



RPRA
Resource Productivity
& Recovery Authority

2025

Business Plan



Corporate Statement

WE ENVISION

a waste-free and prosperous Ontario.

OUR MISSION

is to support waste reduction and resource recovery by enforcing compliance with Ontario’s producer responsibility laws, providing registry services to our regulated community, and reporting publicly on Ontario’s progress towards a circular economy.

Cover photo: A member of the public returning old paints at a depot. All photos in this report were taken on location at community environment days in Toronto, where resources regulated under the Resource Recovery and Circular Economy Act, 2016 are recovered for repurposing or recycling.

All images photographed by **Jason George** | www.jasongearge.com
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01

Glossary

EEE	Electrical and Electronic Equipment	OES	Ontario Electronic Stewardship
EPA	Environmental Protection Act	OTS	Ontario Tire Stewardship
FTE	Full Time Equivalent	PRO	Producer Responsibility Organization
HSP	Hazardous and Special Products	RPRA	Resource Productivity & Recovery Authority
HWP	Hazardous Waste Program	RRCEA	<i>Resource Recovery and Circular Economy Act, 2016</i>
IFO	Industry Funding Organization	SPAC	Service Provider Advisory Council
IAC	Industry Advisory Council	WDTA	<i>Waste Diversion Transition Act, 2016</i>
ITT/AV	Information technology and telecommunications/audio-visual equipment	WEEE	Waste Electrical and Electronic Equipment
MHSW	Municipal Hazardous or Special Waste	WFOA	<i>Waste-Free Ontario Act, 2016</i>

02

Introduction

Enhancing transparency and accountability in Ontario’s waste diversion efforts

Each year, the Resource Productivity and Recovery Authority (RPRA) publishes a three-year business plan setting out the key activities and estimated resources required to deliver its mandate, as described in the goals and objectives set out in RPRA’s strategic plan. This is RPRA’s ninth business plan since it was established on November 30, 2016.

RPRA’s business plan supports its commitment to transparency and accountability to the businesses it regulates, as well as municipalities, First Nations, the public, and the Minister of the Environment, Conservation and Parks, who oversees RPRA’s activities.

The 2025-2027 business plan is based on information available at the time of its development, including ministerial directions received, key assumptions related to operations, and the estimated number of registrants across all RPRA programs.

Mandate overview

RPRA is Ontario’s regulator for waste diversion programs under the *Waste Free Ontario Act, 2016*. We operate at arm’s length from the Ontario government and are accountable to the Ontario Minister of the Environment, Conservation and Parks. RPRA also delivers digital reporting services (registries) on behalf of the Minister under the *Environmental Protection Act*.

RPRA derives its mandate from its governing legislation, regulations under those statutes, and directions received from the Minister.

RPRA’s revenues come from fees charged by RPRA to businesses it regulates; RPRA does not receive any funding from the government.

Producer responsibility programs

Under the *Waste Free Ontario Act, 2016*, RPRA is responsible for implementing Ontario’s producer

responsibility regulatory framework for materials designated by the Ontario government, and for overseeing the wind up of legacy waste diversion programs.

According to the producer responsibility regulatory framework, businesses that supply consumer goods to Ontario are individually responsible for ensuring that the materials generated by these products at end-of-life or from packaging is recovered in accordance with the requirements set out in regulation. RPRA’s role is to enforce the requirements of the producer responsibility regulatory framework and supporting businesses in meeting their responsibilities while minimizing regulatory burden. RPRA also operates a registry that regulated businesses must use to meet their registration and reporting obligations and reports publicly on the outcomes of the producer responsibility regulatory framework.

There are currently six producer responsibility programs, one for each of the following material categories: tires; batteries; information technology, telecommunications, and audio-visual equipment (ITT/AV or “electronics”); lighting; hazardous and special products (HSP); and Blue Box materials.

Hazardous Waste and Excess Soil Registry programs

Under the *Environmental Protection Act* (EPA), RPRA operates two digital reporting services (registries) for excess soil and liquid industrial and hazardous waste that are delivered by the Ministry of the Environment, Conservation and Parks.

Business plan development process

RPRA consults stakeholders throughout the business plan development process by sharing assumptions, the resourcing plan and proposed major activities and performance measures.

RPRA’s role is to enforce the requirements of the producer responsibility regulatory framework and supporting businesses in meeting their responsibilities while minimizing regulatory burden.

Two rounds of meetings are held with its Industry Advisory Council and Service Provider Advisory Council to solicit feedback.

RPRA also consults with the ministry throughout the development of the business plan. However, unlike a government agency, RPRA sets its own budget, which is not subject to approval by the Minister.

RPRA’s advisory councils expressed support for the overall budget and forecasts, as well as the following initiatives:

- Enhancing public reporting on resource recovery and waste information and compliance activities
- Stabilizing the operating reserve level at 38% throughout the business planning period
- Measuring the effectiveness of RPRA’s

- compliance and enforcement activities and assessing the impact of the recent and planned investment to determine value for money
- Reporting on the volume of supplied tonnes reported annually by producers that were not previously registered with RPRA (free riders)

An assessment of RPRA’s achievement and performance for the first fiscal year set out in this three-year plan will be published in RPRA’s 2025 annual report, which will be published on June 1, 2026. The annual report will also include RPRA’s audited financial statements for the 2025 fiscal year. Results and audited financial statements for the 2024 fiscal year will be published in the 2024 annual report on June 1, 2025.



03
2025-27 Strategic Goals

Advancing recycling and resource recovery in Ontario

Since developing its first business plan in 2017, RPRA’s practice has been to define a set of strategic priorities to guide annual activities. The strategic priorities were derived from RPRA’s mandate and a set of operating assumptions that were intended to be relatively stable year-over-year.

Based on a strategic planning exercise carried out in 2023 and 2024 that included input from internal and external advisors and stakeholders, RPRA has defined five overarching strategic goals to guide its work through to 2030. The following five goals replace the four strategic priorities used in last year’s plan.

RPRA’s strategic goals:

- Accessible registry services that provide value to registrants

- Public information about resource recovery, waste and RPRA activities that is useful and trusted
- Effective enforcement that supports waste reduction and a healthy resource recovery sector
- Robust internal systems and processes that remain innovative and adaptable to change
- A connected culture where employees can grow and do meaningful work

Details about RPRA’s process to develop these goals and the connected objectives and strategies can be found in RPRA’s Strategic Plan. RPRA’s major activities and performance measures are laid out according to the elements of the strategic plan in section 8.



04

Overview of Planning Assumptions

A foundation for effective resource management

Each year’s business plan is designed around a set of assumptions relating to RPRA’s operating environment. The assumptions for the 2025-2027 business plan include:

- No change in government direction that would affect RPRA’s operations
 - Although the Minister announced a broad review of producer responsibility regulations in 2023, no decisions have been announced; therefore, RPRA assumes status quo for

2025 for business planning purposes. Future government decisions may require that the plan be revised, and financial contingencies have been added to RPRA’s 2026 and 2027 resource requirement forecasts.

- No new major registry projects
 - No new registry portals will be required during the planning period; the government has not directed RPRA to deliver any new programs, but potential changes to regulations may

04 Overview of Planning Assumptions

- trigger registry modifications with associated costs to RPRA.
- ▼ Registry enhancement investments will continue to maintain and improve registry functioning.
 - Continued oversight of legacy programs
 - RPRA will continue to oversee the wind up of legacy waste diversion programs and the industry funding organizations that operated those programs:
 - ▼ Ontario Tire Stewardship (OTS), assumed to wind up in 2025 following final tax ruling by the Canada Revenue Agency.
 - ▼ Ontario Electronic Stewardship (OES), similarly assumed to wind up in 2025 following final tax ruling by the Canada Revenue Agency.
 - ▼ Stewardship Ontario (SO), assumed to wind up in 2026 following the end of the legacy Blue Box Program on December 31, 2025.
 - Economic assumptions, including interest rates and inflation rates

This plan also assumes that markets and businesses will continue to adapt and change to fulfill relatively new and evolving regulatory requirements and registry procedures.

The plan takes into consideration the government’s proposal to amend regulations following consultation in 2024.

