



RPRA

Resource Productivity
& Recovery Authority



**B U S I N E S S
P L A N
2 0 2 4**

OUR VISION AND MISSION



Blue Box materials are piled by a front-end loader at a material recovery facility.

Vision

A circular economy today
for a waste-free tomorrow.

Mission

Support compliance with individual
producer responsibility through
education and enforcement to
foster Ontario's circular economy,
spur innovation, and protect
the environment.

Cover photo: Paint is sorted into vats by colour at a paint recycling facility. All photos in this report were taken on location at Ontario material processing

facilities where resources regulated under the *Resource Recovery and Circular Economy Act, 2016* are recovered, repurposed or recycled.

All images photographed by **Jason George** | www.jasongeorge.com
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Key Acronyms

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>

A focus on stabilizing delivery

This is RPRA's eighth business plan since it was established on November 30, 2016, with the proclamation of the Waste-Free Ontario Act, 2016 (WFOA). This plan sets out RPRA's strategic priorities, objectives, and performance measures, as well as key activities and the human and financial resources required to deliver RPRA's mandate from 2024 to 2026. The activities described in this plan derive solely from RPRA's statutory mandate and the directions received to date from the Minister of the Environment, Conservation and Parks (the Minister).

RPRA's mandate is twofold:

- As Ontario's circular economy regulator, RPRA implements a producer responsibility regulatory framework for materials designated by the Ontario government. There are currently six programs for the following material categories: tires; batteries; information technology, telecommunications, and audio visual equipment (ITT/AV); lighting; hazardous and special products (HSP); and Blue Box materials.
- RPRA builds and operates digital reporting services (registries) on behalf of the Ontario government. RPRA currently operates two registries for programs delivered by the Ministry of the Environment, Conservation and Parks under the Environmental Protection Act (EPA): excess soil, and liquid industrial and hazardous waste.

RPRA's activities during the 2024 to 2026 planning period will be focused on four strategic priorities:

1. Providing Ontario with reliable and useful resource recovery and waste information

RPRA is mandated to report publicly on outcomes of producer responsibility programs and will continue to expand its public reporting to meet the expectations of government, registrants, and the public. RPRA will publish reliable and useful information about its producer responsibility programs, as well as its compliance and registry support activities. Information about resource recovery in Ontario is crucial to achieving the objectives of the *Resource Recovery and Circular Economy Act (RRCEA)*.

2. Providing registrants with accessible and easy-to-use registry services that meet user needs

Every program RPRA operates relies on an online registry to enable mandatory reporting by registrants. Ensuring smooth interaction with the registry minimizes burden on businesses and contributes to achieving compliance outcomes.

3. Delivering an effective compliance program to help achieve resource recovery and waste reduction outcomes for the province

The waste diversion outcomes required under the producer responsibility framework depend on an effective and efficient compliance program to hold regulated businesses accountable.

4. Building an accountable, transparent, and sustainable organization that achieves value for money

The government and stakeholders expect that RPRA will operate in a transparent and financially responsible manner and continue to invest in organizational improvements to achieve service delivery and regulatory outcomes. RPRA will continue to improve its operations and how it measures and reports on these operations to its stakeholders.

For the first time since it was created in 2016, RPRA assumes no new producer responsibility programs or registries will be developed or implemented at the minister's direction during the planning period. RPRA has experienced rapid growth and change over the past three years with the implementation of six programs. RPRA's focus has been on building these new programs, including the necessary registry systems, and developing the necessary human and operational resources. In the 2024-2026 planning period RPRA expects to focus on stabilizing its operations and refining how it delivers its core mandated activities: compliance programs for producer responsibility, support for all registrants in using the registries, and publishing public reports on resource recovery and compliance information.

Although this plan assumes RPRA will not build new registries or operate new programs during the

RPPRA is handling an increasing quantity of data on resource recovery and waste in Ontario

planning period, all programs, especially the newer ones, are still evolving. Markets and businesses are also still adapting, and RPPRA operations are maturing. For the producer responsibility programs, new requirements will come into place, through both staged requirements under regulations and new registry procedures for management requirements, recycling efficiency, and other producer responsibility obligations.

RPPRA will continue to invest resources to ensure the programs it operates are effectively implemented. RPPRA will continue to enhance the ease and accessibility of reporting through the registries, and will also continue to focus on communications, educational activities, and outreach to help businesses meet their obligations in the midst of substantial change.

RPPRA is handling an increasing quantity of data on resource recovery and waste in Ontario due to the expansion of RPPRA's programs and reporting obligations. The data is valuable to all participants in the programs we administer and support, including the regulated community, municipalities, First Nations, policy makers, and Ontarians. RPPRA is mandated to report publicly on this information and will continue to focus on making it accessible, easy to understand, and useful to all of these audiences.

The budget and forecasts presented in this plan are designed to enable RPPRA to deliver on its strategic priorities and meet the expectations of registrants, the Ontario government, stakeholders, and the public. The priorities and resource requirements have been developed in consultation with RPPRA's advisory councils and the ministry. After two years of budget increases to accommodate substantial growth in the number of programs for which RPPRA is responsible, RPPRA forecasts relatively small budgetary increases for the 2024-2026 period, assuming no new government directions to implement new programs or substantially change existing programs.

As an organization entirely funded by fees paid by regulated parties, RPPRA is committed to cost-effectively

delivering its legislated mandate and helping move Ontario towards a circular economy that reduces waste.

Business plan development process

Before October 3rd of each year, RPPRA is required to submit to the Minister and promptly publish a business plan outlining its strategic priorities, objectives, and planned activities for the next three fiscal years. The business plan also sets out financial and operational plans and the necessary financial and human resources required to achieve RPPRA's objectives.

The 2024-2026 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 of RPPRA's programs.

The activities outlined in this plan flow directly from government decisions, including regulations and Minister's directions. If government policy decisions are announced during the planning period that affect RPPRA's activities, or if new information is made available that leads to changes to key assumptions, resource requirements may be revisited. RPPRA will limit hiring and expenditures to what is required to deliver its mandate throughout the planning period.

RPPRA's annual program fees are finalized after the business plan has been published. RPPRA consults on proposed program fees annually in Q4.

Fees are determined based on four inputs:

- 1** The annual budget contained in the business plan
- 2** Program allocations arrived at through a cost allocation methodology that assigns direct, indirect and shared costs to each of RPPRA's program areas
- 3** An adjustment for any surplus or deficit in a program from previous years (the result of an over- or under-collection of fees)
- 4** Expected material volumes to be reported during the year to which the fees apply

RPPRA's business plan is a key transparency and accountability tool for the Minister, providing a

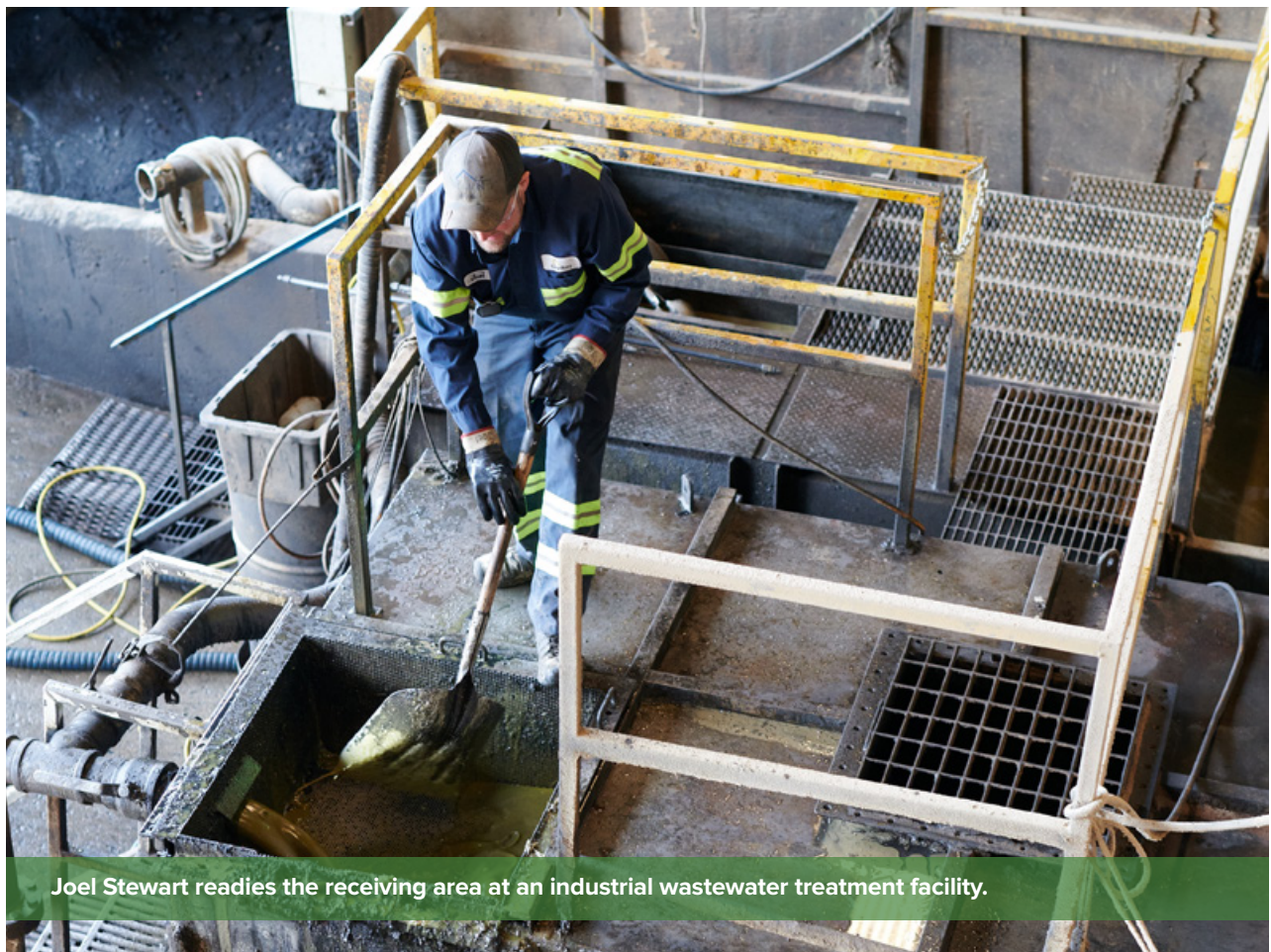
The budget and forecasts in this plan enable RPRRA to deliver on its strategic priorities

