

September 4, 2013

The Honourable Jim Bradley
Minister of the Environment
77 Wellesley Street West
11th Floor, Ferguson Block
Toronto, ON M7A 2T5

Re: Stewardship Ontario Submission on the Proposed *Waste Reduction Act*

Dear Minister Bradley,

On behalf of the Stewardship Ontario board, I am pleased to present our submission on the proposed *Waste Reduction Act* (WRA). More than 1,500 stewards report and pay fees to Stewardship Ontario, and they have a diversity of views on Bill 91 and product stewardship in general. Accordingly, this submission does not necessarily reflect the views of all stewards. Stewardship Ontario is in contact with and consults the steward community on an ongoing basis on a wide variety of issues including the future direction of product stewardship in Ontario. We have attempted to incorporate the spirit of these views in this submission.

The submission outlines a vision for a world-class recycling industry in Ontario, and includes our key concerns with the Act. Concerns that we believe will prevent this vision from being realized. We also propose solutions that would address our concerns, and ensure Ontario builds strong recycling programs that are effective and efficient, and that stimulate innovation and job creation.

Our overarching concern is that the municipal compensation (increasing municipal rights and powers), which is proposed in the Act, will entrench the current misalignment of responsibility, authority and accountability—preventing us from achieving our world-class vision. The result would be a sub-optimized Blue Box Program, stifled performance and investment, and little or no new job creation. Without one party clearly responsible for delivering strong environmental and economic performance, stagnation will result and the opportunity for excellence will be lost.

Industry producers fundamentally accept responsibility for managing end-of-life materials. Our motivation is underpinned by our desire to ensure Ontario benefits from the investments, innovation and new jobs required to operate effective and efficient programs. We are also motivated by our customers, who have told us loud and clear that they want products that are recyclable and recycled, and are already shifting their behaviour away from products that are not.

Producers generally support an individual producer responsibility framework (IPR) to deliver our obligations for the Blue Box and Orange Drop Programs. There must, however, be a fundamental alignment of responsibility, authority and accountability, a focus on outcomes and the flexibility for producers to achieve those outcomes optimally. One of the central principles

of good governance, indeed good government, is that the entity making a decision must bear the full consequences of the decision. Any transition process must have this alignment as its principle goal, and ensure that, in the case of the Blue Box Program, any increase in producer responsibility in the form of financial obligation be accompanied by a commensurate increase in producer authority to achieve true accountability. The Environmental Commissioner of Ontario supports such a framework, as does industry, because it maximizes producer freedom to choose the most effective and efficient path forward.

As it stands, however, the proposed increase in municipal rights and powers will, in effect, create a tax regime, where producers have no authority or responsibility over Blue Box Program expenses, and simply compensate municipalities for their costs. This is the approach adopted to date in Quebec, which has resulted in a complete misalignment of responsibility, authority and accountability. Producers fear that the proposed increase in municipal rights and powers could be used similarly in Ontario, and lead to a doubling of Blue Box costs—or more—that will reduce the competitiveness of Ontario producers. This complete relief of responsibility for municipalities will eliminate any financial motivation for them to improve efficiency and contain costs. The status quo would, therefore, be preferable.

On behalf of the board, I look forward to discussing the fundamental changes that we believe the legislation requires, so all the tools are in place for Ontario to become a world-class leader in recycling—where investment leads to innovation, job creation and strong environmental performance.

Sincerely,

A handwritten signature in blue ink that reads "John D. Coyne". The signature is written in a cursive, flowing style.

John Coyne
Chair, Stewardship Ontario

Making Ontario a World Leader in Environmental Sustainability

Ontario producers and product stewards know that if they fail to address the environmental impacts of their products, they risk eroding consumer confidence and losing market share.

At the same time, organizations in Ontario's resource recovery sector are increasingly using modern, innovative collection systems to turn waste into valuable raw materials that can be recovered, processed and used to make new products.

A number of European governments have enacted some of the most progressive waste management regulatory frameworks. They have created producer responsibility laws that anticipate how each actor—from consumers, to producers, to local municipalities—will react over time. Their approaches rely on the power of consumer choice and the ability and determination of business to innovate to achieve environmental results. In the process, they create new jobs in a vibrant and growing recycling sector.

Our municipalities have historically been at the centre of Ontario's waste diversion agenda. The next wave of waste diversion innovation and efficiency will be achieved by municipalities working with other partners—encouraged by appropriate incentives to make continuous improvements.

