Ministry of the Environment, Conservation and Parks

Modernizing Hazardous Waste Reporting in Ontario

Discussion Paper

Ontario

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1. Introduction

Delivering Simpler, Faster, and Better Services to Ontarians

The Ontario government is taking steps to create a more competitive business environment by removing costly or inefficient processes and red tape, creating a more prosperous economy for all Ontarians.

In support of this effort, the Ministry of the Environment, Conservation and Parks (the ministry) is consulting on proposed regulatory, guidance, and reporting service changes to improve the Hazardous Waste digital reporting service. The feedback we receive will be used to inform regulatory and program changes that support the modernization of digital reporting services.

We have heard that the current reporting service is difficult to use, resulting in most reports being submitted using paper. This needs to change.

To make reporting simpler, faster and more cost-effective, we are proposing a new digital reporting service that would modernize how hazardous waste is managed in Ontario. This new digital reporting service would align with Ontario's Digital Service mandate by eliminating outdated approaches to processes, such as reporting using the existing inefficient online system (i.e. Hazardous Waste Information Network - HWIN) and paper-based submissions (e.g. paper manifests) that prevent the delivery of people-centred services.

Our proposed solution

We are modernizing the Hazardous Waste program and transitioning the development of a new digital reporting service to the Resource Productivity & Recovery Authority (RPRA). The Minister issued a written direction letter to RPRA to establish a digital reporting service for the Hazardous Waste program. The new digital reporting service would align with the Open for Business Red Tape strategy by making it easier for the regulated community to track and report on waste.

As a key commitment of our Made-In-Ontario Environment Plan, Ontario is working to keep our land and water clean by taking strong enforcement action to ensure waste and hazardous waste is properly stored, transported, recycled, recovered or disposed. The new Hazardous Waste digital reporting service would align with the Made-in-Ontario Environment Plan by modernizing the way that the regulated community tracks and reports on subject waste (i.e. hazardous waste and liquid industrial waste as defined in Regulation 347 of the Environmental Protection Act). A better digital reporting service will enable more efficient and timely compliance

monitoring and enforcement actions, which would provide assurance for Ontarians that polluters are held accountable, and subject waste is being appropriately and safely managed.

Definitions

Load Refusal or Refusal Report is completed when a receiver refuses to accept a shipment of waste, the receiver must fill out a Load Refusal Report to explain the reason for the refusal and the destination of the refused load. A copy of this report must be returned to the Director within three working days of the load's refusal.

Manifests are documents that describe the type and amount of waste that has been moved, who generated it, who moved it, as well as who received it.

Subject waste is a term used to identify the types of waste that must be registered with the ministry. It includes:
- liquid industrial waste
- hazardous waste, including hazardous waste treated to remove characteristic hazards such as reactivity and ignitability

Discussion Paper Objectives

The ministry is looking to better understand the impacts of modernizing the Hazardous Waste digital reporting service on the regulated community, to ensure hazardous waste reporting is easier and more efficient for everyone.

This discussion paper outlines some proposed changes to Regulation 347 and the Registration Guidance Manual for Generators of Liquid Industrial and Hazardous Waste; as well as recommendations on a new regulation under the Resource Recovery and Circular Economy Act (RRCEA) and reporting service changes. These changes would support moving to a modern digital reporting service delivered by RPRA. RPRA is a non-Crown and not-for-profit corporation that is constituted under the RRCEA.

This discussion paper is intended to provide Ontarians with an opportunity to participate early in the regulatory development process. Throughout this discussion paper, we have included questions for your consideration and feedback. We are looking for your advice on how we can best implement these changes.

Hazardous Waste Program Background

Mandate

The Hazardous Waste program provides oversight to ensure subject waste generated, stored, processed, treated, disposed, transported, or re-used in Ontario is safely managed in a way that supports the ministry's mandate to protect human health and the environment.

Legislative and Regulatory Framework

Ontario has a comprehensive legislative and regulatory framework to ensure that subject waste is managed in a way that protects the environment and human health. This framework is set out in the Environmental Protection Act (EPA) and Regulation 347, which establishes rules for managing subject waste. It provides the ministry with the ability to regulate and enforce cradle-to-grave management of subject waste throughout Ontario, including collection, storage, transportation, treatment, recovery, recycling, and disposal. An extensive guidance manual provides the regulated community with further clarification on the rules and requirements to safely manage subject waste.