multi-year plan to support oversight of RPRRA's activities. It also supports RPRRA's commitment to transparency and accountability to the Ontario government and stakeholders, including its regulated communities, municipalities, First Nations and the public.

RPRRA solicited feedback and provided opportunities for comments and questions about this plan from our Industry Advisory Council and Service Provider Advisory Council. Feedback from these councils included requests for RPRRA to prioritize timely and useful public reporting on progress toward resource recovery outcomes, and on RPRRA's own compliance activities and metrics. Stakeholders also

requested that RPRRA continue to define and track key performance indicators and measures of its objectives. Further information about the advisory councils, including memberships and meeting minutes, is available on [RPRRA's website](#).

An assessment of RPRRA's achievement of the objectives and performance targets for the first fiscal year set out in this three-year plan will be published in RPRRA's 2024 annual report on June 1, 2025. The annual report will also include RPRRA's audited financial statements for the 2024 fiscal year. Results and audited financial statements for the 2023 fiscal year will be published in the 2023 annual report on June 1, 2024.



Joel Stewart readies the receiving area at an industrial wastewater treatment facility.

Compliance and registry support



Crumb rubber created from tires at a tire recycling facility.

Producer responsibility programs under the RRCEA

The Waste-Free Ontario Act, 2016 is comprised of the 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 complete 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 them. On the transition dates set out in a regulation for a material group, producers of designated materials

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become obligated to comply on an individual basis with all requirements, including establishing collection networks and meeting mandatory and enforceable management requirements. The RRCEA regulations have expanded the list of designated materials compared to the materials managed under the legacy diversion programs: it now includes lighting under the Electronics Regulation, rechargeable batteries under the Batteries Regulation, and new categories of hazardous and special products under the regulation of the same name.

The first tranche of communities began transitioning to full producer responsibility for Blue Box materials on July 1, 2023. As additional communities transition out of the legacy program in 2024 and 2025, RPRA will support producers, service providers, and participating municipalities and First Nations communities to successfully transition to the new Blue Box system.

Under the WDTA, RPRA will continue to oversee the liquidation of Ontario Tire Stewardship (OTS) and Ontario Electronic Stewardship (OES), the industry funding organizations that operated the legacy waste diversion

programs for tires and electronics. Stewardship Ontario will wind up sometime in 2026 after the transition of the Blue Box Program to the new regulatory framework is completed on December 31, 2025.

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.

2024 expected program status

Program	Expected status
Tires	Year 6 of fully active producer responsibility program; OTS liquidation
Batteries	Year 4 of fully active producer responsibility program; first year of performance audit reporting
ITT/AV	Year 4 of fully active producer responsibility program; first year of performance audit reporting; OES liquidation
Lighting	Year 2 of fully active producer responsibility program; first year of performance audit reporting
Blue Box	Year 3 of supply reporting; first year of performance reporting; second group of municipalities and First Nations transition to producer responsibility framework; continue WDTA Blue Box program activities and oversight of wind-up
HSP	Year 4 of fully active producer responsibility program; first year of performance audit reporting
HWP	Year 2 of fully operational registry with accompanying mobile app, ministry access portal, and public access to hazardous waste activity reports
Excess Soil	Registry phase 1 fully operational including ministry portal and public access to filings; engaging ministry and stakeholders on scoping phase 2

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Public reports on resource recovery performance and compliance activities

Public reporting on the outcomes of Ontario's producer responsibility programs is a key component of RPRA's mandate. As stakeholders made clear during a 2022 consultation on enhancing RPRA's public reporting activities, it is critical to business success in the growing resource recovery sector. Stakeholders also requested reports on RPRA's compliance activities.

In 2023, RPRA began implementing a public reporting action plan, based on feedback from the 2022 consultation on enhancing public reporting.

A dedicated [public reports section](#) was created on RPRA's website to provide more information about compliance activities, resource recovery performance and registrant surveys, and to disseminate RPRA's annual report and business plans.

In 2024 and throughout the planning period, RPRA will continue to expand on its public reporting of timely and reliable resource recovery information in accessible formats for use by stakeholders, government, and Ontarians, in order to fulfill RPRA's mandate to serve as a key source of information on resource recovery and waste management.



A forklift operator moves a bale of paper at a material recovery facility.

Tracking waste and regulating resource recovery



A bin of component material at an electronics recycling facility.

Role and mandate

The Government of Ontario established RPRA on November 30, 2016, with a mandate to play a key role in reducing waste and litter through resource recovery by:

- Performing the duties and exercising the powers given to it under the RRCEA, WDTA or any other act; and
- 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 RRCEA and the WDTA outline the legislative

framework for RPRA's responsibilities, powers, and duties.

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 producers of 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 implements registries for a wider range of waste and resource recovery and tracking programs, as directed by the Minister.

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.

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.

Governance structure

RPRA is an administrative authority of the Government of Ontario overseen by the Ministry of the Environment, Conservation and Parks 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 of the Environment, Conservation and Parks.

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 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](#).

Relationship with the Government of Ontario

The Minister of the Environment, Conservation and Parks is responsible for overseeing RPRA.

Roles and responsibilities of the Minister and RPRA are set out in the [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 the means by which 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.

Helping registrants navigate change and achieve compliance

The 2023 business plan was published in October 2022. The major assumptions made in that plan held true. However, two government decisions since the plan was published affected operations in 2023 and are reflected in the 2024 plan:

1. Changes to the Excess Soil Regulation approved by the Government of Ontario at the end of 2022 appear to have affected the number of filings and the volumes of excess soil reported. Consequently, RPRA's estimates for the number of required users and filings expected in 2024 have been revised downward.
2. Changes to the Blue Box Regulation made in June 2023 added a new reporting cycle in 2023 and require RPRA to implement new registry procedures – work that will continue into 2024. Regulatory changes to the Tires, EEE, and Batteries regulations in January 2023 also impacted compliance requirements, strategy, and planning.

