

Stewardship Ontario

Developing a Proposal for an Amended Blue Box Program Plan Module 1 – The Proposed Transition Process

Presented to: Ontario Municipalities and First Nations Communities October 12, 2017

Webinar details

- Speaker advances
 slides
- Sound slider (1)
- Questions/comments at 'Ask a Question' (2) then click 'submit'
- If you have technical issues also let us know via the "Ask A Question" box





Consultation Background

AMENDMENT TO THE BLUE BOX PROGRAM PLAN

October 2017





Why are we here today?

Minister's requirement letter for an amended Blue Box Program Plan

- August 14, 2017 requirement letter from Minister
 - Directing RPRA and Stewardship Ontario to prepare a proposal for an amended Blue Box Program Plan (a-BBPP)
 - To transition the Blue Box Program from its current shared cost model to full producer responsibility
 - To be developed collaboratively with municipalities, stewards and affected stakeholders
 - To build on accord reached by Stewardship Ontario and municipal representatives set out in July 7, 2017 letter to the Minister



Minister's direction for a-BBPP

- Seamless transition for residents
- Support reduction, reuse, recycling and re-integration of PPP
- Continuous improvement of environmental outcomes
- Effective economic methods to incent behaviour changes
- Drive innovation through collaboration and competition
- Avoid stranded assets to extent possible
- Provide choices for transitioned municipalities
 - Can choose to act on behalf of SO for procurement and contract oversight of collection services
 - Can participate in post-collection management
- Address in-kind contribution from newspaper industry at no cost to municipalities



Who is RPRA?

Overview of RPRA

- November 2016, former Waste Diversion Ontario continued as RPRA, a non-crown, not-for-profit corporation responsible for:
 - Overseeing diversion programs continued under the WDTA
 - Approving wind up plans for programs and IFOs as directed by the Minister and overseeing implementation
 - Approving proposal for a-BBPP for submission to minister
 - Operating a registry to receive and store information related to resource recovery and waste reduction activities
 - Providing information to the Minister upon request
 - Undertaking compliance and enforcement under both the RRCEA and WDTA



a-BBPP Roles & Responsibilities

Minister, MOECC

- Minister
 - Provides direction
 - Considers the a-BBPP submitted by the Authority
- MOECC
 - Receives updates from RPRA and Stewardship Ontario



a-BBPP Roles & Responsibilities

Stewardship Ontario

- Stewardship Ontario
 - Drafts content for and the a-BBPP
 - Conducts consultations on the content for and the a-BBPP
 - Provides all consultation comments to RPRA
 - Following consultation, submits a draft final a-BBPP to RPRA for review
 - Jointly with RPRA, prepares a report on the consultation process for submission to the Minister



a-BBPP Roles & Responsibilities

RPRA

RPRA

- Reviews and comments on draft documents developed by Stewardship Ontario
- Participates in and monitors consultation
- Considers the draft final a-BBPP submitted by Stewardship Ontario in accordance with the WDTA and the Minister's direction; if compliant, approves and submits to the Minister
- Jointly with Stewardship Ontario, prepares a report on the consultation process for submission to the Minister



Roles & Responsibilities

Stakeholders

- Consultation is focused on five primary groups:
 - Steward
 - Local governments
 - First Nations communities
 - Waste management industry
 - Environmental non-government organizations (ENGOs)
- Collaborative approach using consultation sessions and meetings
- Seeking stakeholder input throughout process to develop a-BBPP



The Consultation Process

October 2017 to January 2018

- First phase
 - Stakeholders and Indigenous Peoples invited to meetings to discuss and provide feedback on features of the a-BBPP
 - Discussion at and feedback from these meetings will help Stewardship Ontario draft an a-BBPP proposal
- Second phase
 - Draft a-BBPP proposal will be available to stakeholders in December 2017
 - Discussion at and feedback from these meetings will help Stewardship Ontario finalize the a-BBPP proposal



Timeline

February 15, 2018 deadline for submission to the Minister

- August 14, 2017 Letter from Minster received by RPRA and Stewardship Ontario
- September 2017 Authority and Stewardship Ontario develop a Stakeholder and Indigenous Peoples Engagement and Communications Plan
- October/November 2017 Stewardship Ontario presents information on aspects of a-BBPP proposal; Authority monitors the consultation process



Timeline continued...