The Hazardous Waste program also regulates the management of subject waste that is generated outside of Ontario, but is treated, stored, processed, disposed of, or re-used inside Ontario. Waste transported across interprovincial, inter-territorial, or international boundaries must also comply with federal and other applicable jurisdictional regulatory requirements.

Regulated Community

The Hazardous Waste program is divided into three regulated groups:

- Generators – operators of facilities or sites that generate subject waste, including those that generate subject waste onsite, and those that collect subject waste from other generators for processing and/or disposal (transfer stations).
- Carriers –ministry-approved operators of waste management systems that transport subject waste to a receiver.
- Receivers – the operators of any ministry-approved facility that receives subject waste from a generator. This includes transfer stations, processing facilities, and disposal sites.

Businesses (representing generators, carriers, and receivers) report on approximately 40,000 generator sites each year in Ontario.
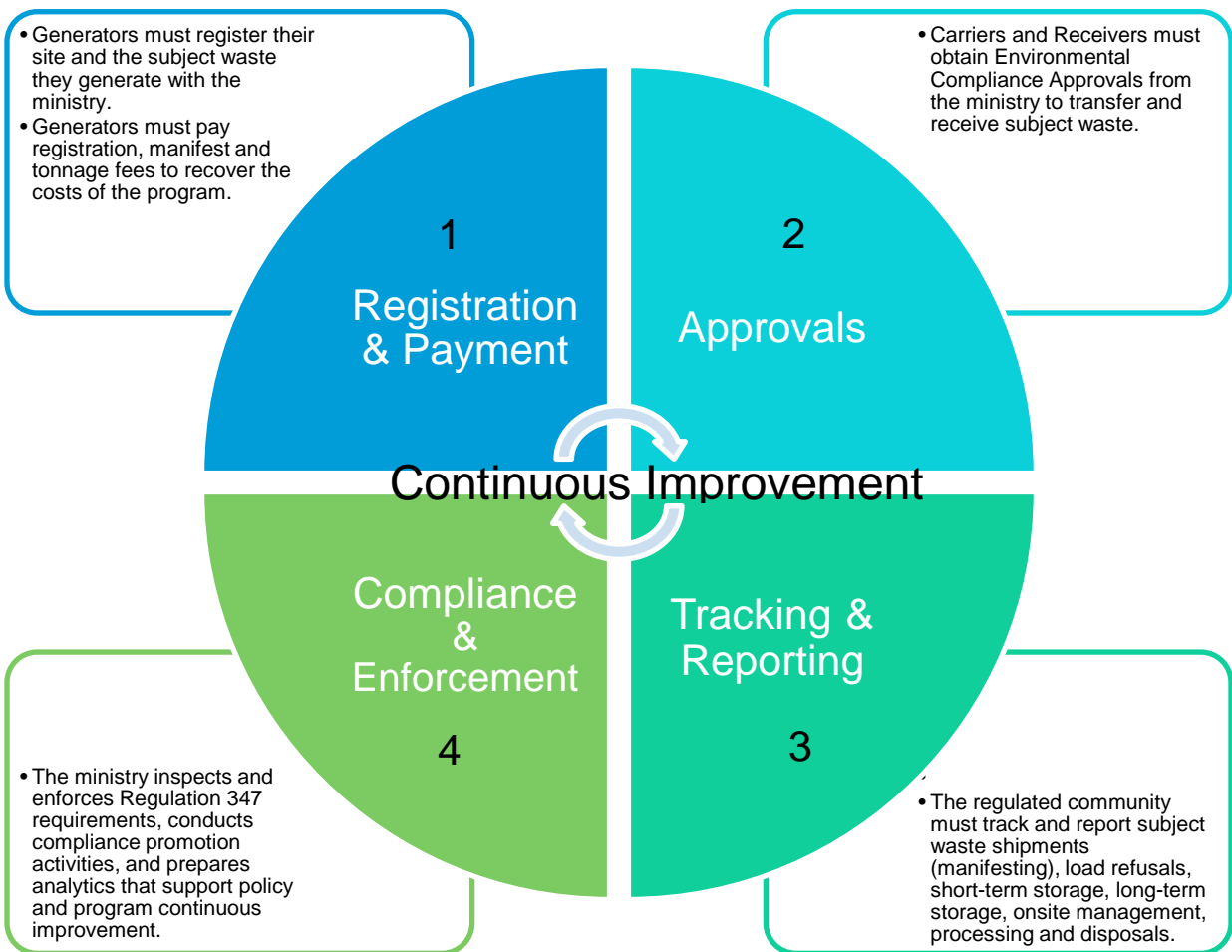
Program Components