2023 key activities

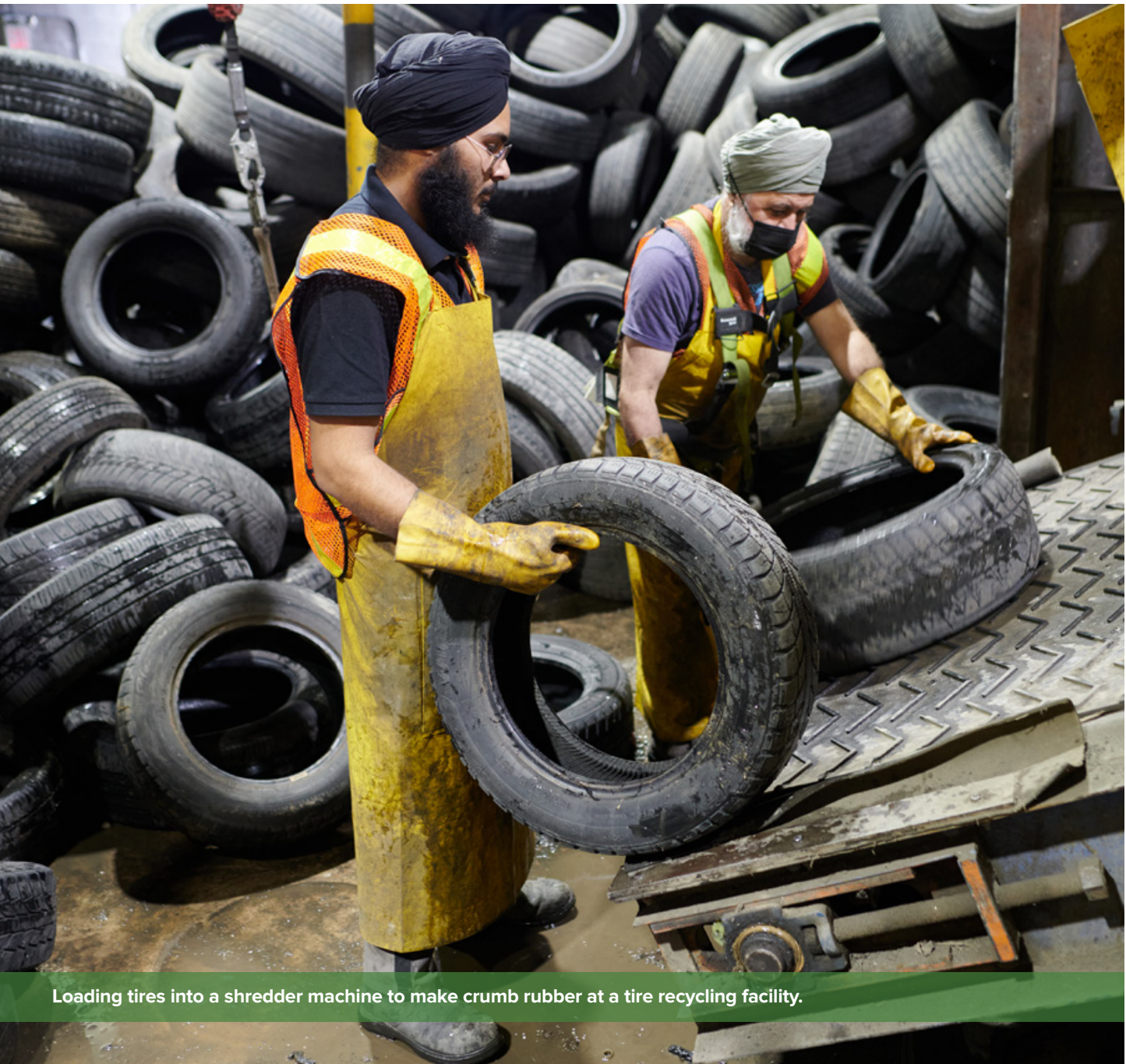
Key activities undertaken since the publication in October 2022 of the 2023 business plan are outlined below.

- The HWP Registry opened on November 15, 2022, to allow users to register and set up their accounts. Electronic manifesting – including the mobile app and third party API – launched on January 1, 2023. The transition went smoothly, and the uptake of the new system is a success for RPRA, the ministry and industry, with more than 14,000 generators logging in since the registry opened and more than 1.5 million tonnes of shipped waste reported through the registry portal, mobile app, or third party API.
- In January 2023, the Ontario government's temporary pause on requirements to report excess soil activity through the Excess Soil Registry ended. RPRA staff have supported over 445 registrants to submit filings to date.
- 2023 RPRA program fees for all programs save HSP were consulted on and published at the end of 2022, marking the first time RPRA has set fees in advance of the calendar year in which they apply. 2023 HSP fees were further consulted on throughout the first half of 2023 and published in July.
- RPRA is implementing a new public reporting action plan to enhance the quantity and format of information RPRA publishes to its website about resource recovery and compliance activities. A [public reports](#) section of RPRA's website was created with new pages for compliance orders and administrative penalties, compliance activities, and program-specific pages reporting on supply of obligated materials and management of those materials year over year.
- A process to develop a five-year strategic plan began in June – research and planning workshops will be ongoing into 2024, with a final plan targeted for completion in spring 2024.
- The first tranche of municipalities that participated in the legacy Blue Box Program transitioned to the new producer responsibility regulatory framework starting on July 1, 2023. RPRA worked closely with producer responsibility organizations (PROs) and other market participants to ensure system readiness for July 1, and to communicate with Blue Box registrants to help them understand their obligations under the new Blue Box Regulation.
- Staff supported producers of tires, batteries, electronics, Blue Box materials and HSP to submit supply and performance reports in the first three quarters of 2023.
- Major projects undertaken in 2023 include the development of registry procedures for all programs except tires, as well as the development of audit and verification plans for applicable programs, and enhancements to the risk-based compliance framework. Compliance staff also developed plans to address instances where producers have yet to participate in the common collection system, in addition to ongoing work to track down free riders.
- RPRA developed and continues to refine an Indigenous Engagement Strategy that serves as a high-level framework to guide meaningful interactions with First Nations communities at

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large, and the development of processes needed for program-specific engagement.

- RPRC conducted ongoing inspections of the battery and tire collection and recovery systems and issued compliance orders to tire PROs that were pending resolution as of September 2023.
- RPRC continued to work with staff at the Continuous Improvement Fund (CIF) to support communities to transition out of the legacy Blue Box program and into the new Blue Box program under the RRCEA. Staff also worked with the CIF to extend the wind-up of the fund by one year to 2024, consistent with the approved wind-up plan.
- Meetings in May and August 2023 of the Industry Advisory and Service Provider Advisory councils provided valuable input into the development of the 2024-2026 strategic priorities, budget, and forecasts in this plan.



Loading tires into a shredder machine to make crumb rubber at a tire recycling facility.

Assumed status of programs and operations

RPRAs 2024-2026 business plan is based on requirements set out in RPRAs legislated mandate, directions received to date from the Minister, and plans announced by the government that affect RPRAs during the planning period.

RPRAs will adjust its activities and review its budget as necessary should any of the assumptions underlying the 2024-2026 business plan change.

Key assumptions related to RPRAs activities in the 2024-2026 planning period include:

- The transition of the legacy Blue Box program to the full producer responsibility regulatory framework is completed on December 31, 2025.
- No new materials are designated under the framework.
- No new directions are received for RPRAs to build and operate registries for waste and resource recovery programs beyond producer responsibility.
- Minimal fluctuations in the number of obligated parties associated with each regulation or registry.

During the 2024-2026 planning period, RPRAs 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. RPRAs also assumes it will continue to operate the HWP and Excess Soil registries.

This plan also assumes RPRAs 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 2025.

The expected status of all programs in 2024 is set out in the chart on page 8.

The following table sets out the approximate number of registrants in 2024. These predictions, along with data on the historic number and length of registry support interactions and compliance issues, underpin RPRAs human resources plan and financial budget and forecasts.

Estimated number of registrants in 2024

Program	Number of registrants
Tires	493
Batteries	207
ITT/AV	304
Lighting	83
HSP	386
HWP	18,000
Excess Soil	500
Blue Box	2,200
Total	22,173

The total numbers of registrants per program are predicted to stay the same in 2025 and 2026, with the exception of minor variances due to businesses entering and exiting the market, confirmation of the reasonably expected number of Excess Soil registrants given the 2022 amendment, 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.

07 STRATEGIC PRIORITIES, OBJECTIVES AND MAJOR ACTIVITIES 2024-2026

Compliance, service delivery and public reporting

RPRAs 2024-2026 strategic priorities reflect RPRAs primary responsibilities and guide RPRAs focus and allocation of resources. They are unchanged from the 2023-2025 business plan.

RPRAs 2024-2026 strategic priorities

Rank	Strategic priorities
1	Providing Ontario with reliable and useful resource recovery and waste information
2	Providing registrants with accessible and easy-to-use registry services that meet user needs
3	Delivering an effective compliance program to help achieve resource recovery and waste reduction outcomes for the province
4	Building an accountable, transparent, and sustainable organization that achieves value for money

Below are the key objectives and major activities planned for 2024 under each strategic priority.

