

**Summary of Comments from Stewardship Ontario BBPP Funding Formula Review Feb. 14 Public Consultation  
Feb 14 to March 14, 2006**

| <b><u>Steward</u></b> | <b><u>Category</u></b> | <b><u>Comments (Summarized and/or Paraphrased)</u></b>  |
|-----------------------|------------------------|---|
| Adidas Canada Limited | Shift High to Low      | Support the recommendation  |
| Adidas Canada Limited | Like with Like         | Agree with the principle.   |
| Adidas Canada Limited | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Adidas Canada Limited | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Adidas Canada Limited | Paper Agg              | Support proposed aggregation of printed paper.  |
| Adidas Canada Limited | Timing                 | The changes to the weightings should be made in 2007.   |
| Adidas Canada Limited | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| AMO                   | Shift High to Low      | Shifting payment of higher fees to those materials having low recovery rates and low markets is a positive and fair step to having these materials start to represent their market value. Provide incentive to develop markets and better products  |
| Applebee's            | Deminimis              | Suggest a process so companies who must report but do not have to pay receive an exemption.   |
| Belwith Canada        | Shift High to Low      | Support the recommendation  |
| Belwith Canada        | Like with Like         | Agree with the principle.   |
| Belwith Canada        | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Belwith Canada        | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Belwith Canada        | Paper Agg              | Support proposed aggregation of printed paper.  |
| Belwith Canada        | Timing                 | The changes to the weightings should be made in 2007.   |
| Belwith Canada        | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Carleton University   | Shift High to Low      | Support the recommendation  |
| Carleton University   | Like with Like         | Agree with the principle.   |
| Carleton University   | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Carleton University   | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Carleton University   | Paper Agg              | Support proposed aggregation of printed paper.  |
| Carleton University   | Timing                 | The changes to the weightings should be made in 2007.   |
| Carleton University   | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| CERB                  | Admin                  | Support recommendations for maintaining current admin costs.  |
| CERB                  | Biodegradability       | Considerations of life cycle should be dropped as program is about recycling costs  |
| CERB                  | Deminimis              | De minimis should be eliminated   |
| CERB                  | Generation             | Support recommendations for continuing to use municipal waste audits and cross checking with steward reports.   |
| CERB                  | Other                  | Supporting documentation needs to be provided to all stewards to justify the dramatic increase in the aluminum fee credit outlined in the proposed funding formula. Also, bigger issues not being addressed: actual diversion, quality of blue box feedstock; need for a truly sustainable approach |
| CERB                  | Recycled Content       | Should be evaluated with caution - potential to create un-level playing fields  |

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| CERB                          | Revenue                | Support recommendations for retaining the 3-year rolling average on material revenues.   |
| CERB                          | Timing                 | Not prudent to make decisions on funding principles for 2007, based on 2004 data, especially when it is our understanding that the 2005 municipal audits have been completed. 2005 data understood to be more accurate. Decisions on 2007 fees should be based on latest data, recognizing that 2005 reports will be used to crosscheck this municipal data later in the year.   |
| CERB                          | Weightings             | Manipulation of weightings simply illustrates the inherent unfairness of a funding formula construct that flows directly from a flawed WDA   |
| CSFA                          | Plastics Dis-Agg       | Some materials are not conducive to recycling but are the best choice for the stated policy objective of landfill diversion as stated in the Act. It is unfair to target materials that lack viable markets.   |
| CSFA                          | Weightings             | Disagree with proposed weightings. Should transfer less than the current equalization or 50/50/0.  |
| CSFA                          | Equalization           | 60% is not a fair target as some materials are already there and others are at 0%.   |
| CSFA                          | Timing                 | Changes should be phased in over time. Steward reporting should be changed to use a one year lag, rather than a two year lag.  |
| COLGATE PALMOLIVE CANADA INC. | Shift High to Low      | Support the recommendation. But as an alternative, leave same as current   |
| COLGATE PALMOLIVE CANADA INC. | Like with Like         | Agree with the principle.  |
| COLGATE PALMOLIVE CANADA INC. | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| COLGATE PALMOLIVE CANADA INC. | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| COLGATE PALMOLIVE CANADA INC. | Paper Agg              | Support proposed aggregation of printed paper.   |
| COLGATE PALMOLIVE CANADA INC. | Timing                 | The changes to the weightings should be made in 2007.  |
| COLGATE PALMOLIVE CANADA INC. | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Costco                        | Other                  | Estimated fee increase is unacceptable   |
| CPIA                          | Plastics Dis-Agg       | Strongly oppose changes. Plastic stewards will be paying for 53% of total blue box costs, up from 43%, while only 10% of packaging that is recycled in plastic. Unacceptable fee for level of service provided (municipalities do not collect their material) and moves further from specific nexus including policy objectives. Higher fees will pressure stewards and suppliers on an already low margin for these products and drive business out of Ontario. |
| CPIA                          | Recycled Content       | Creates unlevel playing field - food processors disadvantaged because they are prohibited by law to use recycled content for food contact applications   |

