minister of the Environment directed Stewardship Ontario to incorporate the

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		category in Table 5.1	remaining collection targets from the CMHSW Program Plan. As such, targets for Years 3, 4 and 5 of the CMHSW Program Plan become targets for Years 1, 2, and 3 of the revised MHSW Program Plan. Years 4 and 5 targets are continuations of these targets, with a recognition that the growth in targets is likely to slow in the eighth and ninth years of the MHSW program.
Municipal Service Provider	Pressurized Containers	Given propane, Freon, helium and expanding foam are typically packaged in an acceptable pressurized container with the proper TC markings, has any consideration been given to including these common types of materials sold by retail stores and therefore generated by residential sources in the definition rather than requiring TC marking. The definition could be expanded to include specific types of waste that are sold and disposed of as pressurized cylinders. This would make it simpler as any propane, Feon, helium or expanding foam would be considered Phase 1 material. The condition of TC codes complicates the segregation of materials and acceptance at the depots/events where it is difficult to confirm the TC code immediately. If a material	In the case of pressurized containers, it is the containers themselves that are the designated MHSW material, not the contents. The definition of pressurized containers therefore uses markings on the pressurized containers without reference to contents. Stewardship Ontario will review its guidance documents for collectors to identify opportunities for further clarification.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>with incorrect TC code is inadvertently accepted, the municipality is responsible for cost. We understand there may be issues with imports from United States and therefore requirement of TC codes, however other Phase 1 materials are accepted by the type of material and not necessarily based on package code type.</p>	
Steward and/or Association	Pressurized Containers	<p>Refillable Compressed Gas Cylinders should be exempt from the revised MHSW plan reporting and stewardship fees requirements, for these reasons:</p> <p>These cylinders are included in [our]"life cycle management" Program that involves inspection of all returned cylinders, repainting them if necessary, and testing them at last once every ten years. If any of these cylinders is damaged or if it failed the integrity test, the valve is then removed, and the threads are damaged, so it cannot be re-used, and the cylinder is sent to a "scrap dealer" for proper disposal and for reclaiming the steel. As such many cylinders are re-used for more than 50 years and may be refilled and re-used more than 100 times in their life cycle, before they are scrapped. We believe including such cylinders in the MHSW</p>	<p>Your comments are appreciated. Stewardship Ontario will be reaching out to stewards of pressurized containers to discuss some key issues related to this material class.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>program is not fair and it defeats the purpose of our "life management cycle" program.</p> <p>The majority of compressed gas cylinders are owned by the gas company, and the end users rent these cylinders from [us] on a monthly basis. The majority of end users are, Industrial, Commercial, Large or Small IC&I accounts. Consumer end users are limited to the medical oxygen service, which represent a small fraction of our overall cylinder Business. Since the end users pay rental fees on these cylinders, it is in their best interest to return them to [us] for either getting a new cylinder, or closing the account, as to avoid the rental charges. [We] return these cylinders from customers, including small ICI accounts, free of charge.</p>	
Municipal Service Provider	Pressurized Containers	As detailed on page 6 of the DRAFT Program Plan, TC-39M is included under the Phase 1 program. This is the number/code found on most, if not all, expanding foam cylinders that the [we] have collected at our depots. The DRAFT Program Plan does not include any notes on special handling requirements for this material (ie. Removal of nozzle and/or removal of expanded foam on outside of	Comment noted. This is an operational matter and has been raised with our Operations team.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>cylinder prior to pick up). Currently Clean Harbours, as the Stewardship Ontario service provider for cylinder management, is demanding special pre-collection handling of these cylinders (ie. Removal of nozzle and/or removal of expanded foam on outside of cylinder and/or release of remaining foam from cylinder to ensure it is empty). [Our depots are prohibited from releasing hazardous material to the environment as per our Certificates of Approval and as such have not performed the service demands of Clean Harbours for expanding foam cylinders. This has resulted in Clean Harbours refusing to pick up these cylinders and stockpiling of these cylinders at Region depots. The Region has recently requested the service of Hotz to remove these cylinders to ensure adequate space for collection of new materials. The DRAFT Program Plan does not speak to this on-going issue or how it will be resolved through Stewardship Ontario to ensure that Municipalities abide by their MOE Certificates of Approval while continuing to provide optimal service levels to Ontario residents.</p>	
Private Sector Service Provider and/or	Program Agreement	It appears the many important details have been moved from the Program Plan to the Program	Details have not been relocated from the program plan to the program agreement. The program plan is a strategic document and does