Strategic priority one:

Providing Ontario with reliable and useful resource recovery and waste information

Objective 1

Publishing information submitted to the registry about resource recovery and waste, for use by businesses, the public, and the Ontario government

Major activities

- Expand and enhance public reporting on resource recovery, waste, and compliance information to include new information, year-over-year trends, data visualizations and analysis where necessary

Objective 2

Helping consumers understand resource recovery programs in the province (including where to recycle)

Major activities

- Complete development and implementation of a new web-based collection site map to include information for all programs and expanded functionalities
- Improve website accessibility for the general public by implementing the findings of a user experience review
- Create a dedicated section of the website to provide the general public information about the progress in advancing Ontario's circular economy

07 STRATEGIC PRIORITIES, OBJECTIVES AND MAJOR ACTIVITIES 2024-2026

Strategic priority two:

Providing registrants with accessible and easy-to-use registry services that meet user needs

Objective 1

Developing, maintaining, and enhancing registry portals to meet users' needs and improve RPRAs operations

Major activities

- Manage the data in the registries according to RPRAs Access and Privacy Code, Records Retention Policy and the principles set out in Schedule B (Access and Privacy Principles) of the operating agreement
- Continue to ensure registry stability and availability
- Ensure Salesforce releases and upgrades occur on schedule
- Ensure fixes are prioritized and resolved according to program impact, registrant need, and requirements for stability
- Enhance information security processes and reduce security risks

Objective 2

Minimizing regulatory burden by helping registrants easily accomplish their registration and reporting requirements when using the registry

Major activities

- Implement and refine a service delivery model including an operating model and customer service standards
- Track progress towards proposed customer service standards for email and phone support
- Enhance and standardize ongoing training for the compliance and registry team, in order to improve speed and effectiveness of customer service and compliance activities

Objective 3

Efficiently providing registry support to all registrants across all programs

Major activities

- Develop registry support tools and implement automation where possible to reduce email and phone interactions with front-line registry support staff
- Further develop training, education, and communication material to continue to meet registrant needs

07 STRATEGIC PRIORITIES, OBJECTIVES AND MAJOR ACTIVITIES 2024-2026

Strategic priority three:

Delivering an effective compliance program to help achieve resource recovery and waste reduction outcomes for the province

Objective 1

Supporting our regulated community through education, outreach, and effective and inclusive communications

Major activities

- Continue implementation of strategic communications strategies to educate registrants obligated under RRCEA regulations in order to support compliance; and to support obligated parties in using the registries
- Develop and implement registry procedures to support accurate reporting and performance tracking

Objective 2

Applying risk-based decision making to efficiently allocate compliance and enforcement resources

Major activities

- Continue to develop and implement risk-based compliance plans for all producer responsibility programs (e.g., approaches to free rider cases, verification plans)

Objective 3

Promoting a level playing field for our regulated community and the successful achievement of performance requirements

Major activities

- Oversee implementation of the transition plan for the Blue Box Program
- Oversee the transfer of OES surplus funds to RPRA to reduce RRCEA Program Fees for ITT/AV producers as well as the dissolution of OES as per the WEEE Program Wind-Up Plan
- Oversee disbursement of OTS surplus funds to eligible stewards as well as the dissolution of OTS as per the Used Tires Program Wind-Up Plan
- Ongoing deployment of effective compliance strategies with a focus on communicating for compliance (C4C) to ensure that compliance activities are fair, reasonable, and targeted to achieving key regulatory outcomes
- Carry out risk-based compliance plans

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Strategic priority four:

Building an accountable, transparent, and sustainable organization that achieves value for money

Objective 1

Enhancing RPRAs organizational culture to support a highly engaged workforce and be an employer of choice

Major activities

- Support and enhance RPRAs internal operational culture through ongoing employee engagement, a competitive total rewards framework, talent management, learning and development plans, and succession planning
- Continue to implement a diversity, equity and inclusion action plan

Objective 2

Upholding effective governance to support accountability to the ministry, stakeholders, and Ontarians

Major activities

- Maintain an effective system for responding to public feedback and complaints received by RPRAs related to performing its duties and exercising its legislated powers
- Monitor and maintain sound financial controls, policies, procedures, and regular financial reporting
- Implement financial and administrative tools to improve automation and process improvements
- Continue to provide key communications in French consistent with RPRAs French Language Services Plan
- Set fees consistent with the General Fee- Setting Policy, and enhance transparency of cost allocation and fee-setting decision making
- Monitor, track, and report on enterprise level risks
- Complete five-year strategic plan

Objective 3

Undertaking consultations, stakeholder engagement activities, and annual reporting to ensure accountability and transparency

Major activities

- Submit 2023 Annual Report by June 1, 2024
- Hold Annual Public Meeting in June 2024
- Submit 2025-2027 business plan by October 3, 2024
- Undertake consultation on annual program fees
- Continue to use the Industry Advisory Council and Service Provider Advisory Council as forums to enable open dialogue with stakeholders, information sharing and effective engagement, including in the development of the annual business plan

Objective 4

Using data to enhance programs and decision-making across the organization

Major activities

- Build internal capacity in data governance, management and analysis to support public reporting, compliance decision-making, financial and administrative reporting, and internal policy and program development

Major activities for the rest of the planning period

In addition to the major activities identified above under the four strategic priorities for all programs, major 2025 and 2026 activities will include:

- Phased implementation of the Blue Box producer responsibility program
- Additional public reporting activities to ensure the regulated community and the public have access to the information they need about resource recovery and waste in the province, and RPRAs compliance activities
- Additional registry enhancements and service improvements
- Additional refinement of and reporting on performance measures
- Program fees review after Blue Box transition is complete

Resourcing for mandate delivery

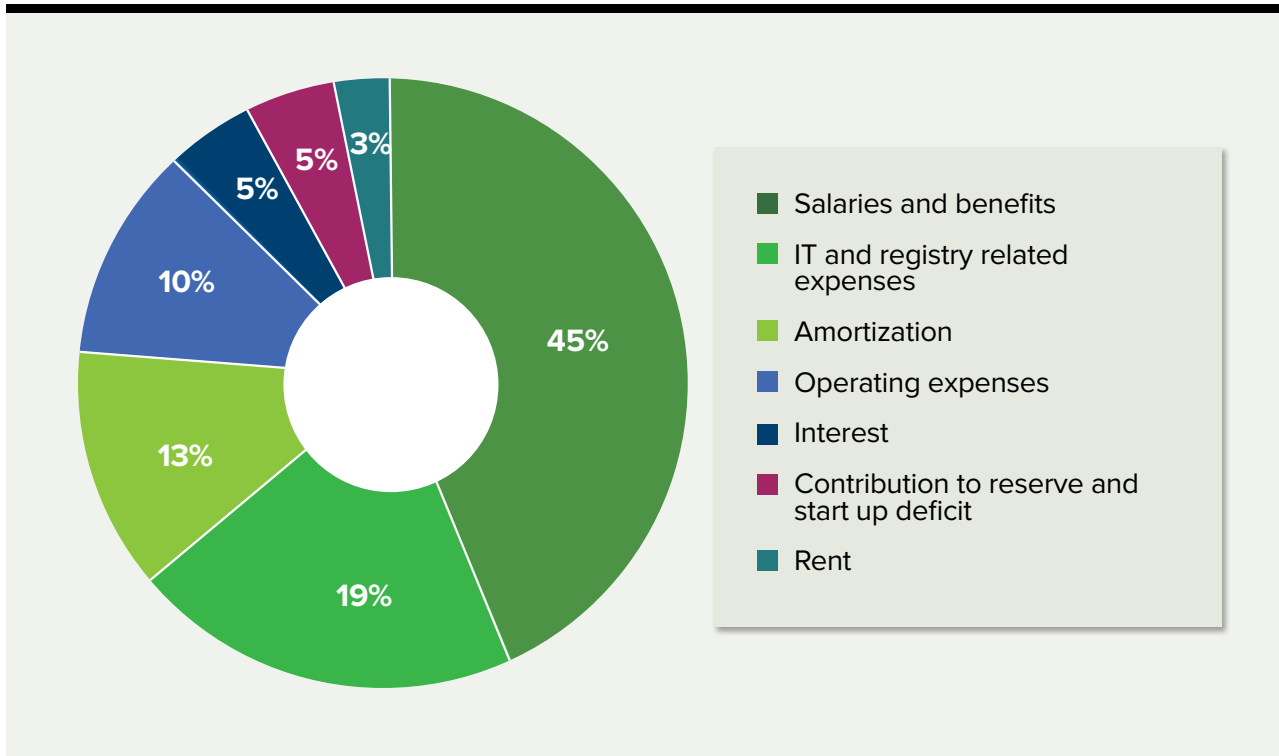
Approach

RPRAs financial planning process is overseen by its board of directors. The financial plan reflects the planning assumptions set out in this document, and RPRAs estimation of the resources needed to fulfill its mandate, as set out in legislation, regulations, and the Minister’s directions. In exercising its oversight, RPRAs board helps ensure that RPRAs conducts 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; 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.