The Hazardous Waste program is made up of four key components (Figure 1):

1) Registration & Payment,
2) Approvals,
3) Tracking & Reporting, and
4) Compliance & Enforcement.

The ministry evaluates program performance and recommends changes to ensure continuous improvement of the program.

Figure 1: Hazardous Waste Program Components

- Generators must register their site and the subject waste they generate with the ministry.
- Generators must pay registration, manifest and tonnage fees to recover the costs of the program.

- Carriers and Receivers must obtain Environmental Compliance Approvals from the ministry to transfer and receive subject waste.

1 Registration & Payment

2 Approvals

Continuous Improvement

Compliance & Enforcement 4

Tracking & Reporting 3

- The ministry inspects and enforces Regulation 347 requirements, conducts compliance promotion activities, and prepares analytics that support policy and program continuous improvement.

- The regulated community must track and report subject waste shipments (manifesting), load refusals, short-term storage, long-term storage, onsite management, processing and disposals.

1. **Registration & Payment**
   Generator registration allows the ministry to understand where subject waste is being generated, stored, processed, or disposed of in Ontario. The payment of fees is necessary to ensure that the costs to administer the program are recovered from the businesses that generate the subject waste. This helps to ensure that the general public is not responsible for the costs to oversee the management of subject waste generated by the regulated community.

2. **Approvals**
   [Environmental Compliance Approvals](#) are necessary for storing, managing, transporting, processing, or disposing of specific types of subject waste. These approvals ensure Carriers and Receivers are able to safely transport and manage each type of subject waste prior to taking on this responsibility.

3. **Tracking & Reporting**
   Tracking & Reporting are key components of the Hazardous Waste program because they follow subject waste from the point at which it is generated, to the point at which it is disposed or treated. This information is then used by the ministry to evaluate and develop programs and policies that help to ensure the safe management of subject waste in Ontario.

4. **Compliance & Enforcement**
   The ministry is responsible for monitoring and enforcing compliance with legislative and approval requirements to ensure safe management of subject waste in Ontario. In this role, the ministry uses registration, approvals, tracking and reporting information to develop and implement, risk-based approaches to improve compliance and evaluate the effectiveness of environmental performance of the regulated community.

Current Reporting Framework

Subject waste generators register and report to the ministry by completing a 'Generator Registration Report' either through HWIN, or through paper document submissions. The HWIN system is an online platform implemented in 2002 with the objective to make it easier for the regulated community to register and report on subject waste activities online. The HWIN system collects and stores information, such as generator site information, waste profiles (i.e. information about the waste), waste management reports (i.e. reports about storage, processing, disposal onsite), and off-site tracking (i.e. documenting the movement of waste from a generator to a receiver using a manifest). It is also used to calculate, collect and process hazardous waste fees.

The regulated community can currently choose to notify the ministry of their off-site tracking activities by using the electronic HWIN system or by filling out paper forms (e.g. paper manifests) and mailing them to the ministry. Electronic manifests automatically update within HWIN, whereas information from paper manifests must be manually entered into HWIN by ministry staff upon receipt. Some reporting, such as that completed for short term storage, can only be mailed to the ministry as paper forms because HWIN system does not have this functionality.

Most reports are waste manifests, which are completed on paper and mailed to the ministry. The ministry has heard from the regulated community that the HWIN system is difficult to use, resulting in most manifests being submitted on paper. This amounts to over 450,000 paper reports that require completion and submission by generators, carriers, and receivers, as well as manual processing by the ministry every year.

To make reporting easier, the ministry is replacing the current HWIN system with a new hazardous waste digital reporting service, which will be developed and delivered by RPRA.

