

**BUSINESS  
PLAN**

**2026**



## VISION AND MISSION



### Our vision Our mission

A waste-free and prosperous Ontario.

RPRA supports 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.

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.

Thank you Miller Waste Systems - Newmarket Material Recovery Facility, Emterra Tire Recycling and Quantum Lifecycle Partners for the opportunity to capture images of processed bales of aluminum, newspaper, cardboard, plastic bottles, circuit boards and rubber crumb.

All images photographed by **Jason George** | [www.jasongearge.com](http://www.jasongearge.com)  
Art Direction and Design by **deLine & Co.** | [www.delineandco.com](http://www.delineandco.com)

## TABLE OF CONTENTS

<b>01</b>	<b>Glossary</b>	
	Key acronyms.....	3
<b>02</b>	<b>At a glance</b>	
	Smart investments, delivering value.....	4
<b>03</b>	<b>Introduction</b>	
	Accountability, transparency and value-for-money.....	7
	Mandate overview / page 7	
	Business plan development process / page 7	
<b>04</b>	<b>Strategic Framework</b>	
	2026-2028 Strategic Goals.....	10
	Overview of planning assumptions / page 10	
	Estimated number of registrants in 2026 / page 10	
<b>05</b>	<b>Financial overview</b>	
	Up-front investments, downstream cost savings .....	14
	2026 budget and 2027-28 forecasts / page 14	
	2025 fees / page 15	
<b>06</b>	<b>Overview of programs</b>	
	EPR and digital reporting programs .....	16
	Producer responsibility programs under the RRCEA / page 16	
	Legacy programs under the WDTA / page 16	
	Hazardous Waste and Excess Soil registry programs under the Environmental Protection Act / page 16	
<b>07</b>	<b>Corporate overview</b>	
	RPRA's mandate and governance.....	17
	Role and legislated mandate / page 17	
	Governance structure / page 17	
	Relationship with the Government of Ontario / page 18	
	French language services / page 18	
<b>08</b>	<b>2026 Business Plan Activities</b>	
	Strategic investments for smart enforcement .....	21
	Business Planning and 2026 Key Performance Measures / page 21	
<b>09</b>	<b>Financial Plan</b>	
	Resourcing for mandate delivery.....	28
	Approach / page 28	
	Budget overview / page 28	
	Revenue / page 32	
	Human resources / page 34	
	Debt financing / page 40	
	Net assets and operating reserve / page 41	
	Risk / page 41	

## Key acronyms



<b>EEE</b> Electrical and Electronic Equipment	<b>OTS</b> Ontario Tire Stewardship
<b>EPA</b> <i>Environmental Protection Act</i>	<b>PRO</b> Producer Responsibility Organization
<b>HSP</b> Hazardous and Special Products	<b>RPRA</b> Resource Productivity & Recovery Authority
<b>HWP</b> Hazardous Waste Program	<b>RRCEA</b> <i>Resource Recovery and Circular Economy Act, 2016</i>
<b>ITT/AV</b> Information technology, telecommunications, and audio-visual equipment	<b>SO</b> Stewardship Ontario
<b>MECP</b> Ministry of the Environment, Conservation and Parks	<b>UTP</b> Used Tires Program
<b>MHSW</b> Municipal Hazardous or Special Waste Program	<b>WDTA</b> <i>Waste Diversion Transition Act, 2016</i>
<b>OES</b> Ontario Electronic Stewardship	<b>WEEE</b> Waste Electrical and Electronic Equipment Program

## Smart investments, delivering value

The 2026 Business Plan is Resource Productivity & Recovery Authority's (RPRA) 10th plan since it was first established on November 30, 2016. This year's plan continues to make strategic and sustained investments totaling \$29.7M in 2026, an increase of \$2.5M or 9% from 2025, to respond to needs identified by our registrants, ensure effective enforcement of Ontario's producer responsibility laws, and support registrants in complying with their regulatory requirements across both producer responsibility and digital reporting programs.

A central pillar of the 2026 Business Plan is investment in Ontario's Blue Box Program. Of the \$2.5M increase in the 2026 budget compared to 2025, \$2M or 80% of the increase will go directly to supporting the Blue Box Program. These targeted investments will support 10 additional FTEs to build out an audit and verification function that will initially be focused on emerging needs of the Blue Box Program related to the ongoing transition to full producer responsibility, recent regulatory changes, and growing material management costs. Crucially, these investments will support burden reduction for Blue Box producers by identifying free riders; more fairly distributing Blue Box system costs; developing procedures and tools to assist producers in claiming allowable deductions against their recycling targets and increasing the accuracy of supply and performance reporting.