Ontario's producers believe that they are on the cusp of a rare opportunity to reform the way they take responsibility for their end-of-life products and packaging in the province.

All of the above brings us to a critical juncture. Ontarians want to recycle more, but Ontario's legislative framework is no longer encouraging maximum innovation in waste diversion and resource recovery. So much more could be achieved through regulatory improvements that will deliver long-term results for Ontario's environment and economy.

Making Ontario a world leader in environmental sustainability is about building the conditions for Ontario to take another quantum leap in waste diversion—just like we did when the original Blue Box Program was created.

The remainder of our submission offers a vision of what's possible, and includes the following sections:

- **Providing Leadership with Insight**
- **Producer Responsibility: Delivering Environmental Accountability, Fairness and Innovation**
- **Why Reform Ontario's Current *Waste Diversion Act*?**
- **Building on Today's Success Toward A Common Vision**

- [The Opportunity to Enhance Bill 91](#)
- [Parameters for Making Ontario a World Leader in Environmental Sustainability](#)
- [Working Together to Achieve Results](#)
- [Summary of Stewardship Ontario Changes Requested](#)

Providing Leadership with Insight

We can build a framework here in Ontario to lead the world in waste reduction. We have the expertise, the critical mass willing producers and environmental leadership.

But Ontario's proposed Bill 91 would not create the conditions for success. It does not commit to aligning the authority, responsibility and accountability required to create a more innovative, economically productive and efficient system.

Instead of shrinking from the opportunity to provide leadership, and be recognized as innovators when it comes to waste reduction, we should develop a model for waste management and environmental sustainability here in Ontario that will be admired and respected across the world for its insight and intelligence.

Producer Responsibility: Delivering Environmental Accountability, Fairness and Innovation

Society has always created waste, and always will. Addressing the fundamental problem of waste in the future, including reduction and design-for-the-environment, involves fresh thinking and a departure from historical approaches. Ontario's past methods are based on responsibility for waste being shared between parties—such as producers and municipalities, or producers and consumers.¹ This approach is inefficient, creates unproductive tension and results in sub-optimal compromises that please no one.

There is another way. Make a single group clearly and fully responsible for waste diversion outcomes. As the producer has a unique ability to effect change through the entire life-cycle—from point-of-design to utilization as secondary resources—assigning full responsibility to producers is essential to achieve the long-term objectives of waste reduction and diversion. To achieve these objectives, producers must have the ability to determine how to keep their products out of the waste stream.

At its most effective and innovative, producer responsibility provides obligated companies the flexibility to choose how to meet those responsibilities. And the quid pro quo of flexibility is accountability for meeting the environmental outcomes Ontarians expect.

¹ The Regional Public Works Commissioners of Ontario's *"Re-Thinking Waste" in Ontario* policy paper notes

Partnerships and Relationships

After more than 15 years of product stewardship development across Canada it's clear that producer responsibility extends beyond them managing their waste or paying someone else to do so.² It's about producers organizing their businesses, establishing partnerships and creating commercial relationships to ensure sustainable materials management—whereby product waste is recovered when the consumer discards it and is reused as a raw material to produce a new product or packaging material, consuming considerably less energy than it takes to manufacture from scratch.

It's about producers' relationships with consumers whose purchases become the source of end-of-life products, and with retailers³ who act as a bridge between themselves and consumers. It's about producers' relationships with the municipalities where consumers reside—the local governments who have historically managed a large proportion of their end-of-life products and packaging. It's about producers' relationships with the resource recovery sector that collects, reuses and recycles materials so that they can re-enter the economy.

Engaging Skills, Knowledge, Resources

While everyone has an important role to play in waste diversion, under producer responsibility businesses do not shift their obligation to, or share their obligation with, consumers, retailers, municipalities or resource recovery companies. Instead, producers discharge their responsibility by engaging these parties through arrangements on mutually agreeable terms, so that the best skills, knowledge and resources of all parties are used in ways that generate the best performance.

Consumers, manufacturers, retailers, municipalities and resource recovery companies are all important actors in the environmental value chain. If each is encouraged to unleash skills and competencies, we can achieve substantive gains for consumers, the environment and the economy.

The absence of the bookend role of producer responsibility and the corresponding ability to deliver, and be held accountable for, smarter solutions—which some might call say-for-pay—has resulted in frustrations with the current Waste Diversion Act.