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Association		Agreement. Many of these details will impact the success of the Program and stakeholders should have the opportunity to comment on. We would advocate that SO and WDO engage stakeholders in the development of this Program Agreement before it is posted on the Environmental Bill of Rights as there little opportunity for change after this point.	not include operational details of the program because it is designed to provide Stewardship Ontario's approach, guiding principles and methodologies.
Private Sector Service Provider and/or Association	Program Costs	It is stated that P&E and R&D costs, once set in an approved budget, can be controlled by Stewardship Ontario. Are the approved costs project specific and recipient specific? If so transparency would suggest that disclosure be made if there are changes to the dispersion of funds.	P&E and R&D activities are implemented by Stewardship Ontario staff. Staff spend the amount available in the approved budget. Stewardship Ontario's annual report describes the activities implemented in the previous year in relation to the budget for that year.
Steward and/or Association	Program Costs	[We] take issue with Stewardship Ontario's practice of proposing such broad changes to the Ontario MHSW program, while refusing to provide to the steward community the projected cost increase that will very likely result with the implementation of such plans. While [we have] no official standing with respect to Stewardship Ontario's practices, our common shareholders regularly raise these issues for a reasonable and transparent response for which [we] often have no answer. Comprehensive input by	An annual budget is presented to Stewardship Ontario's board of directors along with the annual operating plan. The board of directors has a responsibility to provide appropriate oversight to Stewardship Ontario. It also has a duty to ensure that the organization is sufficiently resourced to meet its legal obligations cost-effectively. In keeping with reporting transparency best

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		stewards cannot be effectively rendered without such vital information. As you well know, it is the steward community that will be responsible for funding these new initiatives. As such they must have a right to know the cost implications for their business operations in Ontario related to the implementation of changes made to the draft MHSW plan as announced on August 12, 2012.	practices, the MHSW Quarterly Performance to Budget Report is available to stewards when they log into the WeRecycle Portal. The report sets out the estimated budget and performance to date for MHSW common costs and for costs specific to each material category. The 2013 Budget will also be published on the WeRecycle Portal.
Steward and/or Association	Program Costs	[We have] questions around how Program costs are allocated to each of the MHSW materials. These questions again arise given the data integrity issues including the lab pack audit questions that remain unresolved.	Section 4 of the Program Plan describes the principles utilized to allocate program costs to MHSW materials. Most of the lab pack audits have been completed. The data are being reviewed and updated material allocations for commingled materials will be developed. The allocations will be posted on Stewardship Ontario's website together with the audit methodology used to compile the data.
Municipal Service Provider	Program Performance	The tables provided should show the weight of materials not the percentages.	The collection and performance targets are percentage targets. The weight of materials to be collected and recycled is calculated by applying the percentage to the weight of the