In addition to the strategic investments in the Blue Box Program, the 2026 Business Plan addresses the resources needed to fulfill RPRA's broader three-part mandate to enforce Ontario's producer responsibility regulatory framework for designated materials, deliver excellent digital reporting services for registrants and the Ontario government, and provide accurate and trusted data to registrants and the public. The plan also details RPRA's approach to risk management, human resources, financial

planning, and sets out the key performance metrics and activity indicators that guide RPRA's resourcing, demonstrate its effectiveness, and provide a comprehensive roadmap for the organization's operations.

Through RPRA's strategic investments - particularly in the Blue Box Program - the 2026 Business Plan builds on the strong regulatory foundation RPRA has built over the past decade and enhances its capacity to deliver tangible environmental and economic benefits to Ontario communities and businesses.

Of the 9% year-over-year increase, 6% is a result of new Blue Box Program investments, which respond to new and accelerated needs identified by both RPRA and Blue Box Program participants. Another 0.7% of the increase is a contingency amount to be used, if necessary, to address potential recommendations that result from the Auditor General's performance audit of RPRA, which started earlier this year. Apart from these new unplanned investments, the year-over-year increase is 2.3%, well below what we forecasted for 2026 in the 2025 business plan. This result was achieved through a tight focus during the business planning period on finding savings, plus linking new spending directly to activities that will improve delivery and lower burden for registrants as set out in this business plan. Significant savings are anticipated during the business planning period through a cost containment strategy that includes:

- Savings in rent from 2027 on are expected through a workplace strategy currently being developed ahead of RPRA's current head office lease expiring at the end of 2026
- Identifying savings through automation of invoicing and billing tasks, an AI pilot program, and a workforce review of the external call centre
- Savings in the cost of RPRA's external managed services anticipated through contract

## 02 AT A GLANCE

# These investments will support burden reduction for Blue Box producers by identifying free riders; more fairly distributing system costs; developing procedures to assist producers in claiming allowable deductions and increasing the accuracy of supply and performance reporting.

renegotiations and reassessment of both needs and internal capacity

- Savings in the cost of RPRA's staff benefit program anticipated through a new competitive bidding process

The decision to increase investments in the Blue Box Program was based on extensive engagement with Blue Box Program stakeholders, including RPRA's Industry Advisory Council and Service Provider Advisory Council. Although the advisory councils were not unanimous in their support for the additional investments in the Blue Box Program, members representing more than 80% of the system tonnage and costs agreed with the call for increased investments by RPRA in audit and verification and compliance and enforcement to support burden reduction, identify free riders, and ensure fairer distribution of growing system costs. RPRA is deeply appreciative of the work of the advisory councils and stakeholders in focusing RPRA's strategic planning for 2026.

These investments align with RPRA's commitment to deliver value to the regulated community and will ensure RPRA is able to fulfill its legislated mandate to enforce Ontario's circular economy laws, deliver effective digital reporting services on behalf of the provincial government, protect the environment, and support a competitive and healthy waste management market. These up-front investments are designed to produce downstream cost savings and burden reduction for registrants through reduced costs and effort for registrants undertaking their own audits, identifying and bringing free riders into compliance, and facilitating a fairer distribution

of escalating material management costs.

The investments outlined in this plan also include many initiatives as well as support ongoing activities and processes that will deliver value to registrants, reduce burden on the regulated community, contain costs and facilitate the outcomes of Ontario's circular economy initiative. For example, the Canadian EPR Regulators' Forum, which is identified as a key activity, will be fully operationalized in 2026. One of its primary objectives is identifying harmonization opportunities to reduce burden on businesses working across Canadian jurisdictions. RPRA will also continue to enhance its risk-based compliance framework in 2026, which will ensure limited compliance resources are efficiently deployed to target those registrants and issues that pose the highest risk to the overall resource recovery system. The ongoing development of registry procedures, including conducting a deduction study for the Blue Box Program, will assist registrants with their reporting obligations by providing guidance that will minimize errors and misinterpretations and the need for businesses to procure their own expert advice. RPRA is also anticipating significant savings in rent starting in 2027. A workplace strategy currently underway is exploring options to rationalize its office space to take advantage of the current commercial real estate market. Finally, RPRA's registry enhancements, including the current project to enhance its billing and invoicing system, are focused on improving user experience and reducing burden on registrants.

Since its inception, RPRA has developed a robust set of internal controls and practices to ensure all investments are expended consistently with RPRA's commitment to accountability, cost containment and

## 02 AT A GLANCE

demonstrating value for money, including:

- A robust procurement policy to ensure all its services and products are acquired through competitive processes.
- Benchmarking salaries at the mid-range of the market to control this key organizational cost driver.
- Business case requirements for significant expenditures to ensure key investments are supported by compelling and evidence-based rationales.
- Effective board governance and Ministry oversight of RPRA's finances and operations
- Consistently underspending its budget and

applying unspent funds to program surpluses that are then applied as future fee reductions.