February 15, 2018 deadline for submission to the Minister

- December 2017 Stewardship Ontario posts a draft a-BBPP proposal for comment
- January 2018 Meetings to present draft a-BBPP proposal; comments submitted inform preparation of draft final a-BBPP proposal for submission to the Authority
- **February 2018** Authority considers the a-BBPP proposal and, if approved, submits to the Minster for consideration



Contact RPRA

a-BBPP Questions & Comments

- Geoff Rathbone, Director of Transition
 - grathbone@rpra.ca 416.226.1253
- Wilson Lee, Director of Stakeholder Relations
 - <u>wlee@rpra.ca</u> 416.640.6093
- Mary Cummins, Program Lead for Blue Box Program Plan
 - mcummins@rpra.ca 416.640.6961



Today's agenda



- 1. Transition: An overview
- 2. Proposals on:
 - 1. Non-transitioned communities: Payment approach
 - 2. Transition eligibility criteria
 - 3. Procurement of collection services
 - 4. Procurement of post-collection services
 - 5. Expansion of services
- 3. Review of engagement & consultation process and next steps

Our objective today



- Begin a conversation with municipalities and First Nations communities...
- About proposed features of an amended Blue Box Program Plan (a-BBPP)...
- That pertain specifically to municipal and First Nations communities...
- And are designed to transition the Blue Box Program to full producer responsibility.
- Your input will inform the ultimate proposed draft of an a-BBPP.



TRANSITION: AN OVERVIEW



- "Pursuant to an agreement being reached between Stewardship Ontario and each participating municipality and subject to necessary amendments to relevant regulations being made by the Lieutenant Governor in Council [O.Reg. 101/94], SO would provide services for residential paper products and packaging (PPP) supplied by stewards to Ontario residents and covered under the Blue Box Program".
- This first phase of transition, "will set the stage for a second phase of transition that will result in individual producer responsibility under the *Resource Recovery and Circular Economy Act, 2016* (RRCEA)".
 - RRCEA has no mechanism to plan such transition: It is a means to obligate responsible persons to collect, manage and report regarding designated materials

How did we get here?



Date	Milestone
Early 2017	Municipalities state interest in increased producer responsibility for PPP subsequent to passage of <i>Waste Free Ontario Act, 2016</i>
April 18, 2017	Municipalities and producers meet
May 4, 2017	Formal presentation of transition principles and mechanisms by producers to MRRRC
Spring 2017	Producer and municipal representatives work to resolve key principles and issues
July 7, 2017	Directors of Stewardship Ontario and municipal leaders reach accord on principles and mechanisms, and transmit accord to Minister
August 14, 2017	Minister issues Direction for Proposal for an Amended Blue Box Program Plan



• <u>Transitioned communities</u> are those for which Stewardship Ontario has assumed responsibility for the collection and management of PPP.

 <u>Non-Transitioned communities</u> are those that continue to deliver PPP collection and management services to residents under shared responsibility and will be paid under Section 11 of the WDTA.

Transition objectives



- Stewardship Ontario to assume both financial and operational responsibility (and accountability) for PPP collection and management.
- Over time Stewardship Ontario will systematically replace the agreements that exist today with hundreds of its own agreements with communities and service providers for collection and management of PPP. Today:
 - Several hundred collection and processing contracts with varying expiry dates (>90% by tonnes): or
 - Directly by communities (<10% by tonnes).
- Increase diversion to 75% of the PPP supplied by stewards to residential households (plus material-specific management targets) where Stewardship Ontario has assumed responsibility.

Anticipating the Pace of Transition





In meeting the objective



- Seamless transition to producer responsibility with uninterrupted collection service to Ontarians.
- Minister's requirement letter: "Driving innovation through collaborative and competitive efforts by:
 - Supporting cooperation among parties, including stewards, municipalities, waste management industry, and other affected parties, to bring complementary abilities to deliver better results, and
 - Promoting competition by ensuring a fair and open marketplace for Blue Box services under the WDTA and not creating barriers to competition when the program transitions to individual producer responsibility under the RRCEA".

Module 1: Overview



- Describe what will happen in non-transitioned communities
- Describe the mechanism by which communities will become eligible to transition
- Describe how Stewardship Ontario will procure collection and post-collection services and pay for services in transitioned communities:
 - Where those services are delivered to residents today
 - Where it will incrementally expand services beyond what is delivered today

Questions?