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|------------------------------|------------------------|--|
| EPSC                         | Deminimis              | As there are 25,000+ companies under de minimis, clearly small number of companies is shouldering the environmental responsibility in Ontario.   |
| Euro-Pro Operating LLC       | Shift High to Low      | Support the recommendation. But as an alternative, transfer less than current.   |
| Euro-Pro Operating LLC       | Like with Like         | Agree with the principle.  |
| Euro-Pro Operating LLC       | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Euro-Pro Operating LLC       | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Euro-Pro Operating LLC       | Paper Agg              | Support proposed aggregation of printed paper.   |
| Euro-Pro Operating LLC       | Timing                 | The changes to the weightings should be made in 2007.  |
| Euro-Pro Operating LLC       | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Georgian College             | Shift High to Low      | Should not rewarding companies that use low recovery rate materials at the expense of those that are using high recovery rate materials.   |
| Georgian College             | Like with Like         | Agree with the principle.  |
| Georgian College             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Georgian College             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Georgian College             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Georgian College             | Timing                 | The changes to the weightings should be made in 2007.  |
| Georgian College             | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Hayes LLC                    | Plastics Dis-Agg       | Current approach is more accurate and simpler and fairer in implementation. Would place some material at a competitive disadvantage without a proven benefit. Would limit a steward's ability for material and thus could result in cost increase to both the steward and eventually consumer. Unless all materials are mandated to be in every blue box program the fair approach would be to continue to spread this cost amounting to a larger number of stewards. Dis-ag does not reflect the total cost of the program, and would not serve a beneficial purpose.             |
| Hayes LLC                    | Recycled Content       | Support opportunity for recycled content credit program with market development component of fee setting formula. Recycled content should be recognized. Should be allowed only for post consumer material since that is what drives recovery and allows collected material to be reused for high value end use. Credit for in-plant scrap metal would not be accepted toward credit, since material has always been used in the past. The threshold should be established for each category. Credits should be substantiated according to CEN standards and be subject to audits. |
| Hayes LLC                    | Timing                 | 2007 is a good time frame to implement changes   |
| Home Hardware Stores Limited | Shift High to Low      | Support the recommendation   |
| Home Hardware Stores Limited | Like with Like         | Agree with the principle.  |