Recent Changes

The RRCEA and EPA were recently [amended](#) to allow RPRA to provide digital reporting services, fee setting and fee collection for a wider range of waste and resource recovery programs. A new digital reporting service for the Hazardous Waste program will save businesses time and money. The ministry would maintain compliance, enforcement, and oversight of the Hazardous Waste program. RPRA would be responsible for operating the digital reporting service, providing the platform for the regulated community to submit their program reports, ensuring reports are complete, and setting and collecting fees. The new reporting service is anticipated to begin onboarding users in 2021 with an official launch on January 1, 2022.

Changes to Regulation 347 are needed to allow RPRA to operate the new modern Hazardous Waste digital reporting service. A description of these proposed changes will be included throughout this discussion paper.

Hazardous Waste Digital Reporting Services Project

Goals

The goals of the Hazardous Waste digital reporting service modernization project are to:

1. **Go digital** – implementing a modern digital reporting service that replaces the existing paper-based manifest program will improve our existing service and knowledge base, making it easier to report subject waste activities.
2. **Hold polluters accountable** – implementing a modern digital reporting service will allow for more effective and timely compliance monitoring and enforcement actions.

By 2024, the ministry would like to see over 95 per cent of the regulated community using RPRA's new electronic reporting service for manifesting, with less than 1 per cent system and administrative errors.

Scope

The scope of changes for this project includes only those regulatory or program changes that support the modernization of the Hazardous Waste digital reporting service and overall project objectives.

Benefits

Implementing a modern digital reporting service is beneficial for both businesses and the ministry. Improved electronic data tracking and reporting will provide the regulated community and the ministry with a tool that reduces administrative burden, saving time and money. For example, the service will:

- reduce unnecessary manual data entry;
- reduce the amount of time and money businesses spend preparing and mailing paperwork to the ministry, correcting administrative errors, or searching for missing paperwork;
- provide the ministry with more accurate and timely information to inform decision making; and
- allow the ministry to focus on risk-based compliance and enforcement to ensure subject waste is appropriately managed.

Making Reporting Easier

The new reporting service will be designed, built, and delivered by RPRA based on program specifications established by the ministry, and will include:

- o customer support,
- o payment processing,
- o integrated program reporting, and
- o continuous improvement.

The new reporting service will provide the regulated community and the ministry with a single online access point for completing most Hazardous Waste program reporting requirements and retrieving reported information. It will also provide mobile and tablet application for flexibility, as well as better notifications to improve data quality.

2. Proposed Changes to Modernize Ontario's Hazardous Waste Digital Reporting Service

Proposed Changes

The ministry is proposing to make the following regulatory amendments to transition digital reporting services to RPRA, as follows:

- Amend Regulation 347 to:
  - o Require the regulated community to provide reporting information (i.e. registration, waste manifesting, short term storage notifications, etc.) to RPRA instead of the ministry.
  - o Change registration and reporting requirements (i.e. manifesting, short-term storage notifications, etc.) to support electronic service delivery.
- Draft a new regulation under the RRCEA to:
  - o Carry over a fee exemptions framework, which will maintain the current fee exemptions, so that RPRA can continue to observe them in the new reporting service.

Government will continue to play an important and on-going role in protecting the health and safety of the people of Ontario, and the environment. This means that for the Hazardous Waste program, the ministry will maintain compliance and enforcement, and program and policy oversight.

RPRA would be responsible for operating the digital reporting service to ensure reports are complete and related fees are collected, however all non-compliance with the reporting service requirements will be forwarded to the ministry for follow-up.

The ministry will continue to ensure all generators, carriers, and receivers are complying with the requirements under the EPA and Regulation 347 to safely store, transport, process, and manage subject waste in Ontario. The ministry will do this by conducting compliance inspections and following up on reported incidents of improper management of waste. The ministry will also continue to enforce the requirements through investigations and prosecutions.

The ministry is also considering some further regulatory, guidance, and reporting service changes to address:

- Registration & Payment
- Tracking & Reporting; and
- Transition Planning

We are looking forward to hearing your feedback on these proposals.