NON-TRANSITIONED COMMUNITIES: PROPOSED APPROACH



- Define the eligible costs to be included in calculating the net cost for the purpose of making payments to non-transitioned communities in accordance with section 11 of the Waste Diversion Transition Act (WDTA)
 - "results in the total amount paid to all municipalities under the program being equal to the applicable percentage [50%] of the total net costs incurred by those municipalities as a result of the program"



- Ontario communities that participate in the Blue Box Program and wish to receive payment will:
 - Operate recycling programs in accordance with the requirements of Ontario regulation 101/94
 - Engage in resident promotion and education activities
 - Provide accurate material cost and diversion reports to the RPRA Datacall in accordance with the Datacall Guidebook
 - Provide or facilitate access to data and facilities as reasonably required by Stewardship Ontario to discharge its obligations (e.g. set steward fees)

Current eligible costs prevail



Datacall User Guide

- The verified net cost incurred by non-transitioned municipalities and First Nations Communities will be used to calculate payments by Stewardship Ontario
- Existing eligible material sources and cost categories, as set out in the Datacall User Guide, will continue; but
- Excepting as noted on the following slides

Three new types of ineligible costs



1. Costs related to transition

2. Costs related to service level changes approved after August 14, 2017 (the release date of Minister's requirement letter)

- 3. Costs related to contract operations and management deficiencies
 - i.e. Penalties or fees incurred as result of service level failure credits, default or similar actions levied by contractor on community



Examples of ineligible transition costs include:

- Activities undertaken in anticipation or preparation for transition
- Penalties or fees incurred to terminate contracts to facilitate transition
- Decommissioning, transferring, selling or otherwise disposing of assets associated with transition
- Amortized capital costs that extend beyond transition date
- Severance or other employee termination-related costs related to transition



Examples of ineligible post-August 14, 2017 service level changes include increased costs resulting from:

- Changes in the frequency of service
- Shift from multi-stream to single stream and vice versa
- Shift from depot to curbside collection
- New collection containers or carts (excluding replacements)

Outcome of proposed payment approach



 Moves from complicated cost containment formula and the municipal funding allocation model (MFAM) to straight 50% on verified eligible costs

• Conventions for reporting remain largely the same (i.e. through the RPRA Datacall)

 90% of communities in Datacall will be receiving more money that they were under previous method Consultation questions: Proposed payment approach for non-transitioned communities



 Do you agree with the outcomes of the proposed approach for non-transitioned communities? Are there other outcomes you would like to see added?

• Do you support the proposed method of calculating payments to non-transitioned communities? If not, what approach would you prefer we consider?

• Do you support the proposed set of <u>eligible</u> costs? If not, what approach would you prefer we consider?

Consultation questions: Proposed payment approach for non-transitioned communities



 Do you support the proposed set of ineligible costs? If not, what approach would you prefer we consider?



THE TRANSITION MECHANISM
Minister's request



- Identify when and how the responsibility for the collection and management of PPP will be transferred smoothly from communities to Stewardship Ontario.
- "Providing choices for municipalities where Stewardship Ontario is to provide blue box services (i.e. transitioned communities):
 - These municipalities will decide whether they wish to act on behalf of Stewardship Ontario for the procurement and contract oversight of PPP collection services, and
 - These municipalities should also have an opportunity to participate in the post-collection management of PPP collected"

Objectives of proposed approach



- Provide communities with a right of first refusal to act as collection contract managers or deliver collection themselves where they do so today
- Provide communities the opportunity to participate in the post-collection competitive procurement process
- Sufficient notice to service providers to make necessary financial and operational preparations
- Avoid stranded assets to the extent possible
- Ensure a seamless and orderly transition of the Blue Box Program to full producer responsibility



Communities may transition by satisfying one of the following criteria:

- 1. All contracts for collection and/or management of PPP have expired such that the community is unencumbered by agreements;
- 2. All contracts for collection and/or management of PPP have been terminated early such that the community is unencumbered by agreements; or
- 3. A community self-delivers service (i.e. does not have contracts for collection and/or management of PPP)

4th transition mechanism proposed by some communities and service providers



Scenario: A collection contract expires sometime after its processing contract has expired:

- Stewardship Ontario enters into agreement with a community for the community to act as collection contract manager and meet prescribed performance standards;
- Community amends existing agreement with collection service provider to embed new performance standards
- Stewardship Ontario pays the community a price established through benchmarking of services (price offer established early to aid community decision-making)
- Once the term of original contract expires the collection service is retendered



Communities must provide notice, as follows:

- 1. One year where a community exercises right of first refusal (RoFR) to be a collector under contract to Stewardship Ontario; or
- 2. Two years where a community declines RoFR to act as a collector to Stewardship Ontario and intends to have Stewardship Ontario deliver collection services directly to residents.