During the 2024-2026 planning period, RPRA assumes it will continue to implement compliance and registry programs for materials obligated by the five regulations issued under the RRCEA: Tires, Batteries, EEE, HSP and Blue Box. RPRA also assumes it will continue to operate the HWP and Excess Soil registries.

This plan also assumes RPRA will continue to engage extensively with producers, municipalities, First Nations, and service providers to continue the transition of the Blue Box Program between 2023 and 2026.

The following table sets out the approximate number of registrants in 2025. The number of registrants, along with data on the number and length of registry support interactions and compliance issues, underpin RPRA’s human resources plan and financial budget and forecasts.

> ESTIMATED NUMBER OF REGISTRANTS IN 2025	
Program	Registrants
Tires	493
Batteries	207
ITT/AV	304
Lighting	83
HSP	386
Blue Box	2,200
HWP	18,000
Excess Soil	500
Total	22,173

The total numbers of registrants per program are expected to stay the same in 2025 and 2026, except for minor variances due to businesses entering and exiting the market, and free riders being brought into compliance. Should any of the key assumptions underlying this plan change, the following priorities, objectives and activities will be adjusted as required.



05

Financial Overview

Maximizing efficiency in our budget and forecasts for 2025-2027

2025 budget and 2026-27 forecasts

This plan sets out a budget for 2025 and forecasts for 2026 and 2027. As detailed in the financial section of this plan, the 2025 budget of \$27.2M represents a 5% increase over the 2024 budget of \$25.2M. The increase is aligned with the 2025 forecast set out in last year's plan and relates primarily to additional strategic investments in staff and technology and registry-related support, including system and business process enhancements, to improve compliance program and service delivery. The 2026 forecast provides for a budget increase of 5% over the 2025 budget, and the 2027 forecast provides for an increase of 5% over the 2026 forecast.

These projected increases are based on economic assumptions (e.g., inflation and interest rates) and

the need for additional investments to ensure RPRA is able to deliver on its strategic priorities and meet the expectations of registrants, the Ontario government, stakeholders, and the public. RPRA continues to build its capabilities to implement increasingly complex and sophisticated compliance and enforcement programs, provide excellent service to registrants, and continuously improve the user experience of our registry portals, and our communications to registrants and all stakeholders.

As an organization delivering public services on behalf of the Ontario government and entirely funded by fees paid by regulated parties, RPRA remains committed to cost-effectively delivering its legislated mandate and helping move Ontario towards a circular economy that reduces waste.

05 Financial Overview

2025 fees

RPRA's annual program fees are finalized after the business plan has been published. Currently, RPRA charges fees to obligated producers under the RRCEA, generators of liquid industrial and hazardous waste required to report via the HWP Registry, and parties required to report via the Excess Soil registry.

RPRA consults on proposed program fees annually through a public consultation process, discussions with our advisory councils, and through direct communications to registrants via emails, the RPRA website and webinars.

Fees are determined based on four inputs:

- The annual budget presented in the business plan
- Program allocations using a cost allocation methodology that assigns direct, indirect and shared costs to each program
- Adjustments to account for program surpluses or deficits from previous years (the result of an over - or under- collection of fees)
- Expected material volumes to be reported during the year to which the fees apply

Each producer's annual fee is based on the tonnage of materials they supply into Ontario, except for tire

producers that pay by the number of tires they supply. Small producers that supply a volume of material that is less than a defined threshold pay a flat fee.

Excess soil and HWP registry users pay fees upon the completion of notices and according to the amount of waste or soil they report.

In past years, annual fees have varied year-over-year, in some cases substantially. Reasons for fee increases above inflation have included uncertainty regarding RPRA's resource needs in the early start-up years as eight new programs with no precedents were established (in 2019, 2020, 2021 and 2023); uncertainty about the volumes of materials that will be reported by producers or generators or designated persons in the coming year; the level of services that newly regulated businesses would need to adapt to the new regulations; and regulatory uncertainty about future government decisions.

RPRA recognizes the importance of predictability for fee paying producers and registrants. As programs mature and volumes of materials become more predictable, we anticipate that year-over-year fee increases will stabilize, and become more predictable. RPRA will explore the option to set fees on a multi-year basis once all program transitions are completed in 2026.





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Overview of Programs

Transitioning Ontario to a producer responsibility framework

Producer responsibility programs under the RRCEA

The *Waste-Free Ontario Act, 2016* is comprised of the *Resource Recovery and Circular Economy Act, 2016* (RRCEA) and the *Waste Diversion Transition Act, 2016* (WDTA). Together, these Acts outline a regulatory framework for transforming recycling in Ontario. Materials managed under three of Ontario’s four legacy waste diversion programs (tires, electronics, and municipal hazardous or special waste (MHSW) have all completed the transition to Ontario’s new producer responsibility regulatory framework for resource recovery. The Blue Box program transition began on July

1, 2023 and will be completed on December 31, 2025.

The producer responsibility regulatory framework under the RRCEA requires producers of designated materials to be financially responsible and accountable for their products and packaging when consumers dispose of them. There are six material groups, each with its own regulation. On the transition dates set out in each regulation, producers of designated materials become obligated to comply on an individual basis with all requirements, including establishing collection networks and meeting mandatory and enforceable management requirements.

06 Overview of Programs

The RRCEA regulations have expanded the list of designated materials compared to the materials managed under the legacy diversion programs: newly included materials are lighting under the Electronics Regulation, rechargeable batteries under the Batteries Regulation, and new categories of hazardous and special products under the Hazardous and Special Products Regulation.

All material groups have transitioned to the new producer responsibility regulatory framework except Blue Box materials (see below for dates). Under the Blue Box regulation, affected municipalities and First Nations transition on three separate transition dates, July 1, 2023, January 1, 2025, and January 1, 2026.

Legacy programs under the WDTA

All material groups except lighting were managed under the WDTA prior to being transitioned to the new producer responsibility regulatory framework. On each transition date, the legacy program terminated and the Industry Funding Organization (IFO) responsible for managing materials began a wind up or liquidation process. RPRA continues to oversee these IFOs until final liquidation. Final liquidation of Ontario Tire Stewardship (OTS) and Ontario Electronic Stewardship (OES) are anticipated to occur sometime in 2025

following final resolution of outstanding tax matters with the CRA earlier this year. Stewardship Ontario, the IFO responsible for the legacy Blue Box program as well as the transitioned HSP program is anticipated to wind up sometime in 2026 after the transition of the final tranche of communities.

Hazardous Waste and Excess Soil registry programs under the Environmental Protection Act

The Hazardous Waste Program (HWP) Registry and mobile app began operating on November 15, 2022, for registration and for manifesting. Compliance and enforcement functions related to the program remain with the ministry. The registry supports the ministry’s goal of ensuring that liquid industrial and hazardous waste is safely managed, while making it easier for the regulated community to report their waste management activities.

The Excess Soil Registry came online on December 1, 2021. In April 2022, the government postponed the deadline for complying with the Excess Soil Regulation requirements to use the registry until January 1, 2023. At the end of 2022, the government passed amendments to the regulation changing some requirements for certain soil removal project owners.





07

Corporate Overview

Understanding RPRA's mandate and governance

Role and legislated mandate

The Government of Ontario established RPRA on November 30, 2016 with passage of the Waste Free Ontario Act, 2016. The two statutes promulgated by this Act, the RRCEA and the WDTA, outline the legislative framework for RPRA's responsibilities, powers, and duties. The Act provides RPRA's mandate to play a key role in reducing waste and litter through resource recovery by:

1. Performing the duties and exercising the powers given to it under the RRCEA, WDTA or any other act; and
2. Providing information to those involved in resource recovery and waste reduction activities in Ontario and the broader public about RPRA's

work to advance a circular economy and enforce producer responsibility requirements.

In 2019, the RRCEA was amended to expand RPRA's mandate to include providing registry services related to resource recovery and waste beyond producer responsibility, as directed by the Minister.

The WDTA sets out RPRA's oversight responsibility for the operation of the legacy waste diversion programs continued under the Act, and the orderly wind up of those programs and the industry funding organizations (IFOs) responsible for managing them.