Reducing Costs and Increasing Productivity

At its essence, full producer responsibility is both an environmental measure and an economic one. With full responsibility, and the freedom to choose how to meet their obligations,

² “Extended Producer Responsibility is an environmental protection strategy to reach an environmental objective of a decreased total environmental impact from a product, by making the manufacturer of the product responsible for the entire life-cycle of the product and especially for the take-back, recycling and final disposal of the product.” Lindqvist, T., 1992. *Extended Producer Responsibility as a Strategy to Promote Cleaner Products* (1-5). Lund: Department of Industrial Environmental Economics, Lund University.

³ Retailers may also be producers.

producers will build relationships that will reduce costs to Ontarians, and will ultimately integrate recycling as another important business priority.

Genuine producer responsibility creates that win-win-win scenario. Municipalities continue as an important partner in providing services, such as Blue Box collection, to their residents, if they so choose, but back-end processes are more efficient. Consumers will, over time, be able to add more to their Blue Boxes. And producers will be incented to develop more efficient packaging, and develop and deploy innovations that deliver significant productivity gains as a result of how waste is managed and recycled.

Why Reform Ontario's Current *Waste Diversion Act*?

Almost everyone within the waste diversion space agrees that Ontario's *Waste Diversion Act 2002* (WDA) needs updating. The opportunity now exists to create a framework for effective producer responsibility—one that encompasses environmental accountability. This is something that the WDA simply does not adequately deliver.

Today, producers have limited choice about how to discharge their obligations. The current legislation places them in Industry Funding Organizations (IFOs). If they wish to opt out through an industry stewardship plan, the process is cumbersome.

Turn Animosity into Collaboration

The WDA imposes a cost-sharing formula in the case of Blue Box waste, with producers and municipalities splitting costs 50/50. This formula has contributed to frustration and animosity between two parties who should ideally be working together with shared goals—focused on achieving our waste diversion objectives efficiently and harmoniously.

Under the WDA, producers and the resource recovery sector are required to establish their relationships within the context of a program approval process that has led to arbitrary and static arrangements with recyclers.⁴ This legislated approach leads to frustration and discord between two parties who need to work together effectively if there is to be any success in achieving waste diversion objectives.

As an example of a poor relationship that has developed under the WDA, municipalities are frustrated by the absurdities of the current rate-setting approach for establishing annual producer payments to fund municipal collection and processing of printed paper and packaging. Ontario municipalities have said that *“some of the materials that end up in municipal recovery systems are becoming very difficult to manage. As stewards introduce new, lightweight and*

⁴ Ontario Waste Management Association. March 2013. Rethink Waste: A Blue Print for Harnessing the Economic Benefits of Resource Management in Ontario.

difficult materials into the system, they should ultimately be responsible and accountable for the end-of-life costs of managing these materials.”⁵

Manage Risks and Consequences

The growing unproductive tensions and animosity between municipalities and producers have their sources, to a large extent, in the current legislated funding model. A more positive approach would be for producers to assume and manage the risks and consequences associated with changes in the types, quantities and value of printed paper and packaging. Freed of these risks and consequences, municipalities could then focus on being residents’ waste management interface, and delivering collection services for recyclable materials. Faced with these risks and consequences, producers would be encouraged to respond in ways that would improve both environmental performance and efficiency.

We already enjoy perhaps the largest and most comprehensive curbside collection program in the world. Allowing producers to deploy their proven capacity to innovate and build upon this success, will ensure that the system grows and adapts cost-effectively to global trends in consumer packaging.

Define Roles and Responsibilities

The Government of Ontario also feels constrained by the WDA’s *“lack of compliance and enforcement tools to ensure accountability for recycling results.”⁶* Along with constraints that derail environmental outcomes, the Government of Ontario is saddled with the unenviable, and wholly unnecessary, role of approving the pricing of IFO fees levied on producers as well as producer payments to municipalities.

Over time, the WDA has been the source of frustration and discord between producers and municipalities, between producers and the resource recovery sector, and between the provincial government and producers. This frustration arises because none of these parties is ultimately responsible for, and therefore able to deliver on, the government’s desired vision in ways that simultaneously exceed expectations and create efficiencies.