Registration & Payment

Registration and Renewal

There are currently over 40,000 generator sites registered in HWIN each year. The Generator Registration Report is lengthy, and, in some cases, information requested is duplicated on other hazardous waste reporting forms (e.g. manifests, short-term storage reports). The need for an annual registration renewal may result in the collection of information from some businesses that are not currently generating or storing subject waste and should not be required to update their Generator Registration Report. For example, there are years where certain businesses may not generate, store or move subject waste, yet they still renew their registration and pay a fee by February 15th of each year.

The ministry is exploring ways to eliminate unnecessary reporting by removing the annual registration renewal requirement (currently between January 1st to February 15th) and only collecting information from generators at the time the business has an activity to report (e.g. storage, onsite processing, or movement of subject waste). This would mean in the new digital reporting service, businesses would register when they are reporting their first activity (e.g., registration information would be

collected from the first shipment or manifest report). To ensure accuracy, businesses would be prompted to verify their previously reported registration information when they are reporting their first activity 365 days after their last registration.

For example, in the new digital reporting service, if a business is storing subject waste for over 90 days (i.e. short-term storage), they could now submit their first short-term storage notification report as part of their registration. This removes a duplicative requirement to provide basic generator information in multiple reports.

Similarly, the business could also provide their registration information while completing an electronic manifest for their first shipment of subject waste or while notifying the ministry of on-site storage or processing activities. This means that if this business is not storing, processing, or moving subject waste, then they would not be required to verify their registration information until the next time they perform one of these activities (after 365 days past the last registration). This means businesses do not need to enter information and pay fees when they are not performing any activities.

This proposed change would reduce the amount of reporting duplication for businesses. It also helps the ministry more accurately track the actual storage, processing, movement, and disposal of subject waste in Ontario.

Delegating Authority

The ministry has heard from generators that they would like to have the ability to delegate authority to others (e.g. consultants, service providers, waste management companies etc.) to complete their reporting requirements for them. The ministry is exploring ways to allow a delegate to register, report, and pay fees on behalf of a generator while still ensuring the generator is responsible for the subject waste that they generate; and confidential business information is protected. This will help to ensure the most accessible, knowledgeable and capable individuals are able to act on behalf of a business, should it be needed.

Registering Under the New Digital Reporting Service

The recent changes to the RRCEA create the ability for RPRA to oversee the Hazardous Waste program reporting, including setting and collecting fees. Should the ministry proceed with the proposed regulatory changes, reporting information will not be accepted in the new digital reporting service unless the entire online form is complete and payment is received from the business (or their delegate), or a regulatory exemption is approved by the ministry. This will help ensure all users of the digital reporting service are providing accurate information and paying for the subject waste that they generate in a timely manner.

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Confidential Business Information

The recent [changes](#) to the RRCEA further clarify that confidential business information is protected. RPRA follows an [Access and Privacy code](#) that protects commercially sensitive and personal information while conducting business operations, performing regulatory functions, and allowing access to public information. The ministry is exploring whether a supporting regulation would assist in defining these requirements further. RPRA also follows all confidentiality of information requirements in the RRCEA to ensure the proper handling of information.

Maintaining Current Fee Exemptions

The ministry intends to maintain all existing fee exemptions stated in Regulation 347. We are proposing to move these exemptions to a new regulation under the RRCEA. The RRCEA allows RPRA to set and collect fees. Fee exemptions need to be moved to a new regulation under the RRCEA to ensure they can be maintained by RPRA in the new reporting service.

Maintaining Full Cost Recovery for the Hazardous Waste Program

Currently businesses pay a $50 registration fee when they first register and continue to pay this fee annually when they renew their registration. Also, businesses pay $5 per manifest to move subject waste, and $30 per tonne of hazardous waste generated.

In 2016 and 2017, the tonnage fee was increased to move the Hazardous Waste program toward full cost recovery and ensure businesses pay for the costs to manage the waste they generate.

Future Hazardous Waste program fees will be set by RPRA and will be based on the costs to develop, implement, and maintain the digital reporting service for the program and the cost for the ministry to oversee compliance and enforcement, as well as policy and program activities. The Hazardous Waste program will continue to operate as a full cost recovery program with all RPRA and ministry costs being recovered from the hazardous waste fee and collected by RPRA through the new digital reporting service.