The RRCEA sets out two frameworks:

1. A producer responsibility regulatory framework within which RPRA develops and maintains a registry and enforces compliance requirements for

07 Corporate Overview

producers of designated products and packaging that result in waste, and for others involved in waste diversion, including collectors, haulers, processors, and other service providers. Under the RRCEA, producers are held individually responsible and accountable for regulated materials following transition from the WDTA, as well as new materials designated by the Government of Ontario.

2. A digital reporting framework within which RPRA builds and operates registries for the Ontario government, as directed by the Minister.

Under its legislation, RPRA's powers and duties include:

- Overseeing IFOs and Industry Stewardship Organizations and the waste diversion programs they operate under the WDTA, including compliance by the organizations with their approved program plans, and compliance by stewards with the rules for stewards established by the IFOs.
- Approving wind-up plans developed by IFOs as directed by the Minister and overseeing implementation of approved plans.
- Reporting publicly on outcomes relating to waste and resource recovery.
- Developing and maintaining an online registry to receive information reported by parties obligated to register with RPRA under the RRCEA or EPA.
- Ensuring compliance by obligated parties with their responsibilities as set out in regulations under the RRCEA.

Governance structure

RPRA is an administrative authority of the Government of Ontario overseen by the Minister and governed by a skills-based board of directors.

The board is responsible for the overall governance of RPRA's affairs and is accountable for the delivery of its mandated objectives under the Acts and the operating agreement between RPRA and the Minister.

In addition to its governance responsibilities, the board also makes statutory decisions as required under the legislation, and as directed by the Minister. These decisions include:

- Setting the annual Steward Obligation (the amount that producers must reimburse

municipalities for delivery of municipal Blue Box programs) for the legacy Blue Box Program.

- Approving, with or without conditions, wind-up plans submitted by IFOs.
- Setting fees to recover RPRA's costs.

The Minister appoints up to five members to the board of directors and the board elects up to six additional members to form the full 11-member board of directors. The Minister may appoint the chair, and the board elects a vice-chair, secretary and treasurer.

The board appoints a chief executive officer and a registrar and delegates responsibilities to these senior staff to manage RPRA's operations. RPRA, its board members, officers, and employees are not agents of the Crown.

Director remuneration is aligned with per diems set out in Ontario's Public Service Agencies & Appointments Directive, and board expenses are strictly managed.

Additional information about the board of directors, including biographies and committees, is available on [RPRA's website](#).

RPRA is committed to carrying out all of its activities in accordance with its [Values and Code of Conduct](#), which can be found on its website.

Relationship with the Government of Ontario

The Minister is responsible for overseeing RPRA.

Roles and responsibilities of the Minister and RPRA are set out in an [operating agreement](#), which is available on RPRA's website.

The board is accountable to the Minister for RPRA's performance.

French language services

The RRCEA requires RPRA to develop a plan to provide services in French, and the operating agreement requires the business plan to outline how RPRA will provide French language services.

RPRA uses a combination of third-party French translation services and bilingual staff to deliver services in French on request.

RPRA has posted its [French Language Services Plan](#) on its website. The plan is reviewed annually and revised as required.



08

Update on Activities since 2024

Our progress and milestones

The 2024 business plan was published in October 2023. The major assumptions made in that plan held true.

Key activities completed since the publication in October 2023 of the 2024 business plan include:

- Supported the successful transition of the first and second tranche of municipalities to Ontario's new province-wide Blue Box program under the Blue Box Regulation

- Published a review of Ontario's residential waste management trends as reported into the Datacall between 2002 and 2021
- Launched Ontario's first comprehensive "Where to Recycle Map" for consumers
- Enhanced its public reporting on resource recovery in Ontario, and RPRA's compliance activities
- Set 2024 fees for all programs

08 Update on Activities since 2024

- Used communication and enforcement tools to maximize compliance across all programs, including developing guidance materials and providing direct support to registrants, finalizing registry procedures, and issuing compliance orders and administrative penalties
- Engaged with RPRA's two advisory councils to seek input on a range of issues, including the

2024 business plan, program fees and RPRA's Strategic Plan

- Completed a comprehensive national search to recruit a new chief executive officer, and appointed Noah Gitterman CEO
- Published its first strategic plan, setting out long-term goals, objectives and strategies, as well as a revised vision and mission



09

Performance Measures

Tracking and measuring our work

The charts below present RPRA's key new activities for 2025, organized according to our strategic goals and objectives. Key new activities represent new initiatives or projects RPRA plans to launch or complete in 2025, in addition to ongoing operations.

Progress toward achieving our strategic objectives is measured by the metrics and key performance indicators (KPIs) listed, which will be reported in the 2025 annual report.

Goal: Effective enforcement that supports waste reduction and a healthy resource recovery sector			
Objectives	Key New Activities	Performance Measures	
		Metrics	KPIs
Make risk-informed decisions about compliance activities	Complete development and automation of risk-based compliance dashboard and begin to integrate dashboard use into compliance operations Consult stakeholders on risk-based compliance framework		
Minimize burden on the regulated community while achieving compliance outcomes	Establish working groups for collaboration with other Canadian producer responsibility regulators Develop and implement new collection and performance-related system guidelines Develop and implement audit procedures, in consultation with stakeholders		Indicator: Percent of previous year's reported supply tonnage submitted by expected deadlines by registered producers Target: 80%
Build trust with our regulated community	Increase staff knowledge and understanding of regulated business sectors with speakers' series, site visits and other activities. Develop a learning and management program to inform ongoing compliance and registry employee training		Indicator: Registrant perceptions of education and outreach materials Target: Meet or exceed 7/10 via annual survey



> Goal: Accessible registry services that provide value to registrants			
Objectives	Key New Activities	Performance Measures	
		Metrics	KPIs
Provide responsive services that enable registrants to meet their regulatory requirements	Open new Blue Box facilities registry portal Finalize and implement registry service delivery model, including proposed service standards Conduct plain language review of RPRA website, compliance documents and registrant communications materials	Track and report publicly on registry support activities including number of unique interactions Track and report on major incidents Track open rate of RPRA emails to registrants about their reporting requirements	Indicator: Registrant perception of registry services via annual survey Target: Meet or exceed 6.87/10
Cost-effectively maintain and enhance usability, security and reliability of the registry	Mature cyber security policies and practices through advancing cybersecurity roadmap Implement system enhancements to improve the efficiency of RPRA's billing and payment processes Establish and implement a plan to prioritize and develop additional enhancements to meet registrant needs.	Registry availability and stability: track uptime during business hours	Indicator: Response times to service-related inquiries and comments

> Goal: Trusted and useful public information about resource recovery, waste and RPRA activities			
Objectives	Key New Activities	Performance Measures	
		Metrics	KPIs
Make registry information public by default, other than commercially sensitive information	Engage users of <i>RPRA's Where to Recycle</i> web-based collection site map to conduct useability review and identify enhancements Develop and launch new public-facing website about Ontario's circular economy		
Present reliable information to support the needs of registrants, the government, other stakeholders and the public	Expand and enhance public reporting on resource recovery, waste and compliance information to include new information, year-over-year trends and data visualizations Update and develop data governance policies to guide data analysis and use throughout the organization	Track time to report supply and performance data from registrant reporting deadline	Indicator: Perception of RPRA's public reporting via survey Target: Continuous improvement
Transparently communicate our operational decisions and activities	Initiate fee methodology and model review Identify additional compliance activity metrics for publication		Indicator: Participant satisfaction with consultations via surveys Target: Meet or exceed 3.7/5



> Goal: A connected culture where employees can grow and do meaningful work			
Objectives	Key New Activities	Performance Measures	
		Metrics	KPIs
Create a supportive, inclusive and trust-based work environment	Initiate annual DEI survey as part of ongoing implementation of DEI action plan and development of DEI activity metrics Implement information-sharing initiatives including enhancing the employee intranet		Indicator: Employee engagement score via annual employee engagement survey Target: Meet or exceed 80% of responses favourable
Empower RPRA employees to innovate, adapt to change, and perform at the leading edge	Implement data-driven retention and recruitment approaches Redesign performance management and create a business-driven competency framework		