Why two years where Stewardship Ontario delivers collection services?



- Prepare and issue a post-collection tender
 - In coordination with the host community
- Establish the administration to oversee the collection service provider and protocols and procedures (inspections, audits, etc.) to ensure compliance with the terms of its agreement with Stewardship Ontario
- Coordinate collection and post-collection activities
- Establish P&E delivery at the household level

Transition support will be available



- Scenario: Where a community's collection contract is set to expire but processing contract continues and collection service providers cannot/will not roll forward year-to-year
- Stewardship Ontario will work with the community to competitively procure long-term collection service comprised of two sets of terms and conditions:
 - A set of terms and conditions for status quo collections under shared responsibility for the period until the processing contract expires; and
 - A set of terms and conditions for the subsequent period as a transitioned community.

Pacing the transition to ensure operational stability



Criteria One : All contracts for collection and/or management of PPP have expired such that the community is unencumbered by agreements	Upon satisfying Criteria One communities may transition with no upper limit to number of transitioning communities.
Criteria Two : Contracts for collection and/or management of PPP have been terminated early such that the community is unencumbered by agreements	Communities wishing to transition under Criteria Two (early termination) will be selected by random lottery and capped once the total cost of transitioned communities has reached 20% of the 2016 annual net costs or an absolute number of communities transitioning is met.
Criteria Three : A community self-delivers service (i.e. does not have contracts for collection and/or management of PPP)	Communities that satisfy Criteria Three may transition with no upper limit to number of transitioning communities. 44

Consultation questions on proposed transition mechanism



- Do you agree with the objectives of the proposed <u>approach</u> for transition criteria? Are there other objectives you would like to see added?
- 2. Do you support the proposed three transition <u>criteria</u>? If not, what approach would you prefer we consider?
- 3. Do you support the fourth transition mechanism proposed by some communities and private sector companies? If not, what approach would you prefer we consider?
- 4. What kind of contract expiry scenarios do you anticipate? Would you support implementing yearly rolling collection contracts where there is a-synchronous contract expiry? If not, what approach would you prefer we consider?

Consultation questions on proposed transition mechanism



5. Would you support the proposed methods for pacing transition to ensure operational stability and no service disruption as communities transition. This may include:

- lottery for communities wishing early termination,
- yearly cap on transitions once costs have reached 20% of the 2016 net cost,
- an absolute number of transitioning communities is met.

If not, what approach would you prefer we consider?

6. Would you support the proposed notice periods for communities that wish to transition? If not, what approach would you prefer we consider?

Questions?







PROPOSED PROCUREMENT OF COLLECTION SERVICES

Objectives of proposed approach



Promote competition by ensuring a fair and open marketplace

Facilitate cooperation among the various parties

Provide communities with the choice to provide collection services, or not



Three scenarios are proposed for procuring and paying for collection services in transitioned communities:

- 1. A community chooses to act as an agent to tender collection and manage contracts on behalf of Stewardship Ontario
- 2. A community self-delivers collection using its own capital and labour; or
- 3. A community hands over collection tendering and contract management to Stewardship Ontario.

Scenario 1: Agent for Stewardship Ontario



For curbside and multi-family:

- Where a community incorporates Stewardship Ontario's performance standards and bid requirements into their competitive procurement, Stewardship Ontario will pay the prices charged by the successful proponent for services.
- Where a community deviates from Stewardship Ontario's performance standards and bid requirements (e.g. bundled bids, additional service requirements, etc.), Stewardship Ontario will pay based on ground-truthing against benchmarks.

For depots:

• Depots will be paid on a per tonne basis (using historic cost as a basis) to collect PPP that meets a quality standard.



For curbside and multi-family:

• Where the community is self-delivering the collection services, Stewardship Ontario will pay a price based on a benchmark.

For depots:

 Depots will be paid on a per tonne basis (using historic cost as a basis) to collect PPP that meets a quality standard.