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			waste material available for collection. The weight of the waste material available for collection is calculated each year using data reported by stewards the previous year. Therefore, it is not possible during plan development to calculate the weight of materials to be collected and recycled for each of the next five years.
ENGO	Phase 2 and 3 Materials	A core problem with this plan is that it only applies to the nine Phase 1 MHSW materials, so while the focus is on the stewards and the recyclers, this creates a fundamental problem for municipalities and the public who have to differentiate and understand why some hazardous materials go to one place, and why some don't. To have a real impact on the environment, and for the program to be effective, the Province needs a cohesive and consistent program for all residents in all places.	Comment noted. As of October 1, Stewardship Ontario is no longer involved in managing Phase 2 or Phase 3 MHSW. Any future action related to Phase 2 or 3 MHSW resides with the Minister.
Steward and/or Association	Phase 2 and 3 Materials	Erstwhile Phase 1, 2 and 3 MHSW will soon be defunct. The new 9-material MHSW program will be managed by Ontario IFO, Stewardship Ontario (SO). We expect SO to clearly and in detail publish the new MHSW impact statement for the stewards and the consumers on what to expect for Phase 2, Phase	As of October 1, Stewardship Ontario is no longer responsible for Phase 2 or Phase 3 MHSW. Any future action related to Phase 2 or 3 MHSW resides with the Minister.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		3 and Irritants after October 1, 2012. We posed the question on Aug 23 in-person meeting and reiterate the question again. We understand that a NGO will be provided with MOE funding to manage Phase 2, for a period of three years. It will be up to that NGO to divide fixed funding amongst the materials and the municipalities. These will not be EPR programs, unless the Minister writes a regulation, as has been proposed for pharmaceuticals.	
Steward and/or Association	Phase 2 & 3 Materials	Concurrently with development of the new Phase 1 Program Plan: Our members request that SO, WDO and MOE publish a definitive statement for all stakeholders as to what is happening to Phase 2 and 3 as of October 1, 2012.	As of October 1, Stewardship Ontario is no longer involved in managing Phase 2 or Phase 3 MHSW. Any future action related to Phase 2 or 3 MHSW resides with the Minister
Steward and/or Association	Phase 3 Materials	Phase 3 materials are not yet conclusively and definitively eradicated. We understand that there is neither MOE funding nor EPR plans currently envisioned for Phase 3 materials. The situation in the interim will be as it was before 2008, with municipalities on their own to manage whatever consumers bring back. This can be potentially confusing and financially burdensome for stewards. Through SO, we request WDO to formally exclude	As of October 1, Stewardship Ontario is no longer involved in managing Phase 2 or Phase 3 MHSW. Any future action related to Phase 2 or 3 MHSW resides with the Minister

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>irritants from the definition of hazardous waste under Ontario Regulation 542/06, ideally concurrent with the other October 1, 2012, changes, to the effect of: <i>Irritant products, as defined under Canada's Consumer Chemicals and Containers Regulations (CCCR, 2001) do not meet the definition of hazardous or special waste under Ontario Regulation 542/06 and, therefore, are formally recognized as excluded from Phase 3 materials and all MHSW Programs.</i></p>	
ENGO	Program Scope	<p>A core problem with this plan is that it only applies to the nine Phase 1 MHSW materials, so while the focus is on the stewards and the recyclers, this creates a fundamental problem for municipalities and the public who have to differentiate and understand why some hazardous materials go to one place, and why some don't. To have a real impact on the environment, and for the program to be effective, the Province needs a cohesive and consistent program for all residents in all places.</p>	Comment noted.
Steward and/or Association	Promotion & Education	<p>While [we] acknowledge that raising awareness, changing behaviours and influencing attitudes with</p>	<p>Promotion and education campaigns are necessary to ensure generators are aware of</p>

Appendix B: Summary of Stakeholders' Comments Submitted Following Consultation Meeting to Review MHSW Program Plan

