

March 9, 2021

BY EMAIL AND UPLOAD

Hon. Jeff Yurek, Minister
Ministry of Environment, Conservation and
Parks
College Park 5th Flr.
777 Bay St.
Toronto, Ontario
M7A 2J3

Dear Minister Yurek,

Re: Amendments to the Transitional Operating Agreement (TOA) between the Minister of the Environment, Conservation and Parks (Minister) and the Resource Productivity and Recovery Authority (RPRA)

ERO number
019-2886

This letter sets out our recommendation as relates to the proposed amendments to the TOA between the Minister and RPRA. **The sole focus of that recommendation is that, at least with respect to the diversion of EEE:**

1. **The proposed industry advisory councils (proposed section 9.8) be compulsory for each designated product stream**
2. **That the industry advisory councils have mandatory composition to include representatives from each of the following service provider groups:**
 - a. **PROs**
 - b. **Processors**
 - c. **Refurbishers**
 - d. **Collection sites, and**
 - e. **Other/small business/charitable enterprises**

While we are not all necessarily specialized in the other product streams that have been designated (eg. batteries, tires, food and organic waste), our general familiarity with diversion programs (including, in particular, e-waste)_informs us that diversion industries built up around other designated product streams have similar service provider groupings, focused on distinctly different products, markets, and processes. As a result, each product stream would be best managed by having its own advisory council, with generally similar composition and representatives who are each specialists and leaders in the service they provide in their respective niches. These groupings of representatives are already familiar

to RPRA as they reflect the groupings of service providers that require registration with RPRA, with some allowance for the representation of smaller/other types of enterprise.

We would like to thank the Minister for giving circular economy minded enterprises the opportunity to provide input on an agreement that governs our regulatory body, and thereby the market in which we operate. To have a stable and recurring forum in which input can be provided would be an important step in ensuring the healthy functioning of this market.

The undersigned were all OES Reuse and Refurbishment Site operators; some were also Collection Site Operators and Processors. Many had been involved in the OES program since its inception and have been actively involved as Registered service providers in the infancy of this new RPRA framework – as PROs, processors, refurbishers, and collection sites. Together, we represent many decades of experience as tech-savvy entrepreneurs, employers large and small, and environmentally minded business leaders. Our participation in the past OES based system, and current participation as operators in the early days of this new framework, affords us a seasoned perspective on the e-waste diversion industry in Ontario. That perspective spans: the impacts of regulation, market dynamics, operations, and how the proposed updates to the TOA can be optimized to see this market function at its best, so that Ontarians receive the greatest economic, environmental and technological benefits. We believe that representatives from our organizations could provide valuable input for the timely and accurate steering of the system towards its goals, and the proposed composition of the industry council would encourage dialogue amongst stakeholder groups and RPRA.

We look forward to hearing back from you and welcome the opportunity to further discuss with you the proposed amendments to the TOA. Should you have any immediate questions, kindly contact Dennis Maslo of Computation Ltd. at 416.801.4358.

Sincerely,

Dennis Maslo
Managing Partner
Computation Ltd.

Shauna McCaffrey
Executive Director
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President
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