

Stewardship Ontario
Feedback received from Public Consultation Dec 8 - Feb 13

Category	Comments (Summarized and/or Paraphrased)
Admin	No reallocation
Admin	Maintain averaging of admin fees across stewards
Admin	Quantify admin costs to stewards
Admin	Do not use flat fee/unit for admin ... consider 50% # of stewards, 50% weight generated
Aggregate	Don't aggregate printed paper
Aggregate	Paper should be aggregated; no rationale exists to maintain dis-aggregation
Aggregate	Data are poor and more fair to spread costs across greater # stewards
Aggregate	Most municipalities manage material stream the same way & moving more to single stream
Aggregate	Unregistered mags increase costs
Aggregate	"Other printed paper" category is assessed a fee that is disproportionately higher relative to others
Aggregate	Total aggregation is simpler ... some categories at unjustifiably high levels
Biodegradability	Must comply with regulations, which is difficult to prove, thus currently a credit system is premature
Biodegradability	Should not be put forward: more leachate in landfills, problematic for feedstock, smaller particles have unknow impacts, not acceptable as litter, no additional benefit for composting, public opinion regarding benefits are misinformed
Biodegradable	Provide incentives for biodegradability once standards are defined
Biodegradable	Not a diversion option and should not be considered
Biodegradable	Don't consider at this time
Biodegradable	Unproven and not part of sphere of recycling
Biodegradable	Do not consider this option - not relevant to recycling
Biodegradable	Do not support
Common Costs	Should be based entirely on relative weight and volume generated
De minimis	Barrier to small businesses; administration costs of registration, collection and audits would be a net cost
De minimis	Support a flat fee or a schedule
De minimis	Impractical and financially disadvantageous to change the de minimis level, so long as it remains fair and reasonable
De minimis	Make small stewards pay flat fee or based on a schedule
De minimis	Eliminate de minimis and implement flat fee eg. \$100 or per calculator, calculate based on GAP analysis
De minimis	Rescind de minimis exemption for small business sector: flat fee, sliding scale, option of two choices
De minimis	Should be reduced to capture more companies ... determine fair level ... go after magazines from out of province publications
De minimis	Large #'s of companies under de minimis is unfair
De minimis	Remove de minimis & replace with flat fee
De minimis	Do not support raising
De minimis	Option S/B available for flat fee or sliding scale
De minimis	Simpler way needed for small business to evolve more to pay without imposing onerous burden
De minimis	Both sides of de minimis issues had valid points
De minimis	Should provide reporting and payment options to large and small stewards
Dis-aggregation	Will introduce additional complexity
Dis-aggregation	Do not dis-aggregate plastic
Dis-aggregation	Do not support disaggregation of plastic packaging
Dis-aggregation	Main concern - currently rewards low recovery plastics that have not invested in recycling, while penalizing those that have
Dis-aggregation	Data already being reported, so no work to implement
Dis-aggregation	Disagree with dis-aggregation ... food packaging is strictly regulated which limits options
Dis-aggregation	Total aggregation is simpler and dis-agg will lead to contrived penalties
Dis-aggregation	The funding formula sets fee rates for tetrapak that are too low because of the cross-subsidy from other paper packaging
Dis-aggregation	Combine OCC and OBB and Other has more potential
Dis-aggregation	Aggregation offsets effect of funding formula weightings
Dis-aggregation	Dis-Agg is not burdensome as data exists and is reported
Dis-aggregation	Eliminate Plastic Agg ... Look at how recycled materials are managed and marketed to determine
Dis-aggregation	Strongly recommend PET and HDPE dis-aggregated
Dis-aggregation	Support complete dis-agg of all material categories
Dis-aggregation	Support dis-agg of box board and corrugate
Dis-aggregation	Unless all packaging is mandated to be included in each blue box program, more materials should be sharing this cost; must avoid giving materials a competitive advantage
EE Fund	10% E&E should be reduced to reflect actual use ... need payback and use efficiently or reduce
EE Fund	Should use better leveraging to promote enhanced municipal recovery of recyclables
Equalization	Use 60%, not 75% as the target for the equalization factor
Equalization	Adj formula to eliminate x-subsidization of revenue in formula
Equalization	Consider eliminating or adjusting as this result is similar to recovery section
Equalization	Use 60% not 75% as established and allow credits for recovery over 60%
Fairness	No incentive for stewards to choose packaging that is land-filled or recycled

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Fairness	Contributing 25% of materials but 40% of cost is unfair
Fairness	Low recovery material will cross-subsidize high recovered material ... may cause "de-selection"
Fairness	Municipalities decide which material to recycle ... PET food and bev bottles is only mandated material ... should be HDPE too
Fairness	Packaging may be enviro-friendly (Green House gases) but not highly recyclable
Fairness	There are/may be benefits from using pkging which is NOT highly recyclable ... food wrap saves lots of organic waste
Fairness	Plastic film difficult to recycle, no penalty will change that