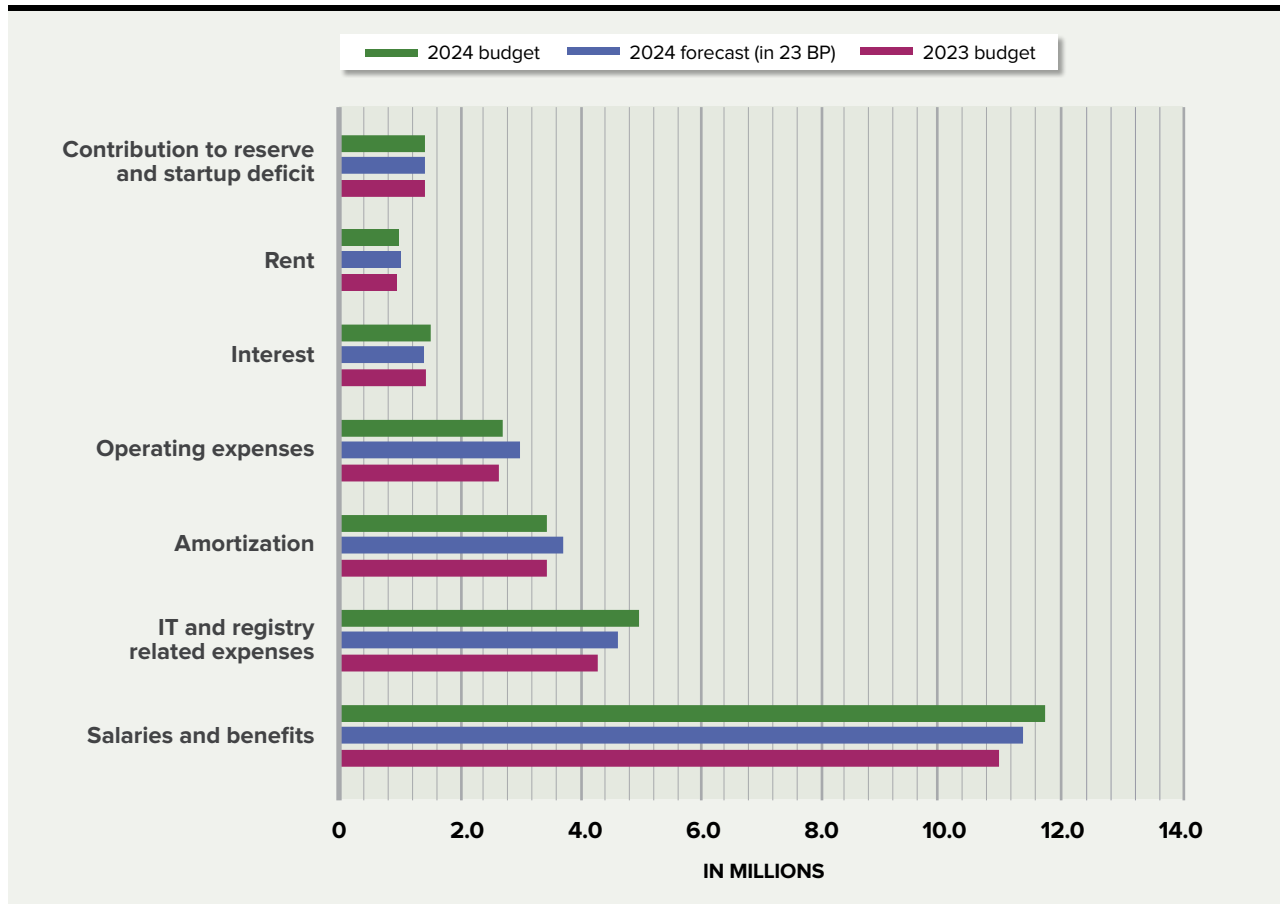
Budget overview

RPRAs 2024 total budget is consistent with the 2024 forecast published in the 2023 business plan. The year-over-year planned increase of approximately \$1 million compared to the 2023 budget reflects additional compliance and registry staff, higher interest expense related to registry projects, and additional IT support and service costs. Salary and benefits are 2% more than were forecasted in last year’s plan to accommodate five additional full-time equivalent staff positions (FTEs) to ensure responsive service to registrants, effective compliance operations, and timely and useful reporting. Delivering effective compliance and registry support that minimizes burden on registrants is core to achieving resource recovery and environmental protection outcomes. The following charts break down the 2024 budgeted expenses and compare them to the 2023 budget and 2024 forecast from the 2023 business plan:

2024 budget



2024 budget compared to 2023 business plan



Components of RPRA’s 2024–2026 financial plan include:

- Human resources
- Revenues and expenses
- Debt financing
- Reserve fund
- Risks

Human resources

In 2023, RPRA operated compliance programs for six material categories designated under the RRCEA, as well as the Excess Soil Registry and the Hazardous Waste Program Registry and mobile app. RPRA’s staffing plans are based on the level of service and support required to help all our registrants fulfill their obligations and achieve compliance.

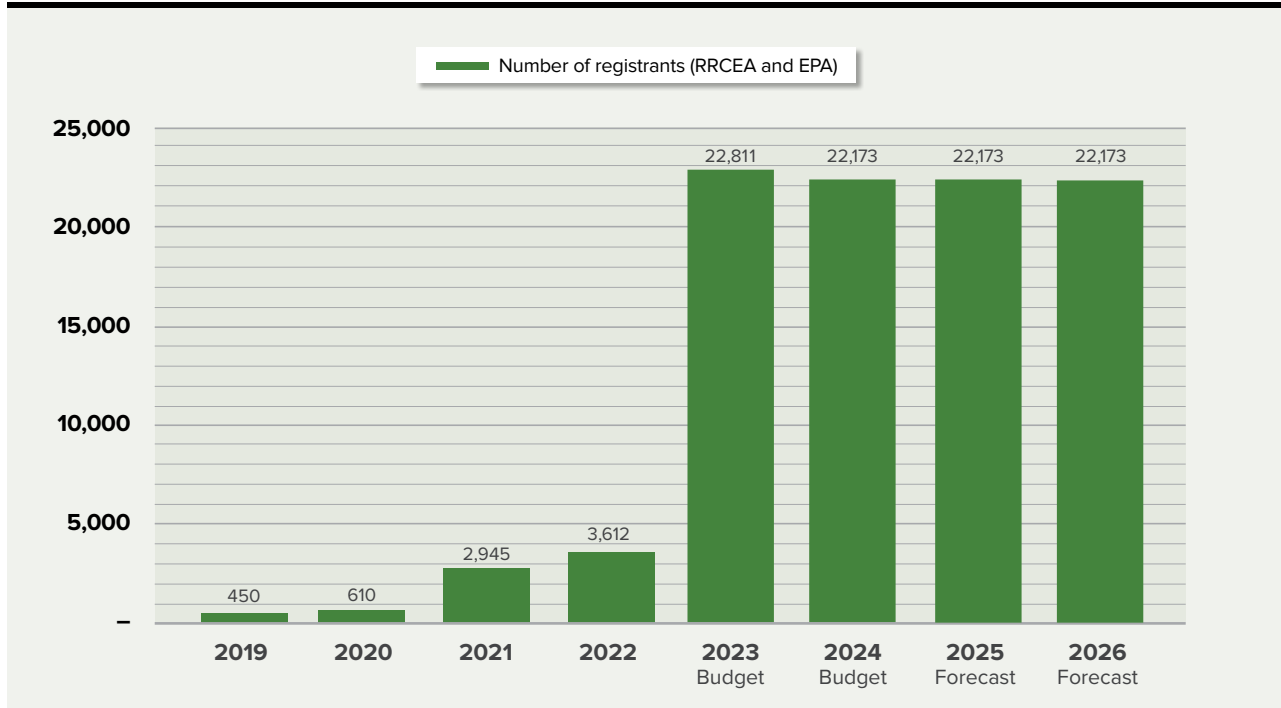
The 2024 budget includes resources for five more FTEs than forecasted last year. The new FTEs, which require a rigorous board approval process, include:

- An administration and finance position to help manage the substantial increase in operational activity related to the volume of registry interactions and fee transactions, especially in the new HWP Registry program since 2022.
- Four new compliance positions to support strategic compliance planning, audit and verification, implementing changes to regulatory requirements, and public reporting on RPRA’s growing store of resource recovery, waste and compliance data.

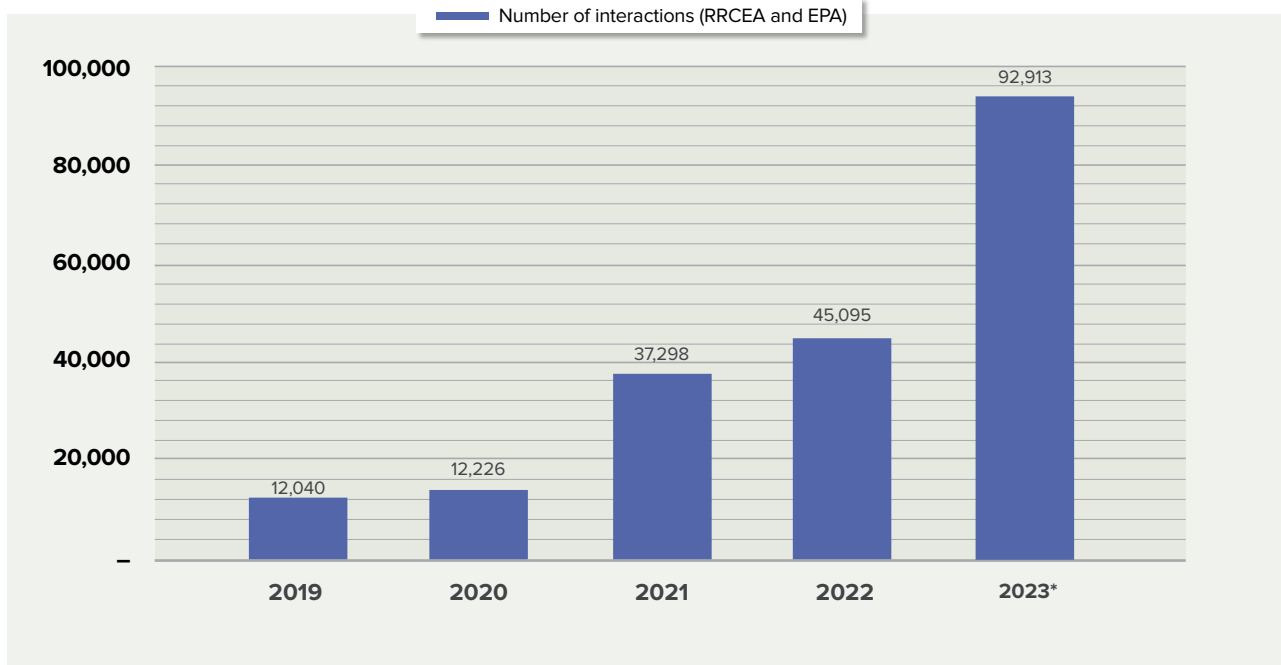
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The graphs below show the increase in the number of registrants and number of interactions since 2019.

