

## **Global Automakers of Canada's comments on RPRA-MECP Transitional Operating Agreement**

**March 2021**

As Ontario's Ministry of Environment, Conservation and Parks (MECP) Consults on amendments to the Transitional Operating Agreement between the MECP and the Resource Productivity and Recovery Authority (RPRA) our association welcomes the opportunity to provide comment.

We support efforts made by MECP to ensure that the oversight regime for producer responsibility in Ontario is transparent and effective. Previously we have voiced our concern regarding the oversight and accountability framework that governs RPRA's operations and budgeting process. The current effort to improve financial transparency and increase industry input in RPRA's overall operations will have a positive effect for Ontario producers. Addressing administrative inefficiencies for this important oversight body will reduce burden for all regulated parties under the *Waste Free Ontario Act*.

We also want to express our support for the Ministry's proposal to properly define RPRA's functions and clarify its mandate to avoid unnecessary scope creep.

Finally, we would like to highlight and recognize the efforts being made by MECP to ensure data privacy by strengthening language in the operating agreement. RPRA's role as a register of large amounts of producer data requires that measures to protect business confidential information be regularly updated and strengthened.

We appreciate this opportunity for comment and look forward to continuing the dialogue with the Ministry.

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Association Background:

Global Automakers of Canada (GAC) is the national trade association representing the Canadian interests of 15 of the world's most respected automakers. Our members include: BMW Group Canada Inc, Honda Canada Inc., Hyundai Auto Canada Corp., Jaguar Land Rover Canada ULC, Kia Canada Inc., Maserati Canada Inc., Mazda Canada Inc., Mercedes-Benz Canada Inc., Mitsubishi Motor Sales of Canada, Inc., Nissan Canada Inc., Porsche Cars Canada Ltd., Subaru Canada, Inc., Toyota Canada Inc., Volkswagen Group Canada Inc. and Volvo Car Canada Ltd. Together our members represent more than 25 brands in the Canadian automotive market.

The GAC advocates for sound public policy to support a competitive and sustainable automotive market in Canada. Our members are committed to meeting the mobility needs of Canadians by providing greater consumer choice, offering leading edge safety and environmental technologies and eliminating unnecessary regulatory and trade barriers – consistent with the principles outlined in the *Made-in-Ontario Environment Plan*.

In 2020, the member companies of the GAC sold 367 466 vehicles in Ontario representing 58% of the Ontario market. Further our members produced 57% of the vehicles built in Canada at Ontario plants in Alliston, Cambridge and Woodstock, and fully 58% of the vehicles sold by member companies in Canada were built in the NAFTA region, demonstrating a commitment to « building where they sell ». In 2020, Toyota assembled the most vehicles of any manufacturer in Canada and Honda was the third largest producer out of the five Canadian vehicle manufacturers.

Our members have been at the vanguard of the introduction of advanced technology vehicles, whether the technologies be environmental, such as conventional hybrid vehicles, plug-in battery electric vehicles, pure battery electric vehicles or hydrogen fuel cell electric vehicles; or vehicles incorporated the latest Advanced Driver Assistance Systems (ADAS) and increasingly high levels of automation.