RPRA follows a [General Fee Setting Policy](#) and will be consulting with Hazardous Waste program stakeholders prior to establishing or amending fees. Before RPRA can establish or amend fees, it is required under the RRCEA to consult with stakeholders. RPRA must also post any fee proposal on its website for public comment for at least 45 days. Following public consultation, RPRA must post the

final fee on their website along with how they considered the consultation comments. The fee would then come into effect 30 days after its publication, or on a later date specified RPRA.

Location and Business Information

The ministry is proposing to make improvements to the location and business identification information collected as a part of the registration process. A tool may be introduced in the new digital reporting service to help businesses properly report their site location (e.g. latitude and longitude; UTM - Universal Transverse Mercator coordinate system; Address). In addition, businesses may be required to enter their Canada Revenue Agency Business Identification Number (or equivalent for generators that are out of country), so all ministry activities related to that site location can be connected (e.g. Environmental Compliance Approvals, Environmental Activity and Sector Registry, other reporting, etc.).

This proposed change would make it easier for businesses to accurately reflect who they are and where their subject waste is located. This would also help the ministry to gather more accurate information about where subject waste is generated, stored, processed, transported, and disposed in Ontario. This allows the ministry to gain a more thorough understanding of the waste activities and risks existing at certain locations or presented by certain entities.

Registration & Payment - Discussion Questions

In addition to comments or recommendations on the sections outlined above:

1. How can we ensure generators are aware of their regulatory obligations (i.e. registration and reporting on storage, processing and movement of subject waste) even when they have chosen to delegate registration and reporting requirements to another individual or organization?
2. Generators must maintain records of all data, analysis, and other information used to register subject waste.
   a) Now that businesses are moving digital, should we allow supporting records (e.g. data, analysis and other supporting information used in the preparation of the Generator Registration Report) to be kept electronically? Are paper copies needed?
3. Currently spills and emergency reporting is managed through the Spills Action Centre. How should we manage registration for emergency situations going forward?

Tracking & Reporting

Subject Waste Activity Reporting

Manifests are one of the key ways the ministry can track how subject waste is moved throughout Ontario. A manifest document describes the type and amount of waste that has been moved, who generated it, who moved it, as well as who received it. Currently the ministry receives over 450,000 paper-based manifest copies each year. The ministry has heard from businesses that the paper-based manifests are burdensome and hard to manage. Businesses have opted to continue to use paper manifests over the current HWIN electronic manifesting system because the HWIN electronic manifesting system is difficult to use and relies on outdated technology.

A new modern digital reporting service for the Hazardous Waste program would include electronic manifests, refusal reports, short term storage notices, and on-site management reports. This would provide one place where businesses can go to complete all their subject waste activity reporting. It will also make reporting information more accessible and easier for both the ministry and businesses to take action.

Improving Data Quality

The manifest process in the proposed new digital reporting service would be improved by including notifications and reminders to ensure reports are accurate prior to electronic sign-off. This would give users the information they need to complete their reporting right the first time, and minimize the chance for administrative errors, lost or damaged paperwork, missing or inaccurate information on mandatory fields, missed signatures, etc. The proposed new digital reporting service would also be capable of providing timely feedback on regulatory compliance issues ensuring that when a generator selects a waste carrier that the carrier is approved to transport or receive waste.

Currently generators are required to provide an estimate of the quantity of waste being shipped for storage, processing, or disposal on the waste manifest. Some generators do not have access to a scale to measure the actual quantity of their subject waste. The quantity measured by the receiver is taken as the final official shipped quantity. There is often a significant difference between the estimated quantity leaving the generator's site and the quantity being received by the receiver. The ministry is looking for recommendations to improve this process in the proposed new digital reporting service.

Manifest Corrections

The current manifest correction process is burdensome. Under the current process, a correction notice must be submitted to the ministry on paper and the approval of manifest corrections must be agreed upon by all impacted parties. In the future this transaction would be managed more efficiently online in the proposed new digital reporting service. Adjustments can be made directly online, and all parties can login and approve them in a timely manner.

Managing Paper-Based Manifests

Businesses that need to continue using paper manifests will continue to be required to ensure their manifest travels with the waste and applicable filing requirements are met with the ministry.