By defining roles more clearly—and placing the burden of responsibility squarely on producers—the whole system will produce better results. Those results will be a function of greater environmental accountability to all parties connected with the designated wastes, and of greater innovation as a result of providing producers with the maximum flexibility to achieve environmental outcomes. Now is the time to create a new and different model—one that creates the context for creative collaboration and innovation.

⁵ Association of Municipalities of Ontario. May 6, 2013. Correspondence to the Honourable Jim Bradley, Minister of the Environment

⁶ Ontario Ministry of Environment. June 2013. Waste Reduction Strategy

Building on Today's Success Toward A Common Vision

Despite the existing constraints of the WDA, producers have aggressively pursued innovation, investment and job creation, as the following two examples demonstrate:

Curbside Collection of Beverage Cups

Plastic-laminated paper beverage cups—the kind you find in your local coffee shop—are a valuable source of high quality paper fibre. It's been a challenge to capture enough of this laminated paper packaging for economical recycling, because not all municipalities accept paper beverage cups in the Blue Box. Some are destined for the Green Bin—converted into compost—but many are still thrown in the garbage.

There was a need to find North American processors with the technology and the capacity to handle the materials sustainably, keep the value of the recycling at home and demonstrate the role curbside collection could play in efficiently, effectively and economically recycling this material from households.

In addition to hydro-pulpers, Stewardship Ontario collaborated with beverage cup stewards like Tim Hortons, municipalities, collectors and sorters—all interested in expanding Blue Box materials and maximizing their value. The success of the pilot programs in Burlington and the County of Brant now opens the doors for more municipalities to expand the materials they accept in Blue Boxes across Ontario.

Mixed-Plastic Recycling Technology Diverts 10,000 Tonnes from Landfill

Another recycling challenge has been to create a closed-loop process for mixed plastics. When EFS-plastics owner and president, Martin Vogt, moved to Canada in 2006, he saw a gap in the recycling market. Nobody had found a commercially sustainable solution for processing mixed plastics to create raw materials for new products. So, as soon as Stewardship Ontario invited proposals for innovative mixed plastics recycling solutions, Martin's company was among those that stepped forward.

Investment from Stewardship Ontario enabled EFS-plastics to double its capacity and relocate to nearby Listowel, where the new 39,000-square-foot plant will be able to process up to 12,000 tonnes of mixed plastics a year. It's here that the company produces high quality resin pellets, which can replace virgin plastic up to 100 per cent in the manufacture of new consumer products. The company sources its Blue Box mixed plastics from Waterloo, Hamilton, Niagara Falls and York Region, as well as other municipalities in Ontario, Quebec and the U.S.

EFS-plastic's closed-loop manufacturing process currently diverts over 10,000 tonnes per year of mixed rigid plastics (#1-#7) and plastic films (#2 and #4) from landfills, saving more than 2,000 megawatt hours of energy—the annual consumption of approximately 1,700 4-person households.

These are just two examples of producers taking responsibility for end-of-life products and stimulating innovation and investments that create new jobs. Fixing the WDA will remove the brake on further progress. Far more than in other jurisdictions—such as in most of the United States—we have agreement and common ground in our collective vision of recycling and waste management here in Ontario. The government has identified important desired results in its Waste Reduction Framework for Ontario that aim to vastly improve the current Waste Diversion Act. However, we believe that Bill 91, in its current expression, will not achieve them.

The Opportunity to Enhance Bill 91

While Bill 91 does allow greater flexibility for producers by ending mandatory collectives in favour of individual producer or voluntary collective responsibility, it does not address other fundamental flaws in the WDA. The most important of these is the Bill's treatment of the critically important relationship between producers and municipalities.

In Ontario, municipalities have a longstanding role in the collection of Blue Box waste⁷ and municipal household or special waste (MHSW). Municipalities recognized the need for diversion, offered collection services and supported them with resident education initiatives. Municipalities have also been the managers-of-last-resort for any products and packaging not captured by product stewardship efforts.

Bill 91 allows municipalities:

- The right to register with the Waste Reduction Authority (the Authority) whereby producers are then obligated to compensate municipalities for collection and recycling of the designated materials;
- The expectation of financial compensation through either 'voluntary' agreements with producers or compensation payments determined either by the Authority or through regulation; and
- The authority to design, deliver and control collection and processing of designated wastes for which they have responsibility.

Under this approach, the municipalities' ability to negotiate voluntary agreements with producers is augmented by the ability to invoke the Authority to intervene and set the rate of producer payments to municipalities.