> Goal: Robust internal systems and processes that remain innovative and adaptable to change			
Objectives	Key New Activities	Performance Measures	
		Metrics	KPIs
Embed data-informed decision-making in all operations	Launch new data platform to support delivery of risk dashboard, data analysis, data visualizations and data governance Implement operational model developed through a third-party review of the data analytics function Continue implementation of change-management strategy to educate and normalize use of data analysis in decision-making at all organizational levels		
Continuously improve technology, processes, and systems to drive efficiency and effectiveness	Improve the effectiveness of internal financial controls, financial reporting and risk management Enhance incident management processes for all applications and critical system processes, including establishing service level expectations	Track uptime, releases and enhancements - Target: 99.99% system availability - Target: three Salesforce product releases annually - Target: six releases annually for system enhancements	Indicator: Percent of annual expenses recovered Target: Within 10% of cost recovery target
Refine a planning framework that increases alignment, prevents redundancy and fosters innovation	Implement a framework for assessing technology applications to support the RPRA digital roadmap and technology investment plan Review RPRA's planning governance model Assess RPRA's office needs and develop a workplace strategy to maximize productivity, efficiency, and collaboration		

Overall performance KPI: Participant satisfaction with RPRA's performance via annual survey
Target: Meet or exceed 6.69/10



TABLE 1 – ORGANIZATIONAL KEY PERFORMANCE INDICATORS

Indicator	Target
1. Percent of previous year's reported supply tonnage submitted by expected deadlines by registered producers	80%
2. Registrant perceptions of education and outreach materials	Meet or exceed 7/10 via annual survey
3. Registrant perception of registry services via annual survey	Meet or exceed 6.87/10
4. Response times to service-related inquiries and comments	–
5. Perception of RPRA's public reporting via survey	Continuous improvement
6. Participant satisfaction with consultations via surveys	Meet or exceed 3.7/5
7. Employee engagement score via annual employee engagement survey	Meet or exceed 80% of responses favourable
8. Percent of annual expenses recovered	Within 10% of cost recovery target



10

Financial Plan

Resourcing for mandate delivery

Approach

RPRA's financial planning process is overseen by its board of directors. The financial plan reflects the planning assumptions set out in this document, and RPRA's estimation of the resources needed to fulfill its mandate, as set out in legislation, regulations, and the Minister's directions. In exercising its oversight, RPRA's board helps ensure that RPRA achieves value for money by conducting its operations efficiently and economically to fulfill its mandate. This is achieved in part through strong and transparent procurement procedures; a risk-

based compliance framework that drives efficient allocation of compliance resources; investments to ensure technology is secure, resilient and efficient; a strategic approach to human resources that includes assessing service level needs for registrants and hiring as anticipated needs materialize; regular reviews of policies; and organizational improvements implemented by management.

RPRA will continue to operate under a strong accountability framework that includes:

- robust governance

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- proactive and transparent stakeholder engagement
- transparency and cooperation with the ministry to ensure effective oversight
- public reporting on RPRA performance
- procurement and procedures policies

RPRA has also embedded rigorous cost controls including the requirement for business cases for expenditures, strengthened cost estimations, risk and mitigation analysis, expense variance tracking and reporting, and disciplined portfolio and project management on all registry projects.

Budget overview

2024 is the second full year of delivering RPRA's eight programs: six producer responsibility programs for material categories designated under the RRCEA, plus registry programs for tracking liquid and industrial hazardous waste and excess soil to support the ministry's compliance programs under the *Environmental Protection Act* (EPA).

RPRA's 2025 total revenue requirement of \$27.2 M is consistent with the 2025 forecast published in the 2024 business plan and includes budgeted expenses of \$26.1M and an operating reserve contribution of \$1.1M. The year-over-year planned increase of approximately \$1.4 M (a 5% increase over the 2024 budget) is consistent with the estimate forecasted in the 2024 business plan. The increase in RPRA's revenue requirement will be invested in additional compliance and audit and risk staff to develop and implement complex compliance plans, mainly for Blue Box and producer responsibility programs, and to ensure level playing fields for obligated businesses. The increase also reflects planned investments in technology and registry-related costs to support data analytics needed for public reporting and decision making, to maintain the ease and efficiency of our registration, reporting and payment processes for registrants, and to deliver a new registry service and portal for Blue Box facilities. Delivering effective



compliance and registry support that minimizes burden on registrants is core to achieving resource recovery and environmental protection outcomes.

The regulatory review undertaken by the Ministry in 2024 may have impacts on RPRA and the 2025 to 2027 resource requirements. As the outcome of the review is unknown as of the date of publication of this plan, resourcing includes only modest contingencies to accommodate resource implications to RPRA from potential changes to regulations or government direction.

As outlined in the figure 1 below, RPRA's 2025 budgeted expenses of \$26.1M have increased by 78% since 2022, commensurate with the additional resources and technology investments required by its expanded mandate to deliver the HWP and Excess Soil registries, and implement new and maturing producer responsibility programs. As illustrated in the charts in section 10, during this same period registrant interactions grew by 100% to meet the service level expectations of over 18,000 new registrants and producers.

Figure 1 below shows the breakdown of expenses from 2022 to 2027. 2022, 2023, and 2024 are actual expenses, 2025 is budgeted, and 2026-2027 are forecasts.