Managing Electronic Manifests

In the new digital reporting service, manifests completed electronically do not need to be printed and travel with subject waste, however this feature would still be available should it be needed. Businesses will still have to meet other jurisdictional requirements, however, Ontario will continue to work closely with Transport Canada and Environment and Climate Change Canada to ensure the new digital reporting service aligns with initiatives from these federal departments, when the opportunity arises.

Short Term Storage and Onsite Waste Management Activities

Currently short-term storage and onsite waste management activities cannot be reported electronically because this functionality is not available in HWIN (e.g. onsite processing, storage, disposal, etc.). These activities are also under-reported. Moving forward, these reporting activities will be digital and connect with a generator's other reported activities. For example, if a generator moves waste they have been storing and reported on a short-term storage report, they would be given the option to subtract the amount of waste moved from their short-term storage total.

The ministry is exploring ways to improve awareness and compliance with these requirements. For example, many businesses are not aware of their requirement to notify the Director when they are storing subject waste for over 90 days (i.e. can be completed on a Short-term Storage Notification form), or the onsite waste management reporting portion of the Generator Registration Report when they are processing, storing, or disposing their subject waste onsite.

The new digital reporting service will connect all these reports electronically. The tombstone information requested on these forms will only be collected once as a part of registration. This will help make it easier for businesses to track and report on the storage and onsite processing of subject waste.

Mobile Application and Offline Entry Capability

Another helpful feature in the new digital reporting service is the proposal to include a mobile application and offline entry capability. The ministry recognizes that most Ontarians have access to mobile technology and having access to a mobile application would make it easier for businesses to report their subject waste activities as they are happening. Offline capabilities will allow businesses with limited access to internet connections to report on their subject waste activities in a timely and consistent format, with the ability to upload their data when they have access to an internet connection.

Tracking & Reporting - Discussion Questions

In addition to comments or recommendations on the sections outlined above:

1. What is an appropriate amount of time to allow businesses to work offline before being required to sync their data, eliminating gaps in time between shipment and time reported?
2. How long do generators need access to their online registration/reporting data?
    a. When can we archive it from the reporting service?
    b. Will the reporting service suffice as the record or will the generator also need to store this?
    c. How long should we maintain records of active manifests in the reporting service?
3. How would you like to access electronic manifests in the reporting service if there is no longer a paper copy to file?
    a. pdf or excel option?
    b. downloaded as a flat file (i.e. as a datafile that stores data in a plain text format)?
4. How will we handle reporting during emergency situations?
    a. Use offline capability?
    b. Paper availability?
5. How can we improve awareness and compliance with short-term storage and onsite waste management requirements?
6. What is the best way to notify of reporting non-compliance to prevent future non-compliance and ensure timely action is taken?

7. How can we improve reporting of estimates and actual shipped quantities of subject waste?
   a. Should the ministry allow different forms of shipped quantity to be reported? For example, allow reporting of:
      - number of 205L drums?
      - number of Liters extracted by a vacuum truck?
      - number of boxes with dimensions included?
   b. Are there other ways we can improve reporting estimates?
8. What other system features would you like to see in the new reporting service?

Transition Planning

Proposed Transition Timing

The ministry recognizes businesses will need time and supports in place to transition to the new digital reporting service. Business user testing will be an important component of the IT development to ensure the new digital reporting services meets the needs of end users. The ministry is looking to start creating user accounts in summer 2021, so that when RPRA launches the full digital reporting service on January 1, 2022 most users will be trained and familiar with the new reporting service prior to all HWIN generator accounts expiring.

Launch Readiness

The ministry and RPRA will actively engage impacted businesses to ensure they are ready prior to service launch. During the transition period, any remaining paper manifests will be entered directly into the reporting service by the ministry to help ensure continuity of services. HWIN will be updated to re-direct users to the new digital reporting service.

Encouraging Early Adoption of Electronic Reporting

The ministry and RPRA are exploring ways to encourage users to transition to the new digital reporting service (e.g. increasing the cost of processing paper documents, reducing tonnage fees, etc.).