Fairness	Ensure that accurate costs are reported by municipalities and that nexus is supported by the formula
Fairness	Validation of costs of recycling at Materials Recovery Facilities to ensure they are in-line with industry standards
Fairness	Treating stewards and materials fair is paramount
Generation	All stewards should report their waste and be accountable for its disposal
Generation	Using waste audits combined with stewards reports is reasonably accurate and transparent
Generation	Continue using household waste audits
Generation	Using household waste audits is fair for all stewards
Generation	Leave as is .. Danger of information becoming available under Freedom of Information
Generation	Do not support fees based solely on steward reports
Generation	Continue to use waste audits
Generation	Continue using waste audits as sales exclude deminimis portion
Harmonization	Opportunity to introduce data reporting systems, terms and data reporting systems
Harmonization	Strongly opposed to harmonization of the Ontario model across the country
Incentive/Credit	Insufficient financial incentive to select materials with low recovery costs - potential for growing inequity
Incentive/Credit	Start with 100% net cost and provide credit for "avoided cost" of trash collection and disposal in
Incentive/Credit	Use diversion credit for recovery over 60% and avoided cost of disposal credit (recycling reduces waste disposal cost)
Incentive/Credit	Use incentive based approach to incent recycling rather than disposal
In-Kind	Should not be allowed if other stewards costs increase as a result
In-Kind	Absence of a level playing field remains
In-Kind	In-Kind should not be allowed or calculated at market value, not list price of media
In-Kind	In-Kind should be available to other stewards
In-Kind	Would like opportunity to use in-kind in catalogue
In-Kind	Currently using highest "card rate" and is unfair and includes profit factor
In-Kind	Not clear entire contribution is needed to support recycling ... should be based on program needs not cost of obligation
In-Kind	Eliminate in-kind ...Special case agreement challenges entire credibility of BBPP
Other	Primary packaging can't go into BB in many municipalities
Other	Recognize and reward BB materials with higher market demand ... corrugate and aluminum
Other	Communicate costs to consumers so they understand and can make choices
Other	Provide incentive for materials easily recycled
Other	Provide incentive to move to recoverable packaging where there is no health risk
Other	Provide incentive to reduce generation
Other	Provide incentives for retailers who recycle .. Eg plastic bag collection
Other	Reduce fees for enviro-friendly packaging
Other	Analysis of BB performance relative to the 3 R's is a pre-requisite to the review
Other	Do not reward materials with reduced impact on waste stream ... goes beyond purpose of levy to raise funds (not a place for lifecycle analysis)
Other	Consider special task force for "entire life cycle" contribution
Other	Energy from waste may be good option
Other	60% target by gov't but municipalities determine what is recovered and how, and therefore which materials achieve targets
Other	Establish "Future of Recycling" committee for L.T. Planning & New Materials
Other	Should be a credit for "light-weighting" to encourage waste reduction
Other	Current packaging represents least possible packaging option and current program is unfair
Other	Distinguish staples from luxury or non-staples ... use separate category for staples
Other	Long term supply agreements mean large fee increase can not be passed on
Other	Collecting fees from consumers directly would save enormous time and admin cost
Other	Do not consider rewarding "good" vs Bad" materials ... not total life cycle impact
Other	Flat unit fee is simplest overall
Other	The funding formula encourages shift from heavy packaging to lighter weight packaging even if lighter material recycled at a lower rate
Other	Do not reward stewards with reduced impact on waste stream (this is not the place for life cycle analysis)
Other	WDA is the real problem
Other	Current FF penalizes materials with low cost and high recovery, generally coinciding with recyclability, which is a dis-incentive to use more recyclable material
Other	Support market development fees to improve recovery rates and recycle markets
Other	Get consumers involved to improve overall waste diversion
Recycled Content	Reduce fees for producers who use recycled fibre board

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Recycled Content	Allow rebate for recycled content if diversion costs are reduced
Recycled Content	Provide incentives for recycled content (exploring use of recycled content should be best practice)
Recycled content	Credit for recycled content has merit in principle but only with different funding approach; results only redistribute money
Recycled Content	Add incentive for easily recycled packaging
Recycled Content	Fees should be 3 levels ... Landfilled, hard to recycle, easy to recycle
Recycled Content	Within the scope to allow credits for recycled content, regardless of where the material originates from
Recycled content	Closed and Open loop recycling S/B considered on equal basis
Recycled content	Food manufacturers do not have same ability to use recycled content
Recycled content	Verification issues make it difficult to consider this option ... more than 1500 plastic recyclers/handlers in N.A.