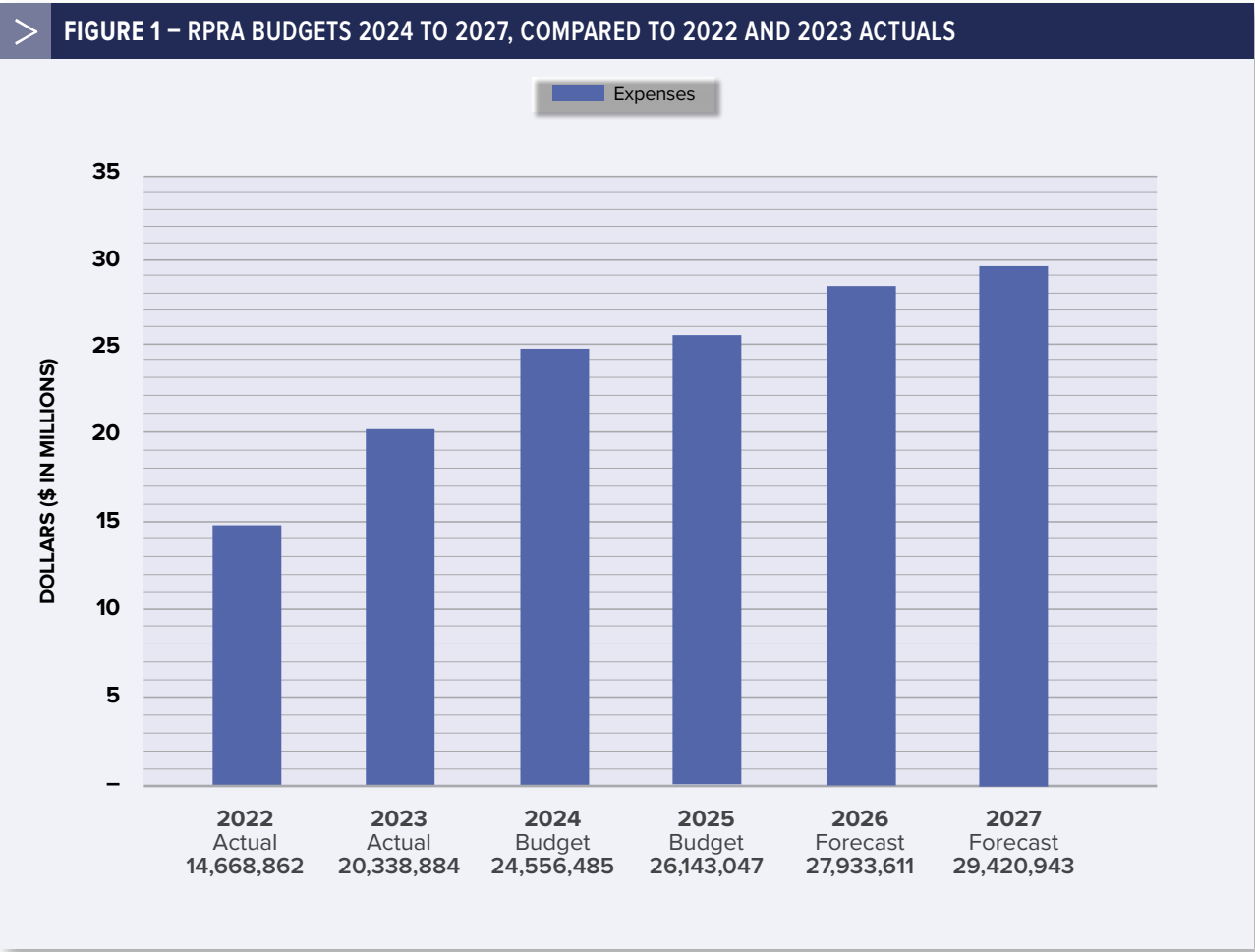
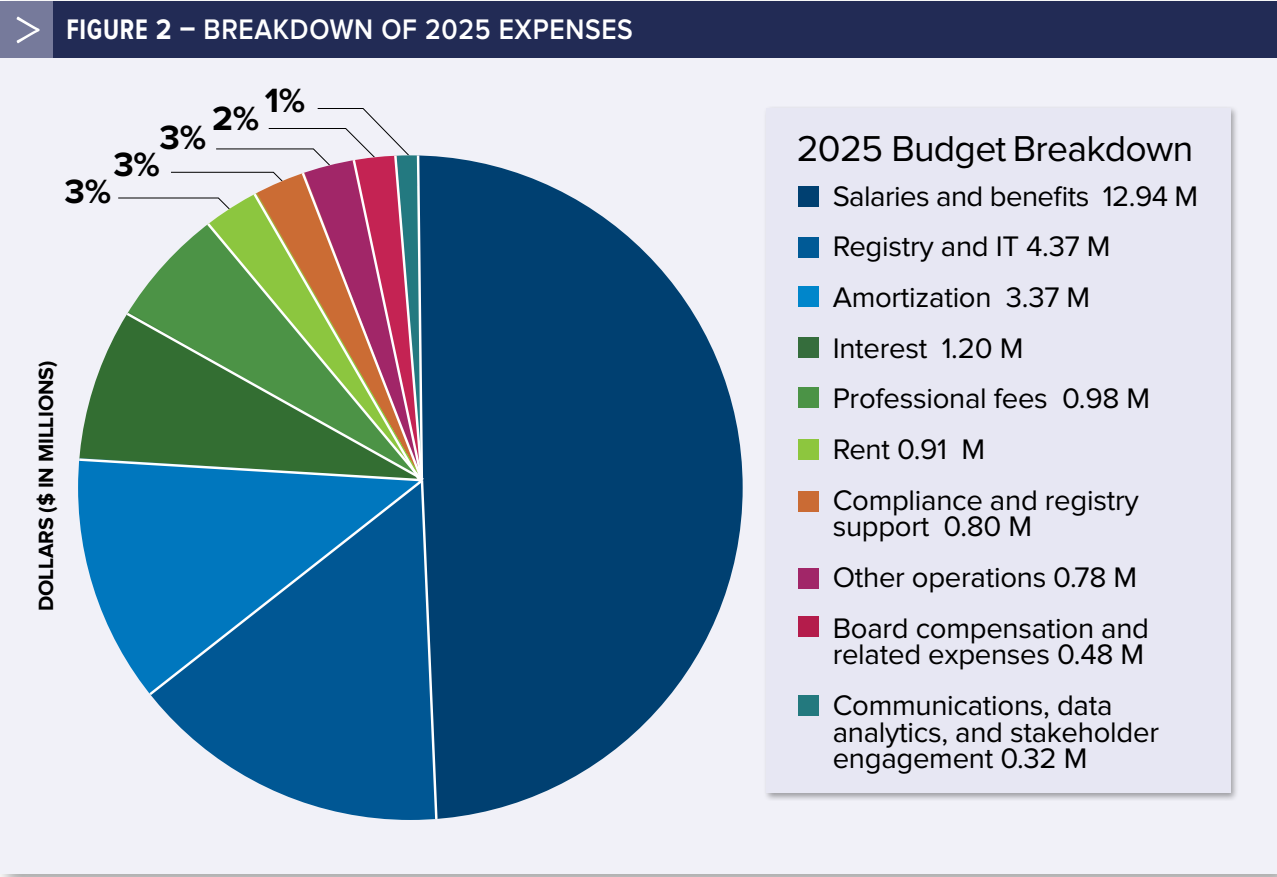


Figure 2 below shows the breakdown of 2025 expenses.



The table below show the RPRA Business Plan figures from 2024 to 2025 which includes budgeted and forecasts figures for 2027.

> TABLE 2 – 2024 TO 2027 BUDGETS AND FORECASTS					
In millions	2024 Business Plan	2025 Business Plan			
	2024 Budget	2025 Budget	25B-24B% Change	2026 Forecast	2027 Forecast
Revenue					
Cost recovery	\$ 24.6	\$ 26.1	6 %	\$ 27.9	\$ 29.4
Recovery of reserve contribution	1.2	1.0	-17	0.6	0.6
Recovery of start-up costs	0.1	0.1	0	0.1	0.1
Interest income	–	0.2	0	0.2	0.2
Recovery of prior year's expenses	0.5	0.3	-39	0.3	–
Total revenues	\$ 26.4	\$ 27.8	5 %	\$ 29.1	\$ 30.3
Total expenses – direct, indirect, and shared					
Salaries and benefits	\$ 11.5	\$ 12.9	12 %	\$ 13.9	\$ 14.7
Communications, data analytics & stakeholder engagement	0.4	0.3	-14	0.4	0.3
Amortization	3.3	3.4	3	3.6	3.9
Board compensation and related expenses	0.5	0.5	-3	0.5	0.5
Rent	0.9	0.9	-2	0.9	0.9
Interest	1.4	1.2	-14	1.2	1.1
Other operating	0.7	0.8	18	0.8	0.8
Professional fees	1.1	1.0	-11	1.2	1.5
Compliance and registry support	0.8	0.8	1	0.9	0.9
Registry and IT	4.0	4.4	9	4.5	4.8
Total expenses	\$ 24.6	26.1	6 %	\$ 27.9	\$ 29.4
Excess of revenues over expenses	1.8	1.6	(0)	1.2	0.9
Total expenses	24.6	\$ 26.1	6 %	\$ 27.9	\$ 29.4
Add: Reserve recovery and RRCEA start up recovery	1.3	1.1	–16%	0.7	0.7
Total revenue requirement (including contribution to reserve and RRCEA start up deficit)	\$ 25.8	\$ 27.2	5%	\$ 28.6	\$ 30.1

The key drivers of the budget increase from 2024 to 2025 are:

- Seven additional FTEs to support compliance activities (especially Blue Box), better registrant communications, and improved organizational planning
- Additional investment in technology and registry related activities, including system and business process enhancements, aligned to RPRA's strategic priorities

The excess of revenues over expenses is forecasted to decrease from \$1.8M in 2024 to \$1.6M in 2025 due to a reduction in the HWP start up deficit recovery. There is also a decrease forecasted in 2026 and 2027 as the budgeted reserve contributions are forecast to decline and the HWP start up deficit is fully recovered. See table 3 next page:

The table below shows RPRA's excess of revenues over expenses from 2022 through to 2027.

TABLE 3 – EXCESS OF REVENUES OVER EXPENSES						
In millions	2022 Business Plan	2023 Business Plan		2025 Business Plan		
	2022 Actual	2023 Actual		2025 Budget	2026 Forecast	2027 Forecast
Revenue						
Cost recovery	\$ 13.2	\$ 20.3		\$ 26.1	\$ 27.9	\$ 29.4
Recovery of reserve contribution	0.9	1.1		1.0	0.6	0.6
Recovery of start-up costs	0.1	0.1		0.1	0.1	0.1
Interest income	–	0.1		0.2	0.2	0.2
Recovery of prior year's expenses	–	0.9		0.3	0.3	–
Total revenues	\$ 14.2	\$ 22.5		\$ 27.8	\$ 29.1	\$ 30.3
Total expenses	\$ 14.7	\$ 20.3	\$ 24.6			\$ 29.4
Excess of revenues over expenses	\$ (0.4)	\$ 2.2	\$ 1.8	\$ 1.6	\$ 1.2	\$ 0.9

Revenue

As authorized by its legislated mandate, the cost of RPRA's 2025–2027 activities will be supported by revenue derived from annual fees charged to three sources:

- Regulated industry funding organizations under the WDTA
- Regulated producers under the RRCEA
- Registrants under the EPA

Registry capital costs are amortized over 3–10 years and are recovered over the same period. They are recovered through producer and registrant fees only, and are not applied to fees recovered from industry funding organizations under the WDTA.