The United States Environmental Protection Agency (US EPA) currently encourages their hazardous waste industry to report using electronic manifests and charges a higher fee for paper submissions. This ensures the true costs of processing paper are recovered. For example, the US EPA fees (for 2020 and 2021 fiscal years) were

in effect by October 2019 and included a range of pricing based on the approach users were taking when submitting manifests (See Table 1).

Table 1: US EPA Manifest User Fees for the 2020 and 2021 Fiscal Years

Manifest Submission Type	Fee per Manifest (US dollars)
Mailed in Paper Manifest	$25.00
Scanned Image Upload	$20.00
Data and Image Upload	$14.00
Electronic Manifest (Fully Electronic & Hybrid)	$8.00

The US EPA has communicated to their regulated community that the best way to reduce user fees is to accelerate the use of fully electronic manifests.

Impacts to Business

The ministry is interested in learning more about the impacts of moving to digital reporting on Ontario businesses. We would be particularly interested in receiving information about current and projected costs associated with: capital and equipment; training and education; labour; record keeping and reporting; as well as other operating and administrative costs.

Transition Planning - Discussion Questions

In addition to comments or recommendations on the sections outlined above:

1. What is a reasonable amount of time to transition to electronic registration/reporting?
2. Are there any transition issues we should be aware of?
3. How much will it cost your business (i.e. labour, capital, IT, etc.) to switch reporting to a digital reporting service?
4. What supports do you need to ensure a seamless transition to a digital reporting service?
5. What best practices do you have in place that you think would benefit other businesses transitioning to digital reporting services?

3. Measuring Our Success

Performance Measures

The services delivered by RPRA and the ministry would be monitored for efficiency and effectiveness on a continual basis. Performance measures and targets would be implemented at the onset of service delivery and a routine program evaluation cycle will be implemented to inform decisions on future program service delivery improvements. Examples of proposed performance measures:

- o Ease of use i.e. average time for users to complete a new online registration or manifest entry
- o Percentage of users reporting system problems
- o Percentage of regulated community reporting satisfaction with system
- o Percentage of manifests submitted electronically
- o Customer service targets (e.g. complaint resolution)
- o Service delivery standards (e.g. customer response time)
- o Reporting service level requirements (e.g. time to address reporting service issues)

The ministry will be developing performance measures to evaluate the success of the digital reporting service implementation (e.g. cost savings, on time delivery, administrative burden reduction, reporting service use).

Performance Measures - Discussion Questions

In addition to comments or recommendations on the sections outlined above:

1. What performance measures should be in place to ensure the digital reporting service is working for you?
2. What performance measures would you like to see the ministry track?

Continuous Improvement

Broader program changes that are not included as a part of this project will be considered in 2022 once the digital reporting service has been implemented.

Currently the goal of the Hazardous Waste program is to ensure the safe management of hazardous waste in Ontario. As a continuous improvement activity, the ministry is exploring ways to connect hazardous waste to the circular economy and look beyond safe management to the reduction of hazardous waste. There is an

opportunity for businesses to find innovative ways to reduce the generation of hazardous waste by improving the design of materials, products and business models. There is also an opportunity to maximize the useful life of materials through resource recovery.

Continuous Improvement - Discussion Questions
1. What continuous improvement initiatives do you think should be considered in the next phase of the project in 2022?
2. In the future, how can we move beyond the safe management of hazardous waste to the reduction of hazardous waste?

4. We want to hear from you

Next Steps

The ministry will consult on the discussion paper for 60 days. All comments received will be considered when developing the regulatory amendments that support hazardous waste digital reporting services. The ministry is proposing to return for consultation on amended and new regulations to support this project in the Fall of 2020.

How to Participate

Let us know what you think! Please let us know if you have any questions about the proposals. We welcome your suggestions and comments on the themes presented throughout the discussion paper. Your ideas will help inform hazardous waste digital reporting modernization in Ontario and the future of the Hazardous Waste program.

As we move forward, there will be additional opportunities for you to participate on new initiatives. We look forward to hearing from you!

General Discussion Questions
1. How will the Hazardous Waste digital reporting service modernization project impact you (or your business)?
2. How would you like to be consulted on the future regulatory changes?
3. What additional steps can we take to improve digital tracking of hazardous waste by generators from the point at which it is generated to the point at which it is disposed/treated?