- Where a community does not wish to collect, Stewardship Ontario will issue a collection tender.
- Private depots will be paid to collect PPP that meets a quality standard.

Examples of curbside and multi-family performance standards for collection services (1 of 2)



 Deliver a defined collection service (i.e. curbside, multi-family, depot collection, or some combination thereof) to a specified area

Collect the standard list of PPP

- Collect in a prescribed manner:
 - Without limit on the quantity of in-scope PPP collected
 - Where it is to be collected
 - Minimum and maximum collection frequencies
 - Compacted in collection vehicles at a maximum ratio

Examples of curbside and multi-family performance standards for collection services (2 of 2)



- Ensure orderly, non-disruptive, and quiet operations
- Provide collection containers to residents
- Monitor the quality of PPP set out for collection (i.e. maximum percentage by weight allowable non-PPP)
- Ensure delivery of the collected material to the postcollection facility within a predetermined radius or drivetime
- Provide residents with call centre services to receive and action complaints and issues
- Participate in the reporting process

Examples of curbside collection contractor administration



- Oversee the contracted collector to ensure its adherence to the performance standards
- Where non-PPP exceeds the maximum threshold, work with contractor to implement remedial measures
- Deliver prescribed P&E and ensure the contractor executes any P&E related tasks in its agreement with Stewardship Ontario

Payments for collection services delivered by communities



- Payment terms for services (e.g. per household) to communities resulting from procurement or benchmarking
- Payment for collection contract administration
- Payment for P&E undertaken by the community on behalf of Stewardship Ontario.
- Financial top-ups or bonuses for achieving specified performance metrics (i.e., further reductions in non-PPP below maximum thresholds)
- Penalties for failing to meet specified performance metrics (e.g., exceeding maximum non-PPP thresholds)

Consultation questions on: Proposed approach for procurement of collection services



1. Do you agree with the objectives of the proposed approach for collection services procurement? Are there other objectives you would like to see added?

2. Would you support the three proposed collection procurement scenarios? If not, what approaches would you prefer we consider?

Questions?







PROPOSED PROCUREMENT OF POST - COLLECTION SERVICES

Minister's Request



• Stewardship Ontario establish a fair and open marketplace for the provision of Blue Box services

Objectives of proposed approach



- Provide adequate lead-time for interested operators to participate in open tenders
- Promote competition by ensuring a fair and open marketplace
- Facilitate cooperation among the various parties
- Ensure the post-collection system evolves in a manner that optimizes the consolidation, transfer, processing and marketing of PPP
- Provide post-collection operator opportunity to propose comprehensive solutions

Examples of post-collection management activities



- Receive PPP from vehicles from collectors
- Pick up PPP from depot collectors
- Consolidate and transfer PPP from collectors where required
- Prepare and transfer PPP for shipment to end-markets or downstream processors (as required)
- Market PPP to end-markets
- Appropriately manage residual materials
- Track materials received and shipped by the processor to approved end markets
- Report to Stewardship Ontario as required

Competitive procurement of postcollection services



• Private sector companies as well as municipalities and First Nations communities will have opportunity to participate in competitive process.

 While communities will have first right of refusal to act as collectors, they will not be offered such rights for post collection, but they will be free to bid on providing these services, or perhaps participate as part of a coalition.

Procurement of post-collection services process



- Step 1: Request for Expressions of Interest (REOI) to PPP processors to gauge processors' capacity to receive, process and market a defined list of PPP received from collectors
- Step 2: Request for Proposals (RFP) to PPP processors that are able to manage the defined list of PPP
 - Processors will be provided with details of the collection network in order to support the development of their bids

Consultation questions on proposed approach to procurement of post-collection services



 Do you agree with the objectives of the proposed approach for procurement of post-collection services? Are there other objectives you would like to see added?

2. Would you support the proposed post-collection procurement approach? If not, what approach would you prefer we consider?

Questions?







EXPANSION OF SERVICES: PROPOSED APPROACH



- Stewardship Ontario to propose a timeline for offering collection services to multi-family residential buildings that are not serviced by municipalities and First Nations communities.
- Consider accommodating associated public spaces, parks and other related services provided by communities.
- Consider expanding collection services over time to communities not currently serviced.