The estimated revenues from industry funding organizations under the WDTA reflect the key wind-up assumptions included in section 10 and

WDTA-related activities. WDTA costs will continue to be recovered from IFOs until wind up of the associated program and liquidation of the organization is complete.

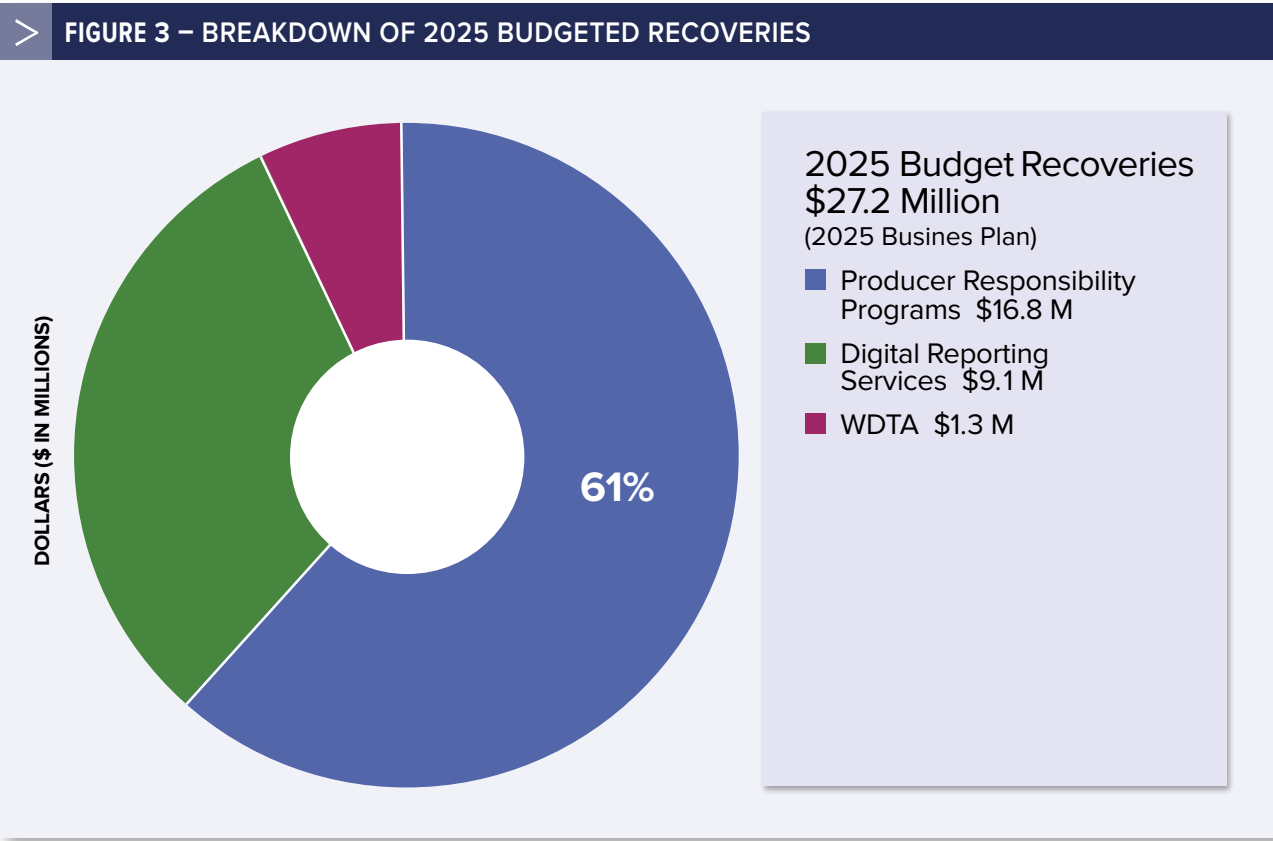
The estimated revenues from regulated parties and registrants under the RRCEA and EPA reflect forecasts of additional registrants as outlined in figure 3. These revenues are derived through program fees.

Additional revenues may be received from administrative penalties. In 2024, RPRA [consulted stakeholders](#) on a policy for the use of funds from administrative penalties.

As illustrated in figure 3, approximately 61% or \$16.8M of RPRA's 2025 budget will be recovered from producer responsibility programs, 34% or \$9M will be recovered from the Excess Soil and HWP programs, and the balance of \$1.3M (5%) will be recovered from WDTA programs.



Figure 3 shows a breakdown of 2025 budgeted recoveries.



As shown in Table 4 below, by 2027, the forecasted portion to be recovered from WDTA fees will decrease to 0%, and the producer responsibility program share of the recoveries will increase to 65%; the balance of 35% is forecasted to be recovered from the Excess Soil and HWP programs. The declining allocation of expenses to programs under the WDTA reflects RPRA's declining activities related to the oversight of legacy waste diversion programs as they cease operating.

The table below outlines the budget requirements for RPRA's programs between 2024 and 2027.

> TABLE 4 – REVENUE REQUIREMENT BY MANDATED SERVICE 2024-2027							
In millions	2025 Business Plan					2027 Forecast	
	2024 Budget	2025 Budget	2025B -2024B \$ Change	% Change	2026 Forecast		
Estimated recovery by mandated services							
Producer Responsibility Programs (Tires, batteries, lighting, ITT/AV, HSP, and BB)	\$15.2	\$16.8	\$1.6	10 %	\$18	\$19.7	
Digital Reporting Services (HWP and ES)	8.9	9.1	0.2	2	9.8	10.4	
WDTA	1.7	1.3	(0.4)	-23	0.8	0.0	-
Total Revenues Requirement (including contribution to reserve, start up deficit)	\$25.8	\$27.2	\$1.4	5%	\$28.6	\$30.1	

Human resources

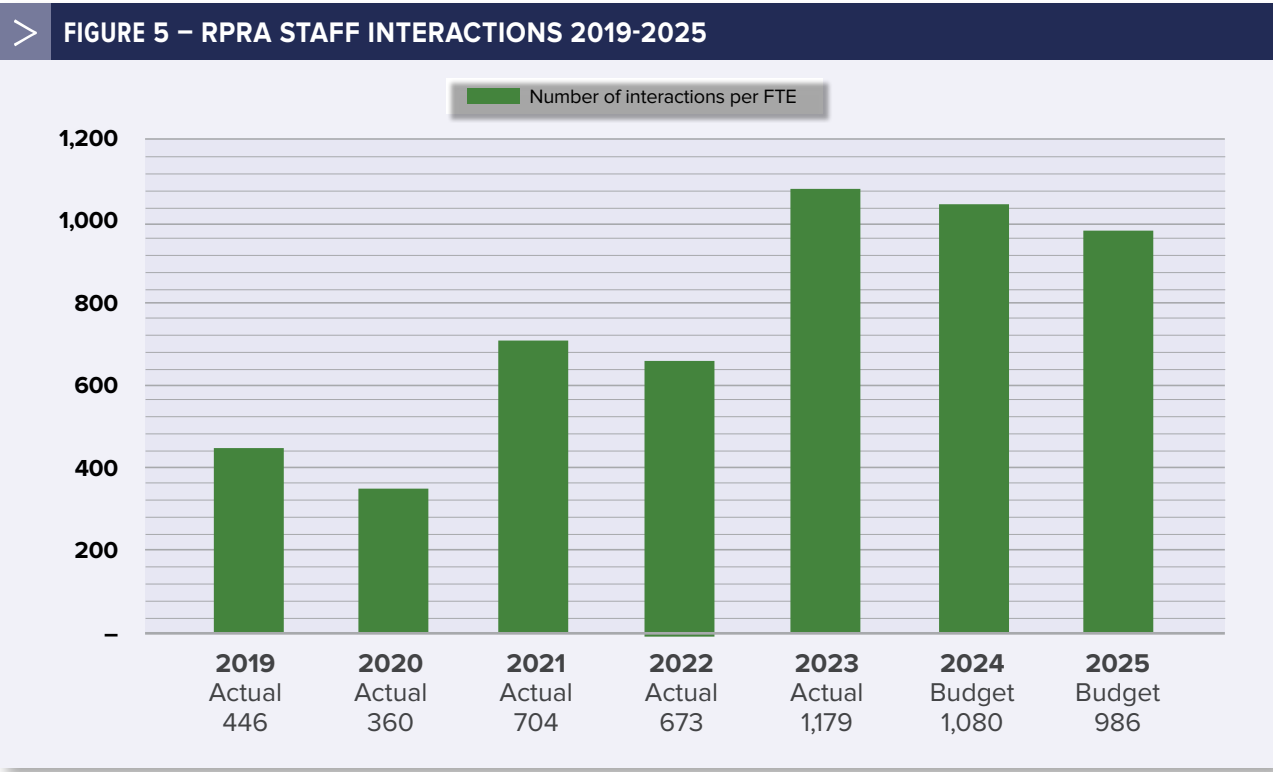
RPRA's staffing plans are based on the level of service required to support all our registrants to fulfill their obligations and achieve compliance, and to conduct analysis, inspection and compliance activities to help ensure a level playing field for obligated businesses. Regulatory requirements for performance and audit continue to come into force as producer responsibility programs mature. Further, as programs transition and continue to mature, the complexity of inspections and compliance activities increases, requiring greater expertise and staff time to execute effectively.