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>regard to MHSW materials are important for the program's success, we are extremely concerned about the extensive communications, promotion and education (P&E) as well as the research and development initiatives outlined in the Revised Program Plan. It is evident that this strategy comes with significant additional costs and great levels of uncertainty, thus making it outside the scope of what [we] believe is reasonable or even necessary. Moreover, stewards who are already in compliance and regularly paying fees for the responsible disposal of their products are already aware of the program's benefits and do not require further promotion and education efforts. For consumer facing products, it is appreciated that consumers need to be aware of the fact that a program exists and where drop-off locations for designated products are, however this would seem to be a one-time education initiative that should not require significant ongoing expenditure. Indeed [we] would argue that waste diversion fee visibility goes a long way to promoting consumer awareness of the programs.</p>	<p>recycling and safe disposal options and to facilitate behaviour change. Promotion and education tactics will be used to the extent necessary to ensure collection targets are being achieved and to ensure public awareness levels are/remain high.</p> <p>Similarly, research and development is required to ensure technologies are in place to achieve the recycling performance targets.</p> <p>There is a cost to these activities and Stewardship Ontario includes these anticipated costs in its annual budget, which is approved by its board of directors.</p> <p>In keeping with reporting transparency best practices, the MHSW Quarterly Performance to Budget Report is available to stewards when they log into the WeRecycle Portal. The report sets out the estimated budget and performance to date for MHSW common costs and for costs specific to each material category. The 2013 Budget will also be published on the WeRecycle Portal.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Private Sector Service Provider and/or Association	Promotion & Education	Kindly define what is an "Incentive Partner"	An incentive partner is an organization providing services to Stewardship Ontario in exchange for receiving an incentive payment. Examples of incentive partners include transporters and processors of automotive materials, batteries and certain materials collected by municipalities.
Steward and/or Association	Promotion & Education	Section 3.3 outlines the Communication, Promotion and Education Program, which Stewardship Ontario intends to pursue over the proposed plan's lifetime. While increased awareness and public engagement remain an important element of a successful MHSW program, based on Stewardship Ontario's document fully 95% of the public is already aware of the program's tenets, practices and goals. We therefore ask again if a cost-benefit review has been done of the increased P and E outreach plans (P&E tool kit, interactive website, additional awareness campaigns, driving behavior changes, school presentation etc.) against the increased program costs? We are hopeful that Stewardship Ontario is willing to share such a review with the stewards it represents.	<p>Promotion and education campaigns are necessary to ensure generators are aware of recycling and safe disposal options and to facilitate behaviour change. Promotion and education tactics will be used to the extent necessary to ensure collection targets are being achieved and to ensure public awareness levels are/remain high. While 95% of the public claimed some level of awareness of items that constitute hazardous or special waste, participation rates indicate that such knowledge has not translated into action.</p> <p>Many of the activities listed are being conducted already and those that have been successful will be repeated.</p> <p>There is a cost to these activities and</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			<p>Stewardship Ontario includes these anticipated costs in its annual budget, which is approved by its board of directors.</p> <p>In keeping with reporting transparency best practices, the MHSW Quarterly Performance to Budget Report is available to stewards when they log into the WeRecycle Portal. The report sets out the estimated budget and performance to date for MHSW common costs and for costs specific to each material category. The 2013 Budget will also be published on the WeRecycle Portal.</p> <p>Results of research studies to measure awareness levels among Generators of MHSW Materials and their options for managing the waste through Stewardship Ontario's collection network will be summarized in Stewardship Ontario's annual report</p>
Municipal Service Provider	Promotion & Education	With respect to the Communication, Promotion and Education information presented on pages 13 and 14, [we have] concerns with the lack of consistency in public education with the transition of the Orange	Comment noted.

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>Drop from all MHSW materials to only the nine Phase 1 materials. We understand that the Stewardship Ontario receives money from Stewards of Phase 1 materials to fund the Orange Drop program but with respect to education of residents, they do not understand which phase their hazardous materials belong. A centralized place is the most effective means for residents to find information for all MHSW information. [We] strongly support and recommend clear and concise promotion and education to Ontario residents to provide seamless program delivery and to ensure that hazardous materials are not released into the natural environment. When programs get too complicated, residents get frustrated and with that the risk of material mismanagement has the potential to increase as well. It is imperative that all organizations, including Stewardship Ontario, Waste Diversion Ontario, Recycling Council of Ontario, Ministry of the Environment and municipalities, participate in consistent promotion and education of proper management of hazardous materials regardless of which stewards provide funding.</p>	
Steward and/or	Promotion &	Insufficient data has been provided to support	The specific promotion and education tactics

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Association	Education	Promotion and Education plans. The costs for new P&E targets were not presented and new targets need to be supported by cost benefit analysis.	<p>will be developed each year in response to then-current needs and included in the annual operating plan and budget when submitted to Stewardship Ontario board of directors for approval.</p> <p>There are no specific promotion and education targets. Rather, these activities support the achievement of collection and recycling targets.</p>
Municipal Service Provider	Promotion & Education	<p>Another area where the program should be promoted is on the product labelling. Consumers would know right away they were purchasing an item that would require future management.</p> <p>Further partnerships with local municipalities to promote the program. Municipalities already do a lot of promotional activities.</p>	Comment noted.
Steward and/or Association	Promotion & Education	Please ensure that your website is revised to remove all references to Phase 2 and Phase 3 materials.	Work is underway and will be complete by October 1, 2012 which is the date on which the Phase 2/3 transition becomes effective.
Steward and/or Association	Promotion & Education	Insufficient data has been provided to support Promotion and Education (P&E) plans. As with accessibility targets, the costs for new P&E targets	The specific promotion and education tactics will be developed each year in response to then-current needs and included in the annual