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|------------------------------|------------------------|---|
| Home Hardware Stores Limited | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Home Hardware Stores Limited | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Home Hardware Stores Limited | Paper Agg              | Support proposed aggregation of printed paper.  |
| Home Hardware Stores Limited | Timing                 | The changes to the weightings should be made in 2007.   |
| Home Hardware Stores Limited | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Jempak GK Inc.               | Shift High to Low      | Support the recommendation. But as an alternative, leave same as current.   |
| Jempak GK Inc.               | Like with Like         | Agree with the principle.   |
| Jempak GK Inc.               | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Jempak GK Inc.               | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Jempak GK Inc.               | Timing                 | The changes to the weightings should be made in 2007.   |
| Madcatz (Mike Guerrero)      | Other                  | Make meetings later in day to accommodate people on the west coast.   |
| Manulife Financial           | Agg                    | Impossible to accurately calculate recovery rates if the categories were disaggregated. Advocate fully aggregated model.  |
| Manulife Financial           | Shift High to Low      | Support the recommendation  |
| Manulife Financial           | Like with Like         | Agree with the Fully Aggregated approach  |
| Manulife Financial           | Paper Agg              | Support proposed aggregation of printed paper if full aggregation is not possible.  |
| Manulife Financial           | Timing                 | The changes to the weightings should be made in 2007.   |
| Manulife Financial           | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Maple Leaf                   | Deminimis              | Revision to the de minimis level that would have smaller stewards contribute using a flat fee or a schedule   |
| Maple Leaf                   | Fairness               | Request for data that justifies a significant increase in the aluminum credit   |
| Maple Leaf                   | Shift High to Low      | Adjust to reduce favourable weighting given to materials with higher recovery rates.  |
| Maple Leaf                   | Other                  | Further consideration of lifecycle analysis   |
| Maple Leaf                   | Plastics Dis-Agg       | Do not support disaggregation of plastics. Dramatic move away from nexus because some organizations have legal limitations on what their packaging choices are.   |
| Maple Leaf                   | Plastics Dis-Agg       | Do not support disaggregation of plastics. Some products have legal limitations on what their packaging choices are and are not collected by municipalities. Option favours beverage containers.  |
| Maple Leaf                   | Timing                 | Changes should not be made in 2007 since a larger review of the Act is required. If this is not possible, a three-year phase-in is suggested. Data from most recent waste audits should be made available to stewards to allow them to evaluate changes to the funding formula. |
| Maple Leaf                   | Weightings             | Recommended weightings penalize low recovery materials twice  |

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|-----------------------|------------------------|---|
| Maple Lodge Farms     | Like with Like         | Get municipalities onside with collecting all materials covered by the Stewardship program first. Otherwise, how can a Steward stand a chance of winning at this game? Taxing them more is futile if the municipalities are not onside.   |
| Maple Lodge Farms     | Other                  | Use a deposit system for PET and HDPE containers  |
| Maple Lodge Farms     | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Maple Lodge Farms     | Shift High to Low      | In the case of plastics for example, PET and HDPE plastic is the most diverted type of material. In part, this is because most municipalities will not pick up plastic film, plastic laminates, polystyrene and other plastics. So no matter how much you tax these items that municipalities will not pick up through changing the fee structures, the opportunity to actually divert these types of materials is non-existent on the part of the parties being taxed. Therefore the likelihood of this process actually standing any real chance of success is nil. |
| Maple Lodge Farms     | Timing                 | The changes to the weightings should not be made in 2007. Changes of any kind should wait until some data is presented on the effectiveness or lack thereof of the current program. If the actual recovery rate is only 10% as some have suggested, the current program needs some radical rethinking, not just some fine tuning.   |
| Maple Lodge Farms     | Timing                 | The changes to the weightings should not be made in 2007. Before tampering with weightings there is a need to resolve the proposal of disaggregating of plastics first.   |
| Maple Lodge Farms     | Weightings             | Do not support the recommendation of 20/40/40/60 weightings. Come to grips with the realities of what is actually going into the BB before attempting to make any changes.  |
| Meadwestvaco          | Agg                    | Should continue with paper based packaging as aggregated. Unlike plastics, the presence of a small amount of laminants with boxboard and cardboard does not make a specific bale or load unusable.  |
| Meadwestvaco          | Paper Agg              | Support proposed aggregation of printed papers and plastics packaging   |
| Meadwestvaco          | Weightings             | Support the shift of more of the program cost to materials with lower recovery rates, the recommended weightings and making these changes in 2007   |
| NAPCOR                | Shift High to Low      | Support the recommendation  |
| NAPCOR                | Like with Like         | Agree with the principle.   |
| NAPCOR                | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| NAPCOR                | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| NAPCOR                | Paper Agg              | Support proposed aggregation of printed paper.  |
| NAPCOR                | Timing                 | The changes to the weightings should be made in 2007.   |
| NAPCOR                | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Neilson Dairy         | Shift High to Low      | This moves further away from the fee-for-service principle. Instead, efforts should be focused on increasing the recyclability of low recovery materials.   |