Number of registrants 2019-2026



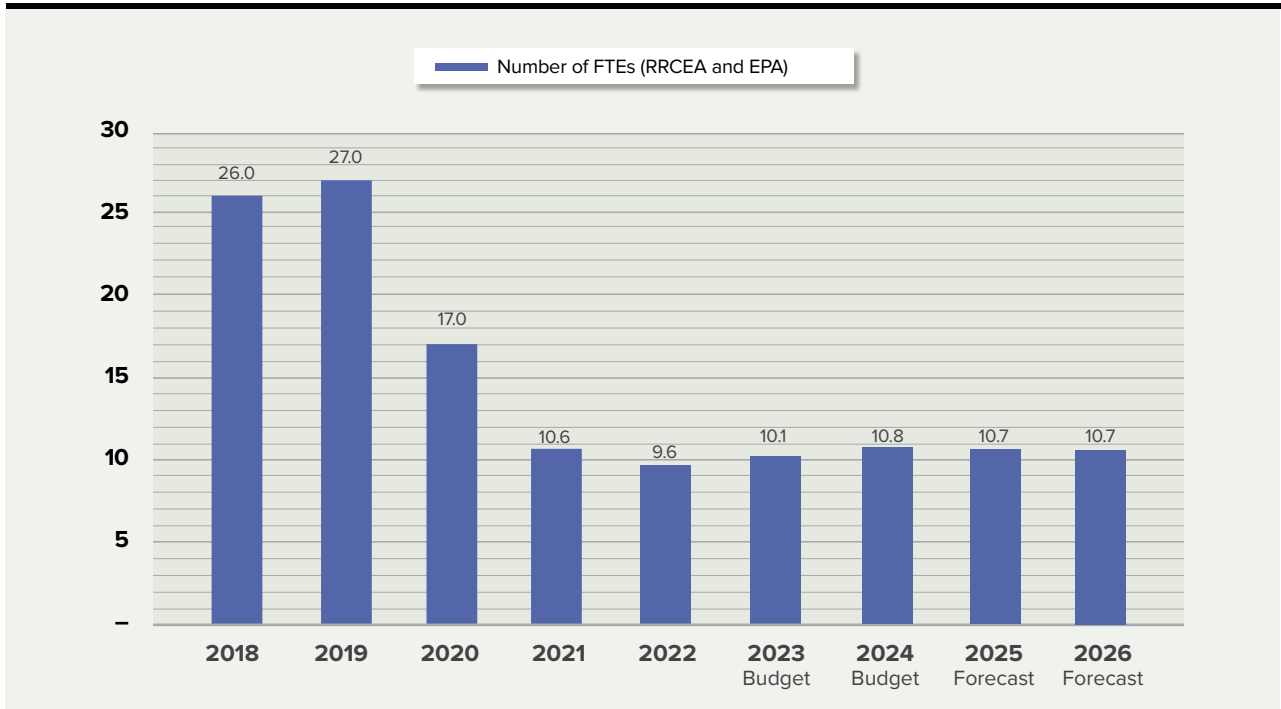
Registrant-RPRA staff interactions 2019-2023



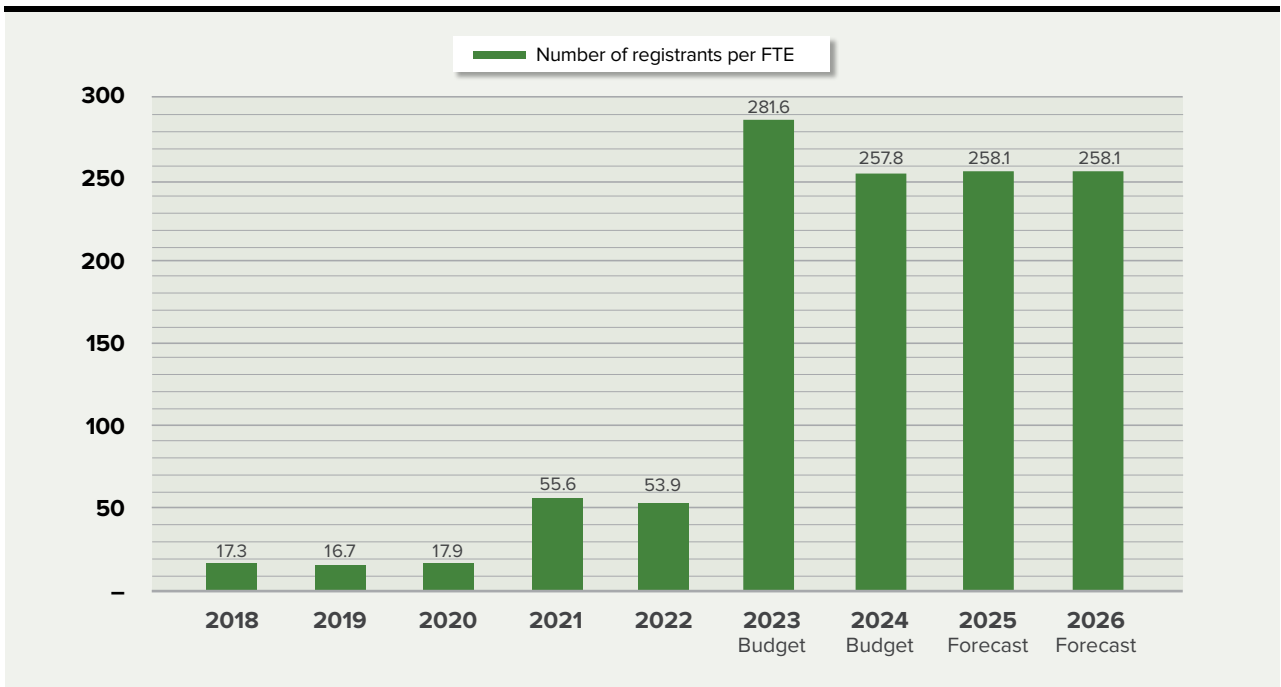
*As of September, 2023.

The following table shows FTEs anticipated to be added in 2024, based on current assumptions, as compared to previous years.

Number of FTEs per program 2018-2026



Number of registrants per FTE 2018-2026



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The following table shows FTEs anticipated to be added in 2024, based on current assumptions, as compared to previous budgets and the 2024 forecast.