Appendix B: Summary of Stakeholders' Comments Submitted Following Consultation Meeting to Review MHSW Program Plan

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>were not presented; and new targets need to be supported by cost benefit analysis. There was a question raised during the consultation webinar about diminishing returns, and our members share that question; as no sustainable business would “chase the last consumer” at any cost; and neither should Stewardship Ontario. In addition to unknown costs, there are many questions about the benefits of such P&E. A comment was also made by SO that categories will be managed using the 3Rs hierarchy. Our members are interested in learning what specific activities will support this. For example, the Consultation document discusses supporting 3Rs and BUD (the buy what you need and use it up principle) through P&E. Other questions include: Does SO intend to augment current BUD efforts (which to date seem to be minimal) and if so, at what cost? Has SO considered industry initiatives that can be leveraged in order to save costs as opposed to developing novel P&E? Will the P&E be specific to each category, or to groups of categories, or will it be generic, the benefit of which is questionable? Does the P&E budget include message development for use by the municipalities?</p>	<p>operating plan and budget when submitted to the Stewardship Ontario board of directors for approval.</p> <p>There are no specific targets for promotion and education. These activities support the achievement of collection and recycling targets.</p> <p>Promotion and education campaigns are necessary to ensure generators are aware of recycling and safe disposal options and to facilitate behaviour change. Promotion and education tactics will be used to the extent necessary to ensure collection targets are being achieved and to ensure public awareness levels are/remain high. 3Rs and BUD messaging will be incorporated where appropriate considering the communication message and tactic.</p> <p>Stewardship Ontario welcomes suggestions from industry to leverage existing initiatives or to work cooperatively to develop new cost effective communication channels.</p> <p>Promotion and education may be material specific or common to the program depending</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		Does the P&E budget include ensuring the website is revised to remove all references to Phase 2 and Phase 3 materials?	<p>on the identified needs. In some cases, communications may relate to a subset of MHSW materials only, such as automotive MHSW.</p> <p>Work is underway to remove all references to Phase 2/3 materials on the website. This work will be complete by October 1, 2012 which is date on which the Phase 2/3 transition is effective.</p>
Steward and/or Association	Promotion & Education	Regrettably the revised plan does not provide for detail on the P&E plans, nor does it appear to involve industry stewards or their associations for input. While SO has many good ideas, there is a demonstrated reluctance to engage industry so that P&E plans can correctly identify Phase 1 products and so that these plans can be harmonized with industry run initiatives. Such involvement would help reduce confusion on the part of the municipality and ultimately by the consumer, as well as improve the efficiency of the program.	<p>The specific promotion and education tactics will be developed each year in response to then-current needs and included in the annual operating plan and budget when submitted to the Stewardship Ontario board of directors for approval.</p> <p>Stewardship Ontario welcomes suggestions from industry to leverage existing initiatives or to work cooperatively to develop new cost effective communication channels.</p>
Municipal	Promotion &	The strategy aims to continue to promote the	Thank you for your suggestion. We will be