These well-established internal practices and controls will continue to ensure all expenditures proposed in this business plan are made prudently. Additionally, RPRA has expanded its key performance and activity indicators, including a new set of customer service standards, to ensure accountability and demonstrate value to fee payers. These indicators will be further consulted on and expanded this year and next to sustain RPRA's commitment to public accountability and ensuring value for money to the regulated community, the Ontario government and the public.



## Accountability, transparency and value-for-money

Each year, the Resource Productivity and Recovery Authority (RPRA) is required under its legislative framework to publish a three-year business plan setting out the key activities and estimated resources required to deliver its mandate. This is RPRA's 10th 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 to municipalities, First Nations, the public, and the Minister of the Environment, Conservation and Parks, who oversees RPRA's activities.

The 2026-2028 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*. RPRA operates at arm's length from the Ontario government and is accountable to the Ontario Minister of the Environment, Conservation and Parks. RPRA also delivers digital reporting services 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 the businesses it regulates. RPRA does not receive any funding from the government.

Under the *Waste-Free Ontario Act, 2016*, RPRA is responsible for enforcing Ontario's producer responsibility regulatory framework for materials designated by the Ontario government, and for overseeing the wind up of legacy waste diversion programs.

Under the producer responsibility regulatory framework,

businesses that supply materials designated under the framework to consumers in Ontario are individually responsible for ensuring that their products and packaging are recovered and recycled or reused after consumers are finished with them in accordance with the requirements set out in regulation.

RPRA's role is to enforce the requirements of the producer responsibility regulatory framework and support businesses in meeting their regulatory responsibilities, while minimizing regulatory burden. RPRA also operates a registry system that regulated businesses must use to meet their registration and reporting obligations. RPRA 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, electronics, lighting, hazardous and special products (HSP), and Blue Box materials.

RPRA's mandate also includes building and operating digital reporting services on behalf of the Ontario Government. RPRA currently operates two digital reporting services for excess soil and liquid industrial and hazardous waste under the *Environmental Protection Act* (EPA). Enforcement related to these two programs is undertaken by the Ministry of the Environment, Conservation and Parks.

### Business plan development process

RPRA undertakes a robust process to develop its annual business plan, including consulting stakeholders throughout the business plan development process by sharing assumptions, the resourcing plan and proposed major activities and performance measures.

RPRA also formally engages with its Industry Advisory Council and Service Provider Advisory Council on the business plan. Additionally, RPRA consults with the ministry throughout the development of the business plan, but as an

## RPRA's role is to enforce the requirements of the producer responsibility regulatory framework and support businesses in meeting their regulatory responsibilities, while minimizing regulatory burden.

administrative authority RPRA sets its own budget, which is not subject to approval by the Minister.

RPRA's business planning process starts in the spring with RPRA's management and leadership team identifying activities required to achieve its strategic priorities, developing a resourcing plan, and exploring appropriate performance measures. Stakeholders and RPRA's Board are engaged throughout the summer. The business development process concludes in the fall with Board review and approval and submission to the Minister in October.

