

November 27, 2019

Jamie Haldenby
Program Management Branch – Program Oversight
40 St. Clair Avenue West, 4th Floor
Toronto, ON M4V 1M2

Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Dear Mr. Haldenby,

Re: Changing the Mandate of the Resource Productivity and Recovery Authority

The Region of Peel thanks the Ministry of the Environment, Conservation and Parks for the opportunity to provide comments on the proposal to change the mandate of the Resource Productivity and Recovery Authority (ERO Number 019-0671).

In general, Peel supports the proposal to change the mandate of the Resource Productivity and Recovery Authority (RPRA). Peel also strongly supports RPRA's continuing role in oversight and enforcement.

Peel supports the province's efforts in gathering waste related data and has called for the province to collect better data.

Expanding RPRA's mandate to include digital reporting services, fee setting and cost recovery for waste outside of their current mandate improves the efficiency and accuracy of data and reduces the administrative burden for organizations, including municipalities, that manage these materials. It will also provide the province with access to much needed data.

Allowing RPRA to set and collect fees for digital reporting services for new programs they take on is reasonable to ensure these reporting services are performed adequately. The process to set these fees should be transparent and consider input from all stakeholders.

The proposal to amend the Waste Diversion Transition Act to allow the transfer of residual surplus funds left at the end of a program transition from an Industry Funding Organization (IFO) to RPRA is reasonable but these funds should be used in a manner that benefits Ontario's citizens and advances waste reduction and resource recovery in the province. To ensure this, the amount of funds remaining after a program transition should be published and the use of these surplus funds should be transparent and consider input from all stakeholders.

One of the most significant issues with the previous legislation was that Waste Diversion Ontario did not have the necessary resources or powers to adequately oversee IFOs.

The new legislation and the establishment of RPRA addresses these issues. Peel is a strong supporter of RPRA's having a strong oversight and enforcement role and would caution against any changes that would diminish RPRA's role or powers of oversight and enforcement.

Sincerely,



Norman Lee
Director
Waste Management
Region of Peel

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