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Service Provider	Education	<p>MHSW Program through the Orange Drop program brand and website for the nine MHSW materials. [We] support the promotion of the MHSW Program through the Orange Drop brand however; we would like Stewardship Ontario to consider changes in the delivery of the information and location look up tool to ensure information posted on the website is accurate and up-to-date. The current search tool to find depot locations is based on postal code and as a result provides inaccurate information. In our experience the postal code search has directed residents to the closest depot location or other depots located outside our area even though they may not accept the material based on restrictions such as Certificate of Approval requirements. Currently, a resident with a postal code outside of [a particular service zone] is directed to [a certain] depot even though these residents are restricted from taking material to this depot. Residents typically do not click to read the site requirements even though it is recommended on the website. We want to ensure Stewardship Ontario has the ability to make necessary adjustments to the search tool to provide more accurate information and there is a</p>	<p>updating the postal code search function as part of a planned website refresh.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		process to confirm when requested changes are complete.	
Steward and/or Association	Regulation 11/12	As it has been mentioned by many in the meeting, the business world is a different world. We are not government and we do not have government's authority. We cannot go back to our customers after 3 or 6 months and tell them we have to pay so much more to Stewardship, please pay us. Specially big companies like ours have even less flexibility for this kind of maneuvers. We have one price list for all our products including oil and oil filter for all over Canada which is usually set at the beginning of the year and valid for the year. We are not a supermarket to change our prices every week. Slight differences could be absorbed but 30% increase is not a slight difference. We could very well lose our customers for this kind of fluctuations. If we lose our customers, you lose your revenues, too.	Regulation 11/12 requires Stewardship Ontario to recover historical material deficits as well as ongoing MHSW operating costs on a steward share basis rather than a unit/volume fee rate basis. Ontario businesses obligated by the MHSW program must determine if and how they wish to pass stewardship costs through their supply chain to consumers.
Steward and/or Association	Regulation 11/12	The new methodology has not only resulted in the fluctuation of invoice costs from one quarter to another – making business planning difficult – but has also increased the quantum of the fees that some of our members are now being asked to pay	Regulation 11/12 requires Stewardship Ontario to recover historical material deficits as well as ongoing MHSW operating costs on a steward share basis rather than a unit/volume fee rate basis. Ontario businesses obligated by the

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>on their latest invoices. The new funding methodology has had no effect other than to remove transparency to the stewards themselves and hamper their business planning and activities. It is for these reasons that the method of billing stewards on the basis of a transparently set fee per product is the preferred solution to the new method of allocating program expenses on a market-share basis, albeit with the understanding that fees may need to be adjusted annually in order to reach fiscal balance. Businesses have already invested and set up their practices for a set-fee approach so a return to such a system would be ideal.</p>	<p>MHSW program must determine if and how they wish to pass stewardship costs through their supply chain to consumers.</p> <p>Stewards have access to two pieces of information that can assist in estimating future program costs. The first is your Quarterly Recovery report identifying your quarterly expense and the second is the calculator available via the WeRecycleportal. The calculator presents the annual budget by material category and allows you to estimate your likely share of this annual expense. Annual budgets in the calculator will be updated when approved by the Stewardship Ontario board.</p>
Steward and/or Association	Regulation 11/12	<p>With respect to the issue of deficit recovery, [we] believe that the provisions under section 4 of Ontario Regulation 11/12 which retroactively recovers fees are not enforceable against the stewards under the MHSW program.</p>	<p>Stewardship Ontario is subject to Regulation 11/12. MOE presumably implemented this regulation on the advice of their legal counsel. You may wish to speak directly with the MOE.</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Steward and/or Association	Regulation 11/12	In general as an industry-funded organization, a scheme that increases both the complexity and quantity of fees requires a more effective dialogue with its stakeholder stewards to ensure a truly workable solution is implemented. We understand that the revised MHSW Program Plan is to be finalized and presented to the Stewardship Ontario Board and consequently Waste Diversion Ontario by the end of September 2012. [We] encourage both groups to re-visit the concept of a set-fee methodology which can be adjusted over time to accurately offset the total costs of the program going forward.	Comment noted.
Steward and/or Association	Regulation 11/12 Non Compliant stewards	What procedures and documents are in place for Stewards to report customers who do not comply with the deficit payments to the Stewards so that Stewardship Ontario can directly pursue the customers for the outstanding deficit amounts	A complete list of registered stewards is available on the WeRecycle portal. At stewards' request, this list will be reconfigured to present stewards registered with Stewardship Ontario by material class. An announcement will be distributed when this list is available.
Steward and/or	Regulation 11/12	Stewardship Ontario needs to provide a notification	In accordance with Ontario Regulation 11/12,