 Prioritize the transition and stabilization of existing recycling systems before expanding to new services

 On-board multi-family buildings in a manner that is scalable and reflects Stewardship Ontario's ability to influence building owners' participation in the Blue Box Program



- Once the program has stabilized, collectors would be eligible to receive a payment per multi-family household serviced if:
 - Qualification requirements are met
 - Multi-family residents deliver PPP to an accessible central storage area
 - Collector has written agreement with the building manager to gain access to the storage area
- Payments set to provide meaningful incentive to establish long-term relationships with multi-family property managers taking into account observed market pricing for comparable services



 Prioritize the transition and stabilization of existing recycling systems before expanding to new services


 Stewardship Ontario will evaluate public space recycling provided by communities that provide collection services to Stewardship Ontario

 Stewardship Ontario will set criteria that must be met to ensure success (i.e. collected volumes do not degrade quality of materials collected in other channels)

Objectives for service expansion to new communities



 Prioritize the transition and stabilization of existing recycling systems before expanding to new services

 Ensure necessary quality and cost controls are in place



- Stewardship Ontario will set conditions in the a-BBPP to be met before it expands service to new communities such as:
 - There is necessary infrastructure to service the community (e.g., road access, depot facilities)
 - There is expressed willingness by the community and its residents to participate in the Blue Box Program

Adding new depots in service expansion communities



- Offer payments to depot collectors that are able to comply with the collector qualification standards.
- Depot operators must meet performance standards that include at a minimum:
 - PPP to be collected
 - Minimum number of weekly operating hours
 - Method by which collected PPP will be prepared for pick-up for introduction into the post-collection management system; and
 - Maximum percentage by weight allowable non-PPP in collected PPP.

Consultation questions on proposed approach to expansion of services



77

Do you agree with the objectives of the proposed approach to expansion of services to:

- multi-family buildings?
- public spaces?
- new communities and through new depots?

Would you support the proposed approach to expansion of services to:

- multi-family buildings?
- public spaces?
- new communities and through new depots??

If not, what approach(es) would you prefer we consider?

Questions?







ENGAGEMENT AND CONSULTATION



- The <u>Stakeholder and Indigenous Peoples Engagement</u> and <u>Communications Plan</u> jointly prepared by Resource Productivity & Recovery Authority (the Authority) and Stewardship Ontario is now available.
- Phase 1: Begins with modular consultations with individual groups to discuss and gather feedback on proposed features of particular interest to them.
- Two modules for municipalities and First Nations communities:
 - Module 1 October 12: Proposed transition process including eligibility criteria and proposed service procurement.
 - Module 2 October 27: Definitions and performance requirements for the transitioned recycling system.

Timeline for consultations







- A series of local consultations and engagement meetings with interested communities will be held throughout the province in November:
 - Southwestern Ontario
 - Greater Hamilton Area
 - Eastern Ontario
 - Central Ontario
 - Northwestern Ontario
 - Northeastern Ontario

London, November 15 Hamilton, November 10 Perth, November 13 Bracebridge, November 9 (tbc) Thunder Bay November 22 Sudbury, November 21

Watch for an invitation next week



- The Authority and Stewardship Ontario will release a full draft of the a-BBPP proposal by December 22, 2017
- Consultation webinars for stakeholders will be held on January 8 and written feedback will be requested by January 15
- a-BBPP must be approved by the Stewardship Ontario Board and the Authority and submitted to Minister by February 15th 2018 deadline, along with a Consultation Report
- All consultation materials, including webinars and associated slide decks will be posted



- Do you agree with the approach being taken to stakeholder consultation?
 - If no, what approach would you prefer we consider that would enable the proposal for an a-BBPP to be submitted to the Minister by the February 15th timeline?



NEXT STEPS



- At our next meeting on October 27th we will discuss and request feedback on:
 - Proposed definition of obligated packaging and paper product
 - Proposed standardization of targeted materials for collection
 - Proposed targets
 - Proposed collection and post-collection material management standards



- All meeting materials, including this webinar will be posted here: <u>http://stewardshipontario.ca/a-bbpp</u>
- Online "Survey Gizmo" Consultation Workbook will be emailed to you
 - The "Workbook" will contain information provided to you today accompanied by questions inviting your responses.
 - Your feedback will be carefully considered as the draft a-BBPP is developed
 - Please submit your feedback by November 17, 2017



For project updates and to submit questions and comments, please visit:

http://stewardshipontario.ca/a-bbpp