An Opportunity to Create Incentives

This doesn't create any incentives for municipalities to reduce the cost or increase the revenue from recycling. That's because giving municipalities the option of going directly to the regulator

⁷ Under O. Reg 101/94 Recycling And Composting of Municipal Waste under the Environmental Protection Act.

(or its agent) to determine how much producers should pay is a fundamental abrogation of producer responsibility. The practical effect of this policy is to eliminate the producers' ability to manage the designated waste during its entire life cycle through to utilization as secondary resources, and to transform producers' financial responsibility for this activity into a regulated tax.

Producers have to pay, and don't have the chance to encourage municipalities to lower their costs or find ways to get the most back from recovered materials.

An Opportunity to Resolve Dysfunction

This approach also perpetuates and worsens the existing dysfunction of producer/municipal shared responsibility. Producers will have no say or control over municipal costs that producers themselves will have to pay. And municipalities will have no say or control about producers' product design choices that may be more challenging or expensive to recycle.

Continuing and intensifying the existing dysfunction will cause harm to Ontario. It will perpetuate stagnant recycling rates, eliminate opportunities for innovation, create ongoing tensions and disagreements between municipalities and producers and mire the Authority in interminable mediation and dispute resolution processes.

An Opportunity to Improve Diversion Performance

Shifting to a principled definition of producer responsibility yields a more practical outcome—and one that better protects the municipal interest in their self-described role as the measure-of-last-resort for waste that is not collected and recycled. Most importantly, it will unleash producers' unique ability to effect change through the entire life-cycle—from point of design to utilization as secondary resources—in order to improve diversion performance.

Parameters for Making Ontario a World Leader in Environmental Sustainability

This document is based on a common vision that more effective relationships among producers, municipalities and the resource recovery sectors will deliver better waste diversion outcomes and support new economy jobs in the waste diversion technology sector. This common vision is based on holding producers fully responsible and accountable for managing their designated wastes. The characteristics of such an approach include:

- **Producer collection and recycling targets**, whereby producers must meet regulated waste service standards (like collection service) and waste diversion⁸ standards (like collection targets and recycling standards) for designated materials;

⁸ While Bill 91 utilizes the term 'reduction', this document uses the term 'diversion' to encompass all 3Rs.

- **Shifting of regulatory requirements to collect and process designated materials from municipalities to producers.** This would include the ability for producers to negotiate with municipalities for the collection and processing of designated materials and for municipalities to negotiate to their advantage or to opt out entirely, leaving producers to establish their own systems meeting the regulated waste service and recycling standards at their own cost; and
- **Penalties** that producers would face for failing to achieve waste diversion standards with penalties in relation to the portion of the waste service standard they failed to achieve.

To meet regulated waste service and diversion standards under this approach, producers would need to negotiate access to the designated wastes collected in existing systems or build entirely new collection systems.

Bargaining Power and Collection Incentives

For materials such as printed paper and packaging historically collected at the curb, producers need the curbside materials that municipalities are collecting in order to discharge their obligations. Given the historical municipal role in delivering curbside collection systems and the bond municipalities have built with residents through this service delivery relationship, municipalities are in the best position to work with producers that need access to these materials. As such, municipalities are afforded bargaining power that they do not currently have under the shared responsibility system set out in the WDA.

By adhering to the producer responsibility approach described above for materials collected in systems other than curbside (like private depot, return-to-retail, return-to-charities, special collection events), producers have incentives to collect designated materials in new ways, helping to keep those materials out of the municipal waste stream.

Legislative Amendments and World Leadership

Given the above, Bill 91 should be amended to eliminate provisions for municipalities to opt themselves into the collection and processing of designated wastes, or to give the Authority or Ontario government the power to set a producer/municipal compensation formula for a designated waste.

By holding producers responsible and accountable for waste diversion outcomes, the necessary arrangements to achieve those outcomes will be made. If the provincial government can set the regulated waste service and diversion standards, and the Authority can ensure those outcomes are met, producers will deliver. They will meet or exceed service and diversion standards by engaging with municipalities and the resource recovery sector in such a way that each party has the ability to negotiate the role it wishes to play in delivering waste diversion. This will unleash fresh ideas, innovation and world leadership in this important and growing sector.