The 2025 budget includes 93 FTEs, seven more than in 2024. The additional FTEs include new positions that will enable improvements to planning capacity and system-wide efficiency initiatives, and provide additional compliance capacity (especially in the Blue Box program)

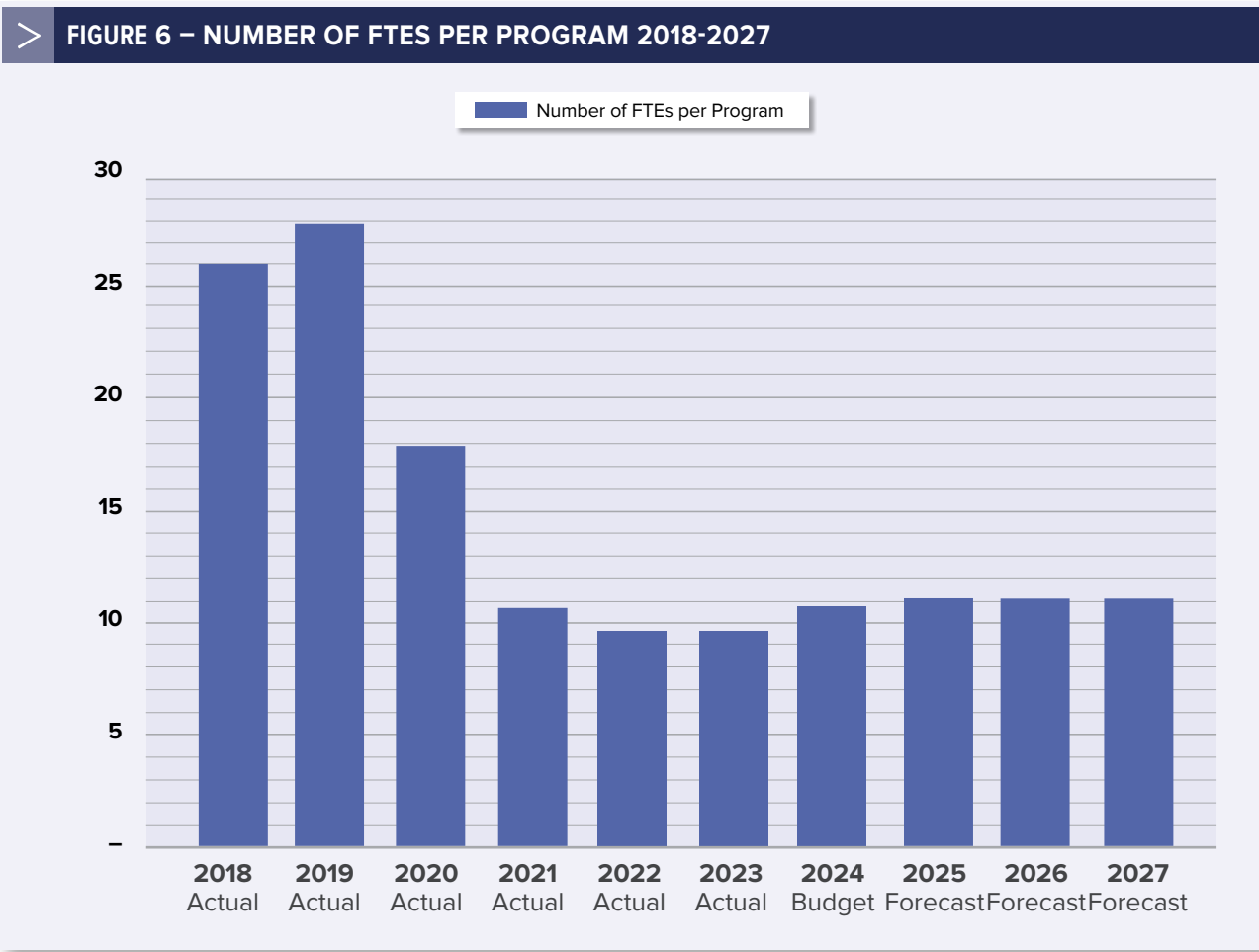
to fulfill audit and verification responsibilities and to improve communications with registrants.

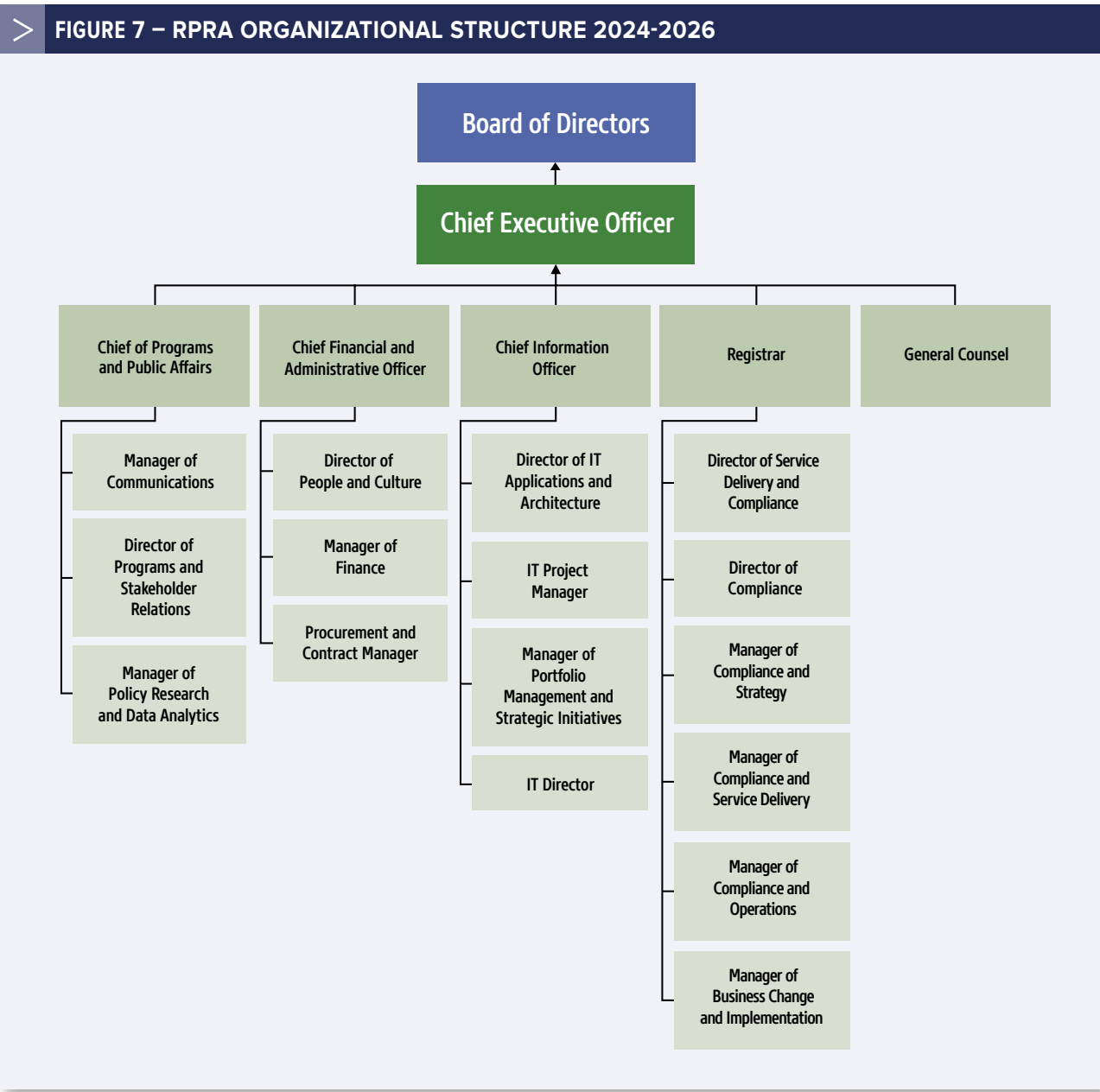
The graphs on the next page show the actual and predicted number of registrants, number of interactions, number of FTEs per program, and number of registrants per FTE from 2018 to 2027. The number of programs, registrants and interactions are forecasted to stabilize after large increases because of new producer responsibility programs coming online between 2019 and 2022, and the implementation of the HWP Registry in 2023. Human resource needs for 2025 and beyond will be driven less by increases in the numbers of registrants and interactions and the need to deliver new programs, and more by service delivery improvements, the transition of the Blue Box program, audit and verification needs, and the complexity of compliance activities.