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|--|------------------------|---|
| Neilson Dairy                            | Paper Pack Agg         | Do not support the proposed aggregation of paper packaging. Paper packaging should remain as currently aggregated. Disaggregation, together with the shift in funding formula, assumes that Stewards can modify their packaging choices to packaging with better recovery or more recyclable materials. In the case of the food industry, packaging choices are limited by other factors.   |
| Neilson Dairy                            | Plastics Dis-Agg       | Do not support proposed aggregation of plastic packaging. Plastic packaging should remain as currently aggregated. Disaggregation, together with the shift in funding formula, assumes that stewards can modify their packaging choices to packaging with better recovery or more recyclable materials. In the case of the dairy industry, milk pouches represent the least possible packaging for delivering this good. Disaggregation will unfairly penalize our industry which provides a staple good in the minimum possible packaging. |
| Neilson Dairy                            | Timing                 | If the changes are made they should be phased in over a 3 year period to allow Stewards to adjust to the substantial increases resulting from dis-aggregation.  |
| Neilson Dairy                            | Weightings             | Do not support the recommendation of 20/40/40/60 weightings. Should keep the current weightings.  |
| Novelis Corporation                      | Shift High to Low      | Support the recommendation; Concern about leakage of aluminum from Blue Box which causes artificially lower recovery rate.  |
| Novelis Corporation                      | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Novelis Corporation                      | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Novelis Corporation                      | Paper Agg              | Support proposed aggregation of printed paper.  |
| Novelis Corporation                      | Timing                 | The changes to the weightings should be made in 2007.   |
| Novelis Corporation                      | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Ontario Community Newspapers Association | Shift High to Low      | Support the recommendation  |
| Ontario Community Newspapers Association | Like with Like         | Agree with the principle.   |
| Ontario Community Newspapers Association | Paper Agg              | Support proposed aggregation of printed paper.  |
| Ontario Community Newspapers Association | Timing                 | The changes to the weightings should be made in 2007.   |
| Ontario Community Newspapers Association | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Ontario Dairy Council                    | Dis-Agg                | Paper packaging should not be disaggregated. Significant fee hikes make stewards less competitive because of higher prices and places economic burdens on packaging suppliers. Similarly, plastic packaging should not be disaggregated as many of these materials have regulations controlling their options and are not collected by municipalities.  |