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Association	Deficit payments	announcement of the effective date that Stewardship Ontario will no longer issue future deficit charges and operate within the fee rates Stewardship Ontario has determined. So that customers can be advised that deficits are not going to be a continuing issue in the future.	Stewardship Ontario is issuing material deficit invoices (twelve quarterly payments amortized over the next three years). Each steward's share of each material deficit has been calculated as a proportion of the total quantities reported to Stewardship Ontario by material from July 2008 to December 2011. Payment of the first deficit invoice was due May 31, 2012. Stewards can also review their Deficit Detail Report on the WeRecycle portal . Notification of the deficit recovery process was sent out stewards in April 2012. A copy of that notice is available here .
Steward and/or Association	Regulation 11/12 Voluntary Remitter Agreements	<p>The Remitters agreement was originally instituted to allow companies to monitor and submit their Stewardship Ontario reports and fees directly. With the termination of this reporting arrangement the reporting must be done by the Steward and fees charged accordingly to the previous remitter.</p> <p>To institute this process equitably to all Ontario customers Stewardship Ontario needs to advise</p>	Please refer to the notice to stewards on the status of voluntary remitter agreements available here . Organizations can continue to voluntarily report for stewards using the existing agreement. However, Reg. 11/12 requires that Stewardship Ontario issue the invoice only to the obligated steward. (Note: Stewardship Ontario is also currently finalizing a new Voluntary Reporter Agreement to be made available to organizations wanting to

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<ol style="list-style-type: none"> 1. Since Stewardship Ontario now expects the Stewards to charge the customers and submit the fees for all customers whether they were previously Remitters (or continue to be Remitters) how is the Steward to determine what products remain in Ontario and are subject to the Ontario Stewardship charges especially if the previous Remitter never did submit and does not submit the data to the Steward? 2. What procedures and documents are now required to provide each customer for them to properly report what products ended up destined in Ontario to the Steward. 3. What procedures and documents are now required to allow customers to recover any charges paid for products that originally ended in Ontario and subsequently were further shipped to another province or country. 	<p>enter into a new reporting agreement with stewards.)</p> <p>Questions 1 and 2: For stewards needing to calculate Ontario sales, Stewardship Ontario is developing guidelines for each material class to assist stewards when preparing their reports.</p> <p>Question 3: Stewards are only to report quantities supplied into the Ontario market. Should a prior period report require correction, please refer to the Rules for Stewards for instructions on submitting corrections.</p>
Steward and/or	Regulation 11/12	The way Stewardship Ontario is now calculating the amount owing on products sold is nothing but a	On February 9, 2012 the Minister of Environment filed Regulation 11/12 as an

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
Association	SSA	Blank Cheque that Steward's are held ransom to. Stewardship Ontario puts in their newsletter that they want to be transparent and open, well then set the rates at whatever they have to be and all Stewards can charge the same and submit the same. The rates would be posted on Stewardship Ontario's website for any consumer to see. Stewardship Ontario seems to want to keep this out of the public's eye which is NOT being Transparent and Open! The way this program is set up now with Stewardship Ontario holding a Blank Cheque ever Month, They will soon get rid of the small business's out there. Is Stewardship Ontario's agenda to get rid of Small Business's? Is Stewardship Ontario working for big business?	<p>amendment to Regulation 542/06, changing the manner in which Stewardship Ontario recovers the cost of managing the MHSW program from stewards. The Regulation effectively replaces the fee-setting methodology in the CMHSW Program Plan (which had allowed Stewardship Ontario to set unit/volume fee rates) with a steward share methodology to recover ongoing operating costs and any deficits that had accumulated over the course of the program. On a go forward basis, Regulation 11/12 prevents deficits and surpluses from occurring.</p> <p>To achieve transparency, Stewardship Ontario publishes a quarterly cost and performance report in the WeRecycle portal so that stewards are aware of the program's performance when they receive their quarterly invoice.</p>
Steward and/or Association	Regulation 11/12 True up	A key issue SO has acknowledged is the need for a yearend true-up on fees paid by stewards. However, it has never been addressed when the true-up will be performed and how the overpayment will be refunded or credited. Consider that a steward might	Costs to stewards are likely to fluctuate quarter to quarter based on the seasonality of delivery of MHSW to collection sites and variations in stewards' sales cycles. These cycles could result in stewards' shares, which are calculated