The figures below show the increase in the number of registrants since 2018 and the number of interactions since 2019.



The following figure show the number of FTEs per program between 2018 and 2027.





Debt financing

RPRA had 8 term loans and credit facilities amounting to \$26.9 M as of December 31, 2023, which were acquired to finance registry development and set-up and operate the Excess Soil and HWP registries.

As of December 31, 2024, the forecasted total amount of debt financing will be approximately \$25 M, which will be repaid with interest over 9 years. The following table shows details of RPRA's debt financing as of December 31, 2023, compared to the forecast for December 31, 2024 and the budget for 2025.

TABLE 5 – DEBT FINANCING 2023 ACTUAL AND 2024 FORECAST COMPARED TO 2025 BUDGET				
Program	(in millions)	Interest rate	Repayment period	2025 Budget
Tires		Term loan; 2.35% fixed until June 2026	2021 to 2031	\$ 1.2
ITT/AV, Batteries and Lighting		Term loan; 2.795% fixed until December 2026	2021 to 2031	0.8
Excess Soil		Term loan; 5.85% fixed until June 2026	2023 to 2033	0.8
HSP		Term loan; 5.85% fixed until June 2026	2023 to 2033	2.3
Blue Box		Term loan; 5.85% fixed until June 2026	2023 to 2033	1.3
Hazardous Waste		Term loan; 5.85% fixed until June 2026	2023 to 2033	7.4
Foundational and Systems		Varies: 2.35%, 2.795% & 5.85% fixed until 2026; prime less 0.75 until 2023	2021 to 2033	4.4
Excess Soil Operating		Prime less 0.75% until June 2025	2023 to 2025	2.5
Hazardous Waste Operating		Prime less 0.75% until June 2025	2023 to 2025	0.6
Total				\$ 21.4



Net assets and operating reserve

RPRA maintains an operating reserve to provide an internal source of funds to ensure sufficient cash flow. The reserve ensures sufficient cash is available to manage the uneven reporting and bill payment cycles for producer responsibility programs (payments are made once per year), and unanticipated situations such as a sudden increase in expenses, unbudgeted expenses, an unanticipated loss in funding, or uninsured losses. RPRA's operating agreement with the Minister states that RPRA's reserve may not exceed 50% of the organization's annual operating costs. The board has established an operating reserve fund policy which is consistent with other regulatory authorities and not-for-profit organizations. An adjustment to recover a prior year deficit or refund a prior year surplus is

applied during the annual fee setting process and does not form part of the operating reserve.

The budgeted cost recovery to maintain the operating reserve will decrease from \$1.2M to \$1.0M or 4% of expenses in 2025, because the operating reserve will earn interest income, thereby reducing the budgeted recoveries. The total reserve balance is expected to grow to \$11.5M by the end of 2027 and stabilize at approximately 39% of total expenses, as outlined in Table 6 below.

The contribution to the reserve will be recovered from all program fees. Any interest earned by the operating reserve fund cash balances will be re-deposited into the fund and will count towards the target annual contribution, in accordance with the board-approved policy.

The following table details RPRA's actual and forecasted net assets and operating reserve balances from 2023 to 2027.

TABLE 6 – NET ASSETS 2023–2027					–
Asset (in millions)	2023 Actual	2024 Budget	2025 Budget	2026 Forecast	
Operating reserve	\$ 7.51	\$ 8.71	\$ 9.91	\$ 10.71	
RRCEA start-up deficit (To be recovered in future years)	(0.55)	(0.46)	(0.37)	(0.28)	
HWP start-up deficit (To be recovered over three years)	(1.45)	(0.94)	(0.62)	(0.30)	
Total net assets	\$ 5.51	\$ 7.32	\$ 8.93	\$ 10.14	39%
Net assets, as a percent of expenses	27%	30%	34%	36%	
Reserve, as a percent of expenses	37%	35%	38%	38%	

Risk

In developing this business plan, RPRA has considered the enterprise risks that could impact execution. RPRA has a robust enterprise risk management plan that identifies, assesses, and develops mitigation plans to manage risks, including risks to the organization, delivery of RPRA's mandate, and achievement of the organization's objectives.

The key risks associated with the 2025-2027 business plan include:

- Uncertain assumptions about government decision making, including the possibility that outcomes of the ongoing regulatory review of producer responsibility regulations will affect RPRA's forecasted expenses during the planning period, the potential for new materials to be designated under the RRCEA, and the potential for new directions to build and operate additional digital registries.
- Uncertain assumptions about the trajectory of inflation and interest rates.
- Uncertain assumptions about the number of registrants and the volume of interactions with compliance and registry officers.
- Uncertainties inherent in the implementation of new and unique regulatory programs, including the level of voluntary compliance by obligated parties, the support needs of those parties, and the effectiveness of communication and compliance strategies.
- Uncertainties in the implementation of the Excess Soil Registry program, including the number of notices filed and accompanying soil volume reported, which may be affected by ministry compliance activities.
- Technology risks in the development and deployment of registry enhancements.

- Uncertainties about availability, recruitment and retention of skilled, competent human resources.

It is important to note that, although RPRA expects the budget to grow at approximately 5% per year during the planning period, the forecasts for 2026 and 2027 are more uncertain than the 2025 budget. Specific uncertainties include:

- The number of registrants and filings in the Excess Soil Registry.
- The ultimate complexity of and volume of interactions for the Blue Box Program, which differs substantially in scope and structure from the other producer responsibility programs.
- Resource requirements to support complex compliance cases and expanding audit and data verification needs across all producer responsibility programs.
- Resource requirements related to data analysis and management to support growing public reporting, compliance, and finance-related data needs.
- The results of competitive procurements for IT support services and other projects.
- Technology costs to implement new or improved registry functionalities.

Modest financial contingencies have been added to the forecasts for 2026 and 2027 due to the possibility of change in RPRA's operating environment.

RPRA's risk mitigation strategies support organizational resilience to deliver its legislated mandate, fulfill directions from the Minister, and achieve its strategic priorities. RPRA will monitor its risks throughout the planning period and will continually assess its exposure and update its mitigation strategies.



RPRA

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