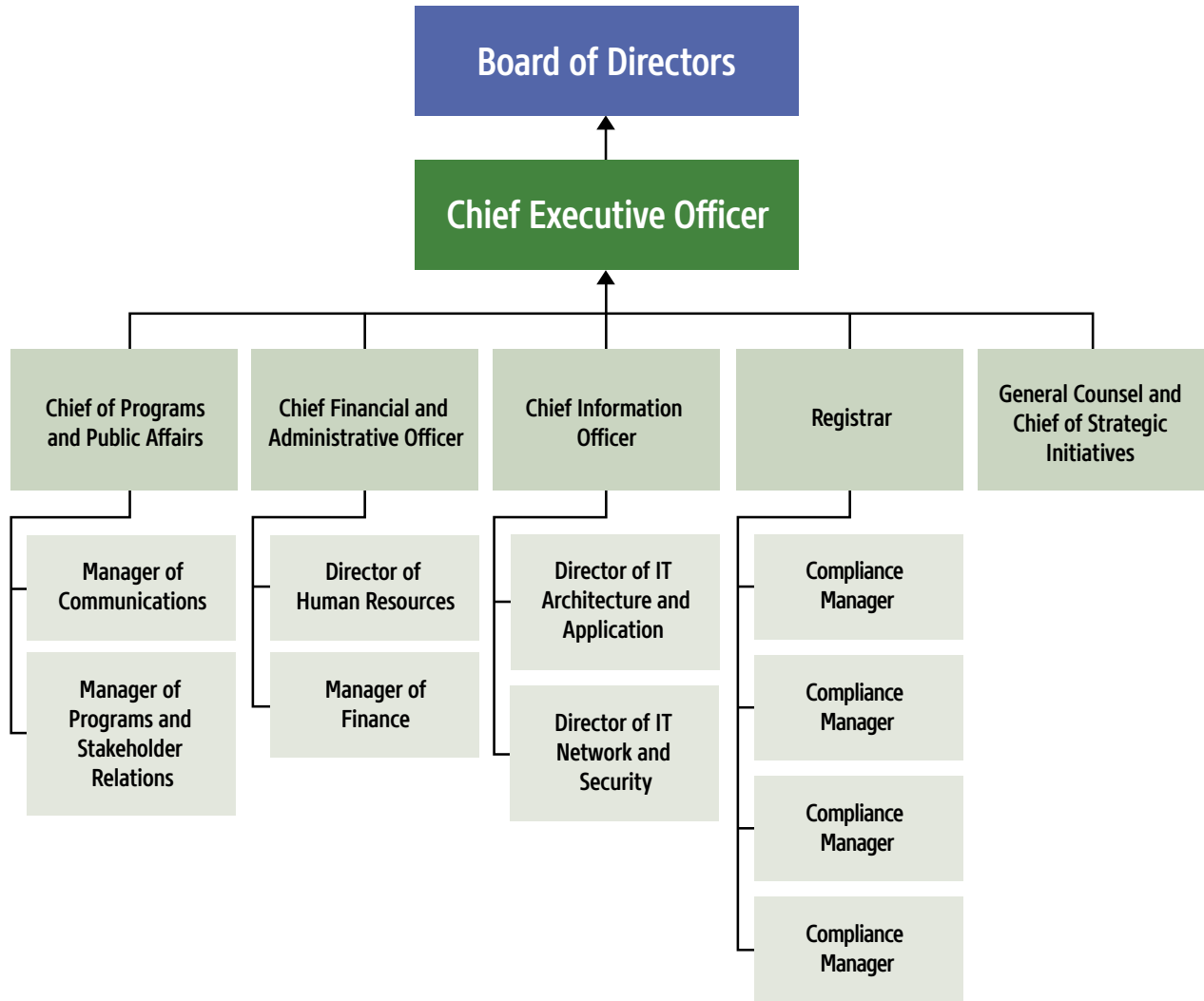
FTEs by team 2021-2024

Team	2021 actual	2022 actual	2023 budget	2024 budget
Finance and Administration	8.5*	11.6	11.6	12.5
CEO Office / Legal / Strategic Initiatives	4	5	5	5.3
Communications, Programs and Public Affairs	13	12.6	14.6	15.6
Information Technology	7	10	14	13
Compliance and Registry	21	28.3	35.6	39.6
Total FTE	53.5	67.5	81	86

*Partial FTEs represent interns and summer students.



RPRA organizational structure 2024-2026



Revenues and expenses

As authorized by its legislated mandate, RPRA's 2024–2026 activities will be supported by revenues from three sources:

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

The estimated revenues from the regulated parties under the WDTA reflect the key wind-up assumptions included in section 6 and are derived through charges to industry funding organizations for WDTA-related expenses. WDTA costs will continue to be recovered from industry funding organizations (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 additional registrants as outlined in the table in section 6 of this business plan and are derived through program fees. RRCEA and EPA costs, including the current year's registry amortization, will be recovered through fees and other charges in each year. Registry capital costs are amortized over 10 years and recovered through annual or transaction-based fees over the ten-year period. All RPRA program fees are currently set annually.

The financial and human resource estimates for 2024 assume RPRA will operate cost-efficiently and effectively to achieve value for money. Any changes to key assumptions outlined in section 6 will be carefully monitored.

RPRA will continue to operate under a strong accountability framework that includes robust governance oversight, stakeholder engagement, ministry oversight, public reporting, procurement policies, and effective cost controls such as business cases for expenditures, strengthening cost estimations, robust risk and mitigation analysis, expense variance tracking and reporting, and disciplined portfolio and project management on all registry projects.

The trend of increasing allocation of expenses to producer responsibility programs under the RRCEA and the HWP and Excess Soil registries under the EPA over the past few years is a result of technology,

RPRA will continue to operate under a strong accountability framework that includes robust governance oversight, stakeholder engagement, ministry oversight, public reporting, procurement policies, and effective cost controls

amortization, and interest-related costs; increasing FTEs for compliance and registry support; and other activities in support of RPRA's mandate.

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. RPRA's costs recovered from IFOs will continue to decline, eventually reaching zero, as remaining IFOs cease operating and are liquidated.

The key drivers of the budget increase from 2023 to 2024 are:

- Inflationary increases in salaries and benefits, and additional FTEs to support operational needs resulting from increasing interactions and transactions with registrants, compliance program needs, and public reporting needs.
- Increase in interest expense due to higher lending rates on debt financing to support the recent registry builds and planned enhancements.
- Registry and IT investments to enhance security and provide effective and efficient service, as well as responsibly manage registry data and report on resource recovery and progress toward achieving outcomes.

2024-2026 business plan

In millions	2023 business plan		2024 business plan		
	2023 budget	2024 forecast	2024 budget	2025 forecast	2026 forecast
Revenue					
Cost recovery	\$ 23.5	\$ 24.5	\$ 24.5	\$ 25.9	\$ 27.0
Reserve contribution recovery	1.2	1.2	1.2	1.2	0.8
Start-up cost recovery	0.1	0.1	0.1	0.1	0.1
Recovery of prior year's expenses	1.1	1.1	0.5	0.5	0.5
Total revenues	25.9	26.9	26.3	27.7	28.4
Total expenses – direct, indirect, and shared					
Salaries and benefits	10.8	11.1	11.4	12.2	12.9
Communications and stakeholder engagement	0.4	0.3	0.4	0.4	0.4
Amortization	3.3	3.5	3.3	3.5	3.7
Board compensation and related expenses	0.5	0.5	0.5	0.5	0.5
Rent	0.9	1.0	0.9	1.0	1.0
Interest	1.3	1.2	1.4	1.2	1.0
Other operating	0.5	0.6	0.7	0.7	0.7
Professional fees	1.3	1.6	1.1	1.3	1.5
Compliance and registry support	0.8	0.8	0.8	0.8	0.8
Registry and IT	3.7	3.9	4.0	4.3	4.4
Total expenses	23.5	24.5	24.5	25.9	27.0
Total expenses	23.5	24.5	24.5	25.9	27.0
Add: Reserve contributions and RRCEA start up recovery	1.3	1.3	1.3	1.3	0.9
Total expenses (includes contribution to reserve and RRCEA start up deficit)	24.8	25.8	25.8	27.2	27.9
Add: Planned recovery of prior year's expenses	1.1	1.1	0.5	0.5	0.5
Total revenue requirements for determination of fees	\$ 25.9	\$ 26.9	\$ 26.3	\$ 27.7	\$ 28.4

The following is a breakdown of the expenses by mandated service (expenses include reserve contribution and RRCEA start-up recoveries).

In Millions	2023 Business Plan		2024 Business Plan		
	2023 Budget	2024 Forecast	2024 Budget	2025 Forecast	2026 Forecast
Estimated recovery by mandated services					
Producer responsibility programs (Tires, Batteries, Lighting, ITT/AV, HSP, and BB)	\$ 14.5	\$ 14.7	\$ 15.2	\$ 16.2	\$ 17.1
Digital reporting services (HWP and Excess Soil)	8.6	9.5	8.9	9.4	9.9
WDTA	1.7	1.6	1.7	1.6	0.9
Total expenses (including contribution to reserve and RRCEA start up deficit)	\$ 24.8	\$ 25.8	\$ 25.8	\$ 27.2	\$ 27.9

Approximately 59% of RPRA's 2024 budget will be recovered from producer responsibility programs, 34% will be recovered from the Excess Soil and HWP programs, and the balance (7%) will be recovered from WDTA programs. By 2026, the forecasted portion to be recovered from WDTA fees will decrease to 3%, and the producer responsibility program share of the recoveries will increase to 61%; the balance of 36% is forecasted to be recovered from the Excess Soil and HWP programs.

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Debt financing

RPRRA had two term loans and credit facilities amounting to \$26.8 million as of December 31, 2022, which were acquired to finance registry development, set-up and operating costs for the Excess Soil and HWP registries.

The builds for the Excess Soil and HWP registries, and the Blue Box and HSP registry portals were financed through credit facilities during development.

In June 2023 these credit facilities were converted to term loans, following the completion of the builds.

As of December 31, 2023, the estimated debt financing will be approximately \$27.7 million, which will be repaid with interest over 10 years, except the operating credit facilities, which will be repaid over three years. The following table shows details of RPRRA's debt financing as of December 31, 2022, compared to the forecast for December 31, 2023.