Recycled Content	Support recognition for those who use recycled materials; must consider closed and open loop recycling
Recycled Content	Good thought but too complex
Recycled Content	Recycle content is impossible to determine & manage
Recycled Content	Leave up to packaging supply sectors ... as a total average achieved during a rolling period
Recycled Content	It is possible to develop a recycled content credit: easier to focus on reuse (procurement), 50/50 pre and post, need to be significant level and value of credit
Recycled Content	Stewards who use recovered material should be recognized for their efforts in supporting green procurement
Recycled Content	Do not support as content does not impact handling costs
Reduced Impact	Must consider the entire life cycle of packaging as well as regulations for certain types of products, such as food
Reduced Impact	No specific position on incentives for using certain materials, but government should implement broad policies that provide incentives to industry
Registration	Would like to assist with voluntary steward as a national model to promote and simplify harmonization
Registrations	Have courier and Canada Post provide info for mags & subscriptions
Revenue	Support fees being set in accordance with the net cost of the material
Revenue	Do not change three year rolling average ... predictability is essential for stewards
Revenue	Strongly opposed to change in allocation of material revenue
Revenue	Use prior 12 months average rates, not three years
Revenue	Dis-Aggregation adds complexity... address recovery, not allocation per sub categories
Revenue	Change "cost to manage" weighting to show true value of materials
Revenue	Better calibration of the CSR 3-year price sheet to better reflect prices of materials captured in system
Revenue	Maintain 3 year average, recognize cross-subsidization in revenue allocation
Revenue	Strongly opposed to moving from 3-year rolling average for revenue
Revenue	Separate and use revenue as 4th component
Revenue	Unfair that FF does not account for revenue in fixed price contracts
Simplicity	Must keep in mind that other provinces are following Ontario's lead and major changes could cause a lack of harmonization
Simplify	Keep funding formula as simple as possible
Simplify	Simpler, easier & straight-forward approach required
Simplify	Reporting is too complex
Simplify	Current process very complex for stewards with thousands of SKU's, need special reporting mechanism
Simplify	Fees may be smaller than cost to calculate and report
Simplify	Large Business should have simplified options too as admin can be excessive
Simplify	Small business needs options ... Flat fee, Sectoral calc, Long method
Time Frames	Common year should be used for all FF inputs
Time Frames	Generation, costs & Revenue S/B on same time frame to simplify and make fair ...common year for all inputs
Weightings	No real benefit to adjusting factor weightings
Weightings	Reduce favorable weighting for high recovery materials
Weightings	Should be adjusted to reduce the favourable weighting given to materials with relatively higher recovery rates
Weightings	Don't penalize low recovery or difficult to recycle materials as it won't or can't change behavior
Weightings	Revised to give greater emphasis to the net cost factor: "least cost tonne"
Weightings	Examine if nexus is being met in the Equalization Factor and that the signal from this factor is correct
Weightings	No real change
Weightings	Totally opposed to 100% net cost factor
Weightings	Little impact by reducing equalization target to 60%
Weightings	Insufficient incentive for low cost tonnes targeted for achieving 60% diversion in Recovery Rate Factor
Weightings	Do not support 100% based on net cost, do not drop recovery to zero
Weightings	Factors S/B applied based on gross costs offset by 4th calc for revenue
Weightings	Change to 60% cost, 25% recovery, 15% equalization