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|-----------------------|------------------------|---|
| Ontario Dairy Council | Shift High to Low      | Do not support the shift of more of the program cost to materials with lower recovery rates as packaging formats are often based on regulatory restrictions or health and safety reasons or municipalities do not collect these materials.  |
| Ontario Dairy Council | Timing                 | Changes should not be made in 2007 since a larger review of the Act is required. If this is not possible, a three-year phase-in is suggested.   |
| Ontario Dairy Council | Weightings             | Should keep the current weightings; should revise fee structure as part of review of the Act  |
| ORHMA CRFA            | Dis-agg                | Do not support disaggregation of plastics. The food services industry does not have many choices in the type of material that is used.  |
| ORHMA CRFA            | Paper Agg              | Support partial or, secondly, full aggregation of printed paper.  |
| PPEC                  | Dis-Agg                | Agree with approach for partial dis-agg   |
| PPEC                  | Like with Like         | Strongly agree with aggregating like materials  |
| PPEC                  | Other                  | More needs to be done on cost allocation studies.   |
| PPEC                  | Recycled Content       | SO is passing the buck to the material supply sectors, expecting them to lobby stewards into green procurement programs. Should come out of a market development fund supported by all stewards.  |
| PPEC                  | Revenue                | Agree with 3 year rolling average   |
| PPEC                  | Timing                 | Strongly recommend changes for 2007.  |
| PPEC                  | Weightings             | Support recommendations. Will reduce penalty to stewards using high recovery materials. Will reduce contribution of low cost tonnes. Will improve financial signals to encourage greater 3Rs. Will strengthen nexus. Will more closely mirror "fairness, effectiveness and sustainability". Would like even higher equalization factor.   |
| RCC                   | Equalization           | Reaching 60% diversion by 2008 is not feasible  |
| RCC                   | Other                  | Make funding formula more simple - too much of a burden on stewards to file.  |
| RCC                   | Plastics Dis-Agg       | This will not have huge affect on fees paid by retailers, but retailers will pick up most of the plastic tab. Dis-aggregating plastics will be an additional admin burden in calculating fees   |
| RCC                   | Timing                 | Time frame does not allow time to update unit based calculators, CBCs, to account for aggregated and disaggregated material.  |
| Refreshments Canada   | Dis-agg                | Continuing to lump materials into larger groupings regardless of disparities in costs/revenues and performance negates the influence of various factors within the funding formula  |
| Refreshments Canada   | Shift High to Low      | Support sharing of slightly greater portion of the program costs among materials with lower recovery rates. Important to ensure that stewards who have undertaken significant diversion efforts in the past are not being penalized for having higher recovery rates. Targeting "next least cost tonne" should not burden certain materials with high costs while allowing the remaining materials to benefit from the overall achievement of the system. |

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|---------------------------|------------------------|--|
| Refreshments Canada       | Plastics Dis-Agg       | PET and HDPE users have already contributed to market development, which can also be undertaken by the users of other plastics to improve their markets and hence lower their fees as their recovery rates increase.   |
| Refreshments Canada       | Timing                 | The changes to the weightings should be made in 2007.  |
| Refreshments Canada       | Weightings             | Agree with revised weightings (including 60% diversion target)   |
| Renfro, Fruit of the Loom | Shift High to Low      | Support the recommendation   |
| Renfro, Fruit of the Loom | Like with Like         | Agree with the principle.  |
| Renfro, Fruit of the Loom | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Renfro, Fruit of the Loom | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Renfro, Fruit of the Loom | Paper Agg              | Support proposed aggregation of printed paper.   |
| Renfro, Fruit of the Loom | Timing                 | The changes to the weightings should be made in 2007.  |
| Renfro, Fruit of the Loom | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Sonoco                    | Dis-Agg                | This would not work with paper or plastic. Even though they are recovered through a single stream, they are marketed differently. Not all paper and plastic are accepted so difficult to say they are 'like'. Current approach minimizes cross subsidization among various materials and works to maximize market development for high recycling material.   |
| Sonoco                    | Paper Agg              | Support aggregation of printed paper since it is sorted and marketed in similar fashion.   |
| Sonoco                    | Recycled Content       | Support recycled content recommendation, though credits should only be allowed on post consumer material and should meet CEN standards and be subject to audits.   |
| Sonoco                    | Timing                 | Changes should be made in 2007   |
| Sonoco                    | Weightings             | Support proposed weightings and equalization target as it creates a more level playing field.  |
| Tetra Pak Inc.            | Shift High to Low      | Support the recommendation   |
| Tetra Pak Inc.            | Like with Like         | Agree with the principle.  |
| Tetra Pak Inc.            | Paper Pack Agg         | Do not support the proposed aggregation of paper packaging. Fibre is fibre. Aseptic packaging, polycoat, and laminated board does not need to be separated from corrugated and boxboard because, unlike the case with different plastics, they can and in some cases are baled, shipped, and recycled together. Mixing them is possible without creating rejects; not so with plastics. Further, reducing unnecessary additional categories wherever possible makes reporting and compliance easier and less costly for stewards. We would propose the same for printed papers were it not for the unique in-kind arrangement that the CNA/OCNA has with WDO, which requires member products to be treated differently from non-member products. |
| Tetra Pak Inc.            | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Tetra Pak Inc.            | Paper Agg              | Support proposed aggregation of printed paper.   |
| Tetra Pak Inc.            | Timing                 | The changes to the weightings should be made in 2007.  |
| Tetra Pak Inc.            | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |



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|-------------------------------|------------------------|---|
| Unilever                      | Deminimis              | Strongly feel that the de minimis level should be changed, given that 25,000 companies are not paying and that certain stewards are required to effectively subsidize their competitors in the Ontario market.  |
| Unilever                      | Plastics Dis-Agg       | Support partial disaggregation of plastics. This should help to move manufacturers towards packaging that is more recyclable, has established markets, and costs less to manage through the recycling process.  |
| Varimpo Products              | Shift High to Low      | Support the recommendation. Alternatively, leave same as current  |
| Varimpo Products              | Like with Like         | Agree with the principle.   |
| Varimpo Products              | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Varimpo Products              | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.  |
| Varimpo Products              | Paper Agg              | Support proposed aggregation of printed paper.  |
| Varimpo Products              | Timing                 | The changes to the weightings should be made in 2007.   |
| Varimpo Products              | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |
| Wendy's Restaurants of Canada | Shift High to Low      | Where the recovery rate is directly related to whether or not the municipalities collect the material, this is penalizing stewards for something they have no control over.   |
| Wendy's Restaurants of Canada | Like with Like         | This is not realistic in the plastics category - most municipalities collect only bottles (no plastic laminants or polystyrene) therefore the recovery rate is very low. Aggregating this way means that users of the materials other than bottles are penalized for a low recovery rate which they have no control over.   |
| Wendy's Restaurants of Canada | Paper Pack Agg         | Support proposed aggregation of paper packaging.  |
| Wendy's Restaurants of Canada | Plastics Dis-Agg       | Do not support proposed aggregation of plastic packaging. Low recovery rate of "All other plastic" is directly related to the fact that the municipalities do not collect or recycle it. In principle, it is already wrong that fees are being collected from stewards & paid to municipalities for a service that does not exist - increasing that fee does nothing to move towards higher diversion of waste. Leave the fees as is & only pay out the "Other Plastics Allocation" to municipalities that recycle these materials so there is an incentive for the municipalities to recover more. |
| Wendy's Restaurants of Canada | Paper Agg              | Support proposed aggregation of printed paper.  |
| Wendy's Restaurants of Canada | Timing                 | The changes to the weightings should be made in 2007.   |
| Wendy's Restaurants of Canada | Weightings             | Support the recommendation of 20/40/40/60 weightings.   |

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**Steward**                      **Category**                      **Comments (Summarized and/or Paraphrased)**