The Power of Decision

The concept of genuine producer responsibility is a big idea. It provides fairness—because if you’re paying for something, you should have the right and the choice to ensure your money is being spent effectively. This core principle reflects Ontarians’ values, is practical and enjoys a broad consensus.⁹ The Ontario Ministry of Environment appreciates that a fundamental principle for improving Ontario’s waste diversion framework is that *“Producers who bear responsibility for the management and environmental impacts of waste associated with products they put into the marketplace, should be given the flexibility to decide how best to achieve their legislative and regulatory obligations.”*¹⁰ Only when producers and municipalities are offered the right downstream incentives, can we *“engage the innovative creativity of producers, waste management service providers, municipalities and consumers to divert more waste from landfill and turn it into new products, green jobs and new investment opportunities in Ontario.”*¹¹

Working Together to Achieve Results

We are at critical crossroads. As drafted, Bill 91 would entrench stagnant performance and ongoing discord. But there is another option. A progressive approach that puts responsibility squarely on the shoulders of producers. An approach, which will have the positive consequences of delivering better environmental performance, new business opportunities for Ontario recyclers and manufacturers and more, well-paying, new-economy jobs for Ontario.

Producers are ready to welcome a new level of responsibility—as long as they can help shape a world-class, modern and efficient waste management supply chain. Ontario consumers are ready and eager to participate even more than they do already, if we give them better choices and more convenient opportunities to participate. The resource recovery sector is ready and poised to lead a renaissance of Ontario manufacturing, if we are prepared to create the right conditions.

Municipalities are also ready. They, like us, want to see change, and we are confident the kind of change we have outlined in this paper will benefit municipalities, residents and consumers alike, in ways we have only just begun to recognize.

Let’s choose a greener tomorrow for future generations, with a progressive made-in-Ontario approach.

⁹ The Summary Report on the Environmental Commissioner of Ontario’s Roundtable on Extended Producer Responsibility (November 28, 2012) provides a clear summary of the general consensus toward producer responsibility noting strong support for the statement that *“Both individual producers and collectives should have the flexibility and autonomy to determine the best – most efficient and cost-effective – way to meet the outcomes”*.

¹⁰ Ontario Ministry of Environment. October 2009. From Waste to Worth: The Role of Waste Diversion in the Green Economy Minister’s Report on the Waste Diversion Act 2002 Review

¹¹ Ibid. Footnote 6

Summary of Stewardship Ontario Changes Requested:

Area	Requested Change	Rationale
Individual Producer Responsibility (IPR)	Remove municipal compensation section and add new purpose statement indicating that responsibility, accountability and authority must be aligned under IPR.	Aligned with Canadian Council of Ministers of the Environment (CCME) definition of producer responsibility. Will also unleash producer investment and innovation with goal of creating more effective and efficient programs.
	Add legislative certainty that rising Blue Box obligation will not occur without rising producer authority/responsibility—e.g., no change to current 50 per cent share without power sharing agreement between producers/municipalities.	If producers are going to continue to invest effort and resources in Ontario to fulfill the full promise of Blue Box recycling, they need to be confident that there will be a legislative and regulatory framework to support success.
	Simplify and reduce requirements for intermediary agreements. Limit powers of WRA to interfere in commercial arrangements between producers and intermediaries.	Producers should have maximum flexibility to determine their commercial arrangements. Micromanagement is unnecessary and detrimental.
Transition	Transition to new framework as quickly as possible for both Blue Box and Orange Drop Programs.	Limit uncertainty associated with transition process that could affect performance and investments.
	Add language that allows existing IFOs to be recognized as intermediaries to allow IFOs to avoid HST as programs transition.	The requirement for IFOs to pay HST is rooted in how the existing WDA is structured. It is unnecessary, and can be avoided.
Oversight and compliance	Do not continue WDO as the Waste Reduction Authority. Sunset WDO as WDA programs transition, and create a parallel Authority to oversee new producer obligations or absorb oversight and compliance within MOE.	Powers of envisioned Authority are vastly different than WDO's current mandate; therefore a clean slate would best ensure each separate regime is focused in discharging its mandate.
	Eliminate policy role of WRA if	Independence of enforcement

	it's retained in final Bill.	function would compromise a policy role.
	Require WDO and/or new Authority to publish full budgets and performance against budget to increase transparency of how producer funds are spent.	Producers deserve to know in more detail how their resources are being spent. This would ensure greater accountability of any Authority.