Debt financing 2022 actual vs 2023 forecast

Program (in millions)	Interest rate	Repayment period	2022 actual	2023 forecast
Tires	Term loan; 2.35% fixed until June 2026	2021 to 2031	\$ 1.9	\$ 1.7
ITT/AV, Batteries and Lighting	Term loan; 2.795% fixed until December 2026	2021 to 2031	1.3	1.2
Excess Soil	Term loan; 5.85% fixed until June 2026	2023 to 2033	1.0	1.0
HSP	Term loan; 5.85% fixed until June 2026	2023 to 2033	2.8	2.9
Blue Box	Term loan; 5.85% fixed until June 2026	2023 to 2033	1.8	1.6
Hazardous Waste	Term loan; 5.85% fixed until June 2026	2023 to 2033	8.5	9.4
Foundational and systems	Varies: 2.35%, 2.795% & 5.85% fixed until 2026	2021 to 2033	6.0	6.4
Excess Soil operating	Prime less 0.75% until June 2025	2023 to 2025	1.8	1.9
Hazardous Waste operating	Prime less 0.75% until June 2025	2023 to 2025	1.8	1.6
Total debt financing			\$ 26.9	\$ 27.7

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Net assets and operating reserve

RPRRA maintains an operating reserve to provide an internal source of funds to ensure sufficient cash flow given the uneven reporting and bill payment cycles for producer responsibility programs (payments are made once per year), as well as for situations such as a sudden increase in expenses, deferred cost recoveries, one-time or unbudgeted expenses, unanticipated loss in funding, or uninsured losses. RPRRA's operating agreement with the Minister states that RPRRA'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 prior year deficits or refund a prior year surplus is applied during

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

The 2024 budget and 2024 forecast maintain the reserve contribution at 5% of expenses. The 2026 forecast includes a decrease in the reserve contribution to 4% of expenses.

The contribution to the reserve will be recovered from all program fees and 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 RPRRA's actual and forecasted net assets and operating reserve balances from 2022 to 2026.

Net assets 2022–2026

Asset (in millions)	Dec 31, 2022	Dec 31, 2023 forecast	Dec 31, 2024 forecast	Dec 31, 2025 forecast	Dec 31, 2026 forecast
RRCEA start-up deficit (to be recovered in future years)	\$ (0.60)	\$ (0.60)	\$ (0.50)	\$ (0.40)	\$ (0.30)
HWP start-up deficit (if costs recovered over three years)	(2.30)	(1.60)	(1.00)	(0.50)	–
Operating reserve	6.30	7.50	8.70	9.90	10.70
Total net assets	\$ 3.34	\$ 5.30	\$ 7.20	\$ 9.00	\$10.40
Net assets , as a percent of expenses	23%	24%	29%	35%	39%
Reserve , as a percent of expenses	43%	34%	35%	38%	40%

Risk

Risk is inherent in any business plan, in particular in a plan that covers three years and is based on uncertain assumptions about the scope of activities required during the planning period.

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 2024-2026 business plan include:

- Uncertain assumptions about government decision making, such as whether new materials will be designated under the RRCEA, or whether changes will be made to regulations that increase RPRA's costs to administer programs.
- 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 new and unique registries for HWP and Excess Soil programs, including the number of transactions and level of support needed for increased transaction volume.
- 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 the forecasts for 2025 and 2026 are more uncertain than the 2024 budget, but RPRA expects relative stability in the growth of the budget during the planning period. However, specific uncertainties remain, including:

- The number of registrants, number of transactions, and volume of contacts for the HWP and Excess Soil registries.

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 volume of contacts for the Blue Box Program, which differs substantially in scope and structure from the other producer responsibility programs.
- The results of competitive procurements for IT support services and other projects.
- Technology costs to service new registry functionalities like the mobile app and API integrations for HWP.

The 2025 and 2026 forecasts assume that the number of FTEs remain stable over the planning period. However, to manage the uncertainties noted above, financial contingencies have been added to the forecasts for those years.

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.

Measuring effectiveness in 2024-2026

RPRRA identifies strategic priorities, objectives, major activities, and key performance indicators and other performance measures in its annual business plan. Completion of major activities (see section 7), key performance indicators and other performance measures will be used to track progress toward RPRRA's objectives in 2024. RPRRA reports on key performance indicators in its annual report, at its annual public meeting, and in the public reports section of RPRRA's website to ensure transparency and accountability to its stakeholders and the public.

RPRRA also reports on resource recovery outcomes for all producer responsibility programs in the public reports section of RPRRA's website, along with

information on compliance activities and metrics, and registrant survey results. All of this publicly available information can be used to assess overall progress by RPRRA, our regulated community and the province towards achieving the goals of the RRCEA.

RPRRA's key performance indicator results for 2023 will be published in its 2023 annual report, which will be posted to RPRRA's website by June 1, 2024. Results for 2024 will be reported in its 2024 annual report, which will be published and posted to RPRRA's website by June 1, 2025.

RPRRA's key performance indicators and other performance measures are organized below according to the strategic priority with which they're associated.

Strategic priority one:

Providing Ontario with reliable and useful resource recovery and waste information

Objectives

1. Publishing information submitted to the registry about resource recovery and waste for use by businesses, the public, and government
2. Helping consumers understand resource recovery programs in the province (including where to recycle)

Key performance indicators

- Perception of RPRRA's public reporting via survey
 - Target to be set after baseline data is collected

Other measures

- Track time to report supply and performance data from registrant reporting deadline
- Completion of expanded collection map
- Completion of dedicated section of RPRRA's website for consumers and the general public



Processing computers into component parts and materials at an electronics recycling facility.

Strategic priority two:

Providing registrants with accessible and easy-to-use registry services that meet user needs

Objectives

1. Developing, maintaining and enhancing registry portals to meet users' needs
2. Minimizing burden by helping registrants easily accomplish their registration and reporting requirements
3. Efficiently providing registry support to all registrants across all programs

Key performance indicators

- Registrant perception of registry services via annual survey
 - Target: Meet or exceed 6.87/10
- Percent of required reports submitted as complete both by registry program, and across programs
 - Target: 100%

- Response times to service-related inquiries and comments
 - Target to be set after baseline data is collected

Other measures

- Track uptime, releases and enhancements
 - Target: 99.99% system availability
 - Target: three Salesforce product releases annually
 - Target: six releases annually for system enhancements
- Track and report on major incidents

Strategic priority three:

Delivering an effective compliance program to help achieve resource recovery and waste reduction outcomes for the province

Objectives

1. Supporting our regulated community through education, outreach, and effective and inclusive communications
2. Applying risk-based compliance frameworks to efficiently allocate compliance and enforcement resources
3. Promoting a level playing field for our regulated community and the successful achievement of performance requirements

Key performance indicators

- Registrant perceptions of education and outreach materials via annual survey
 - Target: Meet or exceed 7/10
- Percent of high priority producer supply and performance reports verified
 - Target: 100% by year-end

Other measures

- Track percent of registrants that receive communications from RPRA regarding their reporting requirements
 - Target: 100%

- Track compliance activity levels and responsiveness, including:
 - Percent of known responsible parties registered
- Response time for complaints
 - Target: within seven days
- Time to close high-priority substantiated free-rider cases
 - Target: within 90 days
- Response time for substantiated non-compliance
 - Target: within 30 days
- Track the number of free riders brought into compliance per year
- Track engagement with high priority registrants prior to reporting deadlines
 - Target: individual engagement for all high priority registrants
- Track number of non-compliance cases opened and resolved within the year (in-year resolution rate)

Strategic priority four:

Building an accountable, transparent and sustainable organization that achieves value for money

Objectives

- Enhancing RPRA's organizational culture to support a highly engaged workforce and be an employer of choice
- Upholding effective governance to support accountability to the ministry, stakeholders, and Ontarians
- Undertaking consultations, stakeholder engagement activities, and annual reporting to ensure accountability and transparency

Key performance indicators

- Participant satisfaction with consultations via surveys
 - Target: Meet or exceed 3.7/5
- Participant satisfaction with RPRA's performance via annual survey
 - Target: Meet or exceed 6.69/10
- Employee engagement score via annual employee engagement survey
 - Target for favourable responses: Meet or exceed 80%
- Percent of annual expenses recovered
 - Target: within 10% of cost recovery target

Other measures

- Track and report publicly on registry support activities including number of unique interactions

Key performance indicators – all strategic priorities

Indicator	Target
1. Perception of RPRA's public reporting via survey	To be set after baseline data is collected
2. Registrant perception of registry services via annual survey	Meet or exceed 6.87/10
3. Percent of required reports submitted as complete and correct, both by registry program, and across programs	100%
4. Response times to service-related inquiries and comments	To be set after baseline data is collected
5. Registrant perceptions of education and outreach materials via annual survey	Meet or exceed 7/10
6. Percent of high priority producer supply and performance reports verified	100%
7. Participant satisfaction with consultations via surveys	Meet or exceed 3.7/5
8. Participant satisfaction with RPRA's performance via annual survey	Meet or exceed 6.69/10
9. Employee engagement score via annual employee engagement survey	Meet or exceed 80% of responses favourable
10. Percent of annual expenses recovered	Within 10% of cost recovery target





RPPRA

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& Recovery Authority

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