**For the following responses, permission not given to release respondent's name and affiliation**

|           |                   |   |
|-----------|-------------------|---|
| Company A | Shift High to Low | Support the recommendation  |
| Company A | Like with Like    | Agree with the principle.   |
| Company A | Paper Pack Agg    | Support proposed aggregation of paper packaging.  |
| Company A | Plastics Dis-Agg  | Support proposed aggregation of plastic packaging.  |
| Company A | Paper Agg         | Support proposed aggregation of printed paper.  |
| Company A | Timing            | The changes to the weightings should be made in 2007.   |
| Company A | Weightings        | Support the recommendation of 20/40/40/60 weightings.   |
| Company A | Other             | While the mandate of the review was to deal with changes per the existing Act, there is a need to address fundamental changes to the Act itself. Stewardship Ontario is handcuffed to a great extent and some of the true issues relating to the support of the 3 R's are as a result not being addressed.  |
| Company B | Shift High to Low | Support the recommendation  |
| Company B | Like with Like    | Agree with the principle.   |
| Company B | Paper Pack Agg    | Support proposed aggregation of paper packaging.  |
| Company B | Plastics Dis-Agg  | Support proposed aggregation of plastic packaging.  |
| Company B | Paper Agg         | Support proposed aggregation of printed paper.  |
| Company C | Like with Like    | It is important that high value, easy-to-recycle materials aren't negatively impacted by less recyclable and less valuable materials.   |
| Company C | Timing            | If weightings are changed, the changes should be phased in.   |
| Company D | Biodegradability  | Support a program for use of CSB certified biodegradable material; for stewards who can't move to high recovery highly recyclable packaging options they can chose packaging in biodegradable form for landfill   |
| Company D | Deminimis         | Support elimination of de minimis; principal of equal accountability among all industry   |
| Company D | Like with Like    | In principal this sounds reasonable until the math is done and then the magnitude of the fee shift delivers significant increased financial responsibility for the cost of the program on food packaging stewards. This strays from the joint accountability principal.   |
| Company D | Paper Agg         | Support proposed aggregation of printed paper. This change has minor impact on our sector. Unlike food grade packaging, industries using paper products for printed material should be incented to move to recycled paper or use the most highly recyclable materials where health is not a risk.   |
| Company D | Paper Pack Agg    | Do not support the proposed aggregation of paper packaging. Because this is food grade packaging and because of the efforts in the industry to invest in capital equipment to reduce the impact on the environment eg: milk/beverages in gable top containers or aseptic as opposed to glass. It is not correct strategically to penalize these 5-10 year old investment decisions which were made for sound environmental reasons. |

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| <b><u>Steward</u></b> | <b><u>Category</u></b> | <b><u>Comments (Summarized and/or Paraphrased)</u></b>   |
|-----------------------|------------------------|--|
| Company D             | Plastics Dis-Agg       | Disagree as this places disproportionate cost on food industry who have made significant contributions in reducing amount of packaging used to the bare minimum protection levels, but can not reduce further due to safety regulations  |
| Company D             | Recycled Content       | Support implementation of rebates for recycled content in plastic and paper packaging; rewards brand owners for contributing to 3 Rs and provides end market for recycled materials  |
| Company D             | Shift High to Low      | This proposal although in principal sounds resonable, once the math is calculated the shift produces a high burden on the plastics and paper packaging brand owners. Transfers more of the program costs to non aluminum and HDPE brandowner or the food packaging industry as opposed to the beverage packaging industry. |
| Company D             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company D             | Weightings             | Support the recommendation of 60% target on equalization. It makes sense to tie the numbers to the Ministry of the Environment target.   |
| Company E             | Shift High to Low      | Support the recommendation   |
| Company E             | Like with Like         | Agree with the principle.  |
| Company E             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company E             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company E             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company E             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company E             | Weightings             | Support the recommendation of 20/40/40/60 weightings. If these weightings are not used, retain current as alternative.   |
| Company F             | Shift High to Low      | Support the recommendation   |
| Company F             | Like with Like         | Agree with the principle.  |
| Company F             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company F             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company F             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company F             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company F             | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Company G             | Shift High to Low      | Support the recommendation   |
| Company G             | Like with Like         | Agree with the principle.  |
| Company G             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company G             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company G             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company G             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company G             | Weightings             | Support the recommendation of 20/40/40/60 weightings. If these weightings are not used, retain current as alternative.   |