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		<p>significantly overpay in Q1 of say 2013. If the true-up is not completed and refunded until say the end of Q2 the following year (2014), then the penalized steward will have overpaid two years running (in Q1 of both 2013 and 2014) before any refund is issued. Secondly, it has not been confirmed by SO that a refund will even be issued. If only a credit is issued, the steward will wait a full 2 years before the inequity is remedied by drawing down the accumulated credit at the end of Q1 2015.</p> <p>Whether or not this situation will happen frequently or on occasion, the inequity to stewards arises out of the potential for it to occur and it that potential which needs addressing before going forward.</p>	<p>quarterly, being disproportionately high for some stewards and disproportionately low for others. To address this issue, the revised Rules for Stewards contain a provision that allows Stewardship Ontario to perform an annual true-up of steward accounts. The true-up will ensure that the quarterly stewards share assessment will be substantially equal to the steward share assessment calculated in total over the preceding four quarters. (See Rules Section 3.2(4)). The true-up will be implemented after four quarters have been completed under Regulation 11/12 (i.e. summer/fall of 2013).</p> <p>Should the true-up result in a credit, a steward is able to apply that credit to their account immediately. If, for example, the annual true up calculated a \$50 credit for the steward and the steward has a quarterly deficit invoice due of \$100, and a quarterly cost recovery invoice due of \$200, the payment remitted would be $\{\\$100 + \\$200 - \\$50\} = \\250.</p>
Private Sector Service Provider	Research and Development	In order to ensure transparency, the acceptable parameters for eligible R&D funding should be fully	Section 3.4 sets out the principles utilized by Stewardship Ontario when considering R&D

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
and/or Association		established.	investments. Where Stewardship Ontario has made R&D investments in the past, it has used requests for expressions of interest, request for qualifications and requests for proposals that set out the parameters for the specific R&D initiative.
Private Sector Service Provider and/or Association	Research and Development	In order to ensure transparency, the award of R&D funds be fully disclosed and made public with regards to the recipient and the nature of the R&D to be undertaken	Where Stewardship Ontario has made R&D investments in the past, it has used requests for expressions of interest, request for qualifications and requests for proposals that set out the parameters for the specific R&D initiative. The selected recipients to receive R&D funds and the services provided have been announced.
Steward and/or Association	Research and Development	Could SO clarify whether any materials have been identified as requiring R&D at this point?	No R&D initiatives are currently identified.
Private Sector Service Provider and/or Association	Research and Development	The Program Plan should ensure businesses are not given unfair advantages. In this regard, an additional bullet should be added to the section on research and development that prohibits investments in research and development that cause unfair market advantage. We remain concerned by the implications of SO's announcement in December 2011 that they have begun to take equity positions	Stewardship Ontario seeks to affect the market in a fair manner. Section 3.4 has been revised to reflect this objective.

Appendix B: Summary of Stakeholders' Comments Submitted Following Consultation Meeting to Review MHSW Program Plan

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
		in recycling technologies and the implications that will have on the marketplace, now and in the future.	
Private Sector Service Provider and/or Association	Reporting Performance	The Program Plan provides very little detail on reporting performance metrics. This has been an area of concern in the past as there is little consistency in data submitted from year to year and between different programs. This information is important in evaluating the effectiveness, efficiency and overall health of these programs. As the Program Agreement has not been included in the consultation material, it is unclear if this is outlined in greater detail anywhere.	It is expected that the MHSW program agreement will describe the information that WDO currently requires in quarterly reports submitted by Stewardship Ontario.
Steward and/or Association	Steward Involvement in Budget Development, with focus on P&E and R&D	Another area is the lack of steward involvement in the annual planning/budgeting cycle. There is no opportunity to review annual plans at the material specific level or to consider the common promotion and education and R&D plans. SO has moved to provide performance reports to stewards but there is no process to involve stewards in the development of the annual budget. This should be covered as part of the governance provision of the plan which has not been provided for comment at this time.	<p>A detailed annual budget is prepared and presented to Stewardship Ontario's board of directors along with the annual operating plan. The board of directors approves the budget in its role as elected and appointed representatives of the steward community.</p> <p>In keeping with reporting transparency best practices, the MHSW Quarterly Performance to Budget Report is available to stewards when they log into the WeRecycle Portal. The report sets out the estimated budget and performance to date for MHSW common costs</p>

**Appendix B: Summary of Stakeholders' Comments Submitted
Following Consultation Meeting to Review MHSW Program Plan**

Stakeholder Group	Program Plan Design Component	Question/Comment	Stewardship Ontario Response
			and for costs specific to each material category. The 2013 Budget will also be published on the WeRecycle Portal.