**Summary of Comments from Stewardship Ontario BBPP Funding Formula Review Feb. 14 Public Consultation  
Feb 14 to March 14, 2006**

| <b><u>Steward</u></b> | <b><u>Category</u></b> | <b><u>Comments (Summarized and/or Paraphrased)</u></b>   |
|-----------------------|------------------------|--|
| Company H             | Shift High to Low      | Support the recommendation   |
| Company H             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company H             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company H             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company H             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company H             | Weightings             | Support the recommendation of 20/40/40/60 weightings. If these weightings are not used, retain current as alternative.   |
| Company I             | Shift High to Low      | Support the recommendation   |
| Company I             | Like with Like         | Agree with the principle.  |
| Company I             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company I             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company I             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company I             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company I             | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Company J             | Shift High to Low      | In principle this is a good idea, but cannot support changes that would increase the cost of using packaging that optimizes the safety and reliability of our food.  |
| Company J             | Like with Like         | Grouping of "like" materials is being excessively emphasized to the detriment of other considerations, such as the economic, public safety and other factors that will be affected by the fee setting exercise. This is especially true for the food industry, where public safety through increased traceability, protection of food from contamination and maintenance of freshness are extremely important.   |
| Company J             | Paper Pack Agg         | Do not support proposed aggregation of paper packaging. We believe that this raises the same types of concerns for other industry groups as we have with disaggregation of plastics.   |
| Company J             | Plastics Dis-Agg       | Disaggregation of PET bottles and HDPE penalizes the produce industry (and other food industry groups) mostly for the benefit of the beverage industry. Our industry has very limited options due food safety requirements, the perishability of our product and nature of consumer demand. Furthermore, this proposal will further disadvantage Ontario fruit and vegetable packers who ship into many export markets, causing a cascade of negative effects to growers, packers and associated industries. |
| Company J             | Paper Agg              | Support proposed aggregation of printed paper. We see no compelling public safety or economic considerations that would be affected by this change.  |
| Company J             | Weightings             | Do not support the recommendation of 20/40/40/60 weightings.   |
| Company K             | Like with Like         | Agree with the principle.  |
| Company K             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company K             | Plastics Dis-Agg       | Do not support proposed aggregation of plastic packaging.  |
| Company K             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company K             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company K             | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |

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| <b><u>Steward</u></b> | <b><u>Category</u></b> | <b><u>Comments (Summarized and/or Paraphrased)</u></b>   |
|-----------------------|------------------------|--|
| Company L             | Shift High to Low      | Support the recommendation; should be left the same as current   |
| Company L             | Like with Like         | Agree with the principle.  |
| Company L             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company L             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company L             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company L             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company L             | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Company M             | Shift High to Low      | Support the recommendation. Alternatively, leave same as current   |
| Company M             | Like with Like         | Agree with the principle.  |
| Company M             | Paper Pack Agg         | Support proposed aggregation of paper packaging.   |
| Company M             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company M             | Paper Agg              | Support proposed aggregation of printed paper.   |
| Company M             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company M             | Weightings             | Support the recommendation of 20/40/40/60 weightings.  |
| Company N             | Plastics Dis-Agg       | Support proposed aggregation of plastic packaging.   |
| Company N             | Paper Agg              | While we understand the proposed model does include a provision to partly cover all paper types, the wide disparity in rates indicates this has not been achieved. If the desire is to treat like materials together, products that are collected in a similar fashion, have similar recovery rates and are combined to result in a final product, should be treated equally through one rate for all Printed Paper (including Newsprint). |
| Company N             | Timing                 | The changes to the weightings should be made in 2007.  |
| Company N             | Weightings             | As the proposal is only for a partial aggregation, and the "Other" paper category has the lowest recovery rate in the printed paper category, there should be a mechanism to transfer the extra cost for the equalization factor to that group rather than magazines and telephone directories.  |
| Company O             | Plastics Dis-Agg       | Strongly opposes the proposed disaggregation of plastics into the proposed PET, HDPE and All Other Plastics categories. The degree to which the lower recovery materials in the All Other Plastics categories would be required to subsidize high recovery material like PET and HDPE is inequitable.  |
| Company O             | De Minimis             | The de minimis exemption for the small business sector should be rescinded. Instead, a flat fee or a sliding scale should be implemented.  |
| Company O             | Revenue                | Support the maintenance of the 3-year rolling average applied to municipal revenues. This provides stewards with a degree of predictability by averaging the fluctuations in recycled material commodity pricing.  |