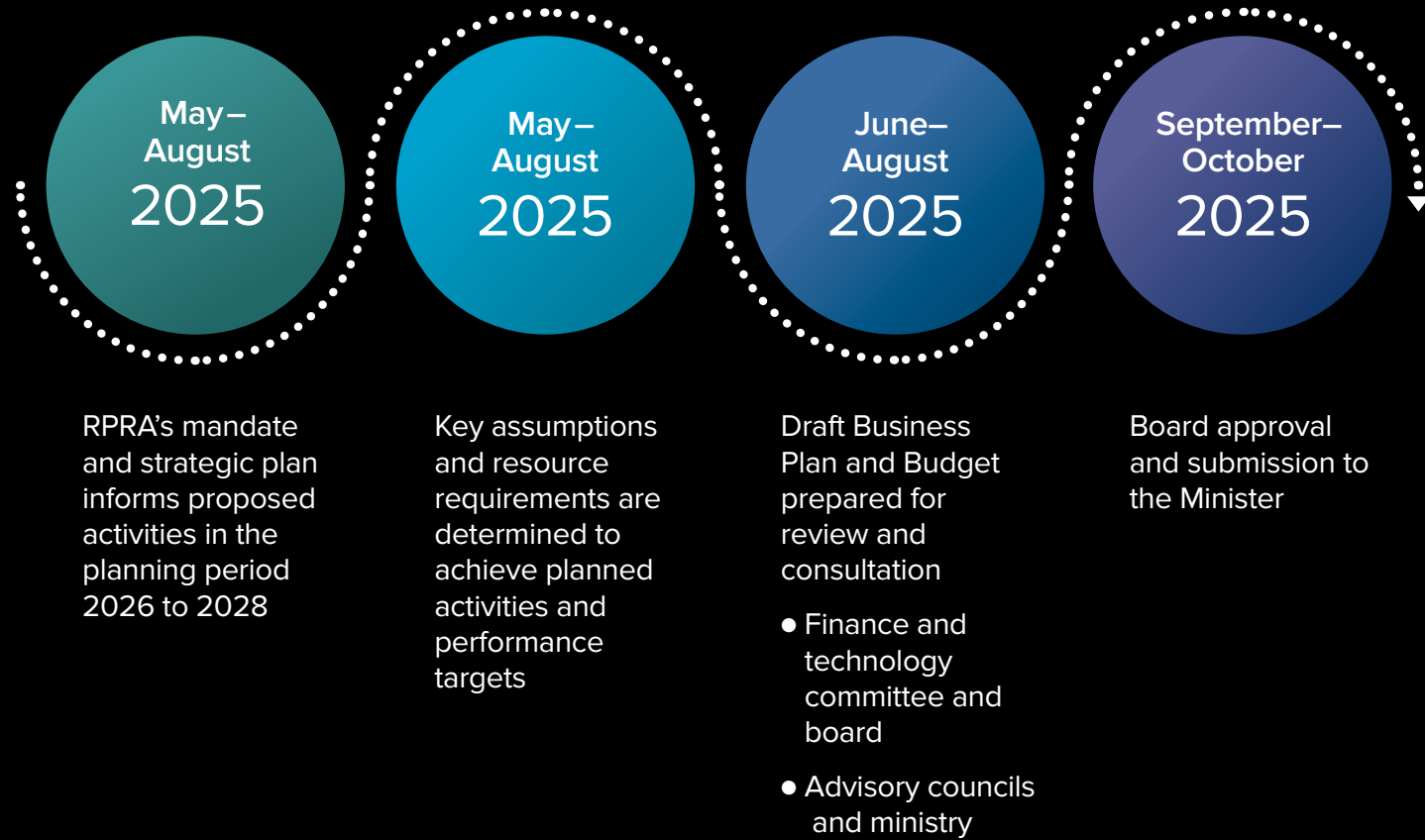
RPRA reports on its performance against its

business plan objectives and activities in its annual report. RPRA's 2026 Annual Report, which will be published on June 1, 2027, and includes audited financial statements for the 2026 fiscal year, will include an assessment of RPRA's performance for the first fiscal year set out in this three-year plan.

The results of RPRA's performance in achieving the objectives set out in the [2025 Business Plan](#) will be published in the 2025 annual report on June 1, 2026. On June 1, 2025, RPRA published its [2024 Annual Report](#), which reported on the objectives and activities outlined in its [2024 Business Plan](#).



## Business planning process



RPRAs mandate and strategic plan informs proposed activities in the planning period 2026 to 2028

Key assumptions and resource requirements are determined to achieve planned activities and performance targets

Draft Business Plan and Budget prepared for review and consultation

- Finance and technology committee and board
- Advisory councils and ministry

Board approval and submission to the Minister

## 2026-2028 strategic goals

RPRAs [Strategic Plan](#), which was published in October 2024, outlines the strategic framework for the annual business planning process for the period between 2025 and 2030, ensuring the activities and budget for each year are aligned with the strategic priorities of the organization.

The strategic plan lays out the following five strategic goals, and corresponding objectives and strategies, which are derived from RPRAs legislated mandate and rooted in RPRAs values and aligned with its mission and vision.

### Overview of planning assumptions

Each year’s business plan is designed around a set of assumptions relating to RPRAs operating environment. The assumptions for the 2026-2028 business plan include:

- No new materials are expected to be designated under the producer responsibility regulatory framework and no new directions from the Minister to build and operate digital reporting systems that would affect RPRAs operations during the business planning period.
  - Future government decisions, however, may require that the plan be revised.
- No new major registry portals are expected to be required during the business plan period.
  - Recent regulatory amendments to the RRCEA and Blue Box Regulation, however, are expected to require registry modifications with associated costs to RPRAs.
  - Investments in the current registry system will continue to be made to maintain and improve functionality and enhance user experience.
- RPRAs will continue to oversee the wind up of legacy waste diversion programs and the industry funding organizations that operated those programs.
  - Ontario Electronic Stewardship (OES) final liquidation assumed to occur in 2025.
  - Ontario Tire Stewardship (OTS) final liquidation assumed to occur in 2026.

- Stewardship Ontario (SO) final liquidation assumed to occur in 2026 following the end of the legacy Blue Box Program on December 31, 2025.

- The performance audit of RPRAs undertaken by the Office of the Auditor General of Ontario in 2025 is expected to result in recommendations related to service delivery and compliance that will require additional investments.
- Economic assumptions, including interest rates and inflation rates.

During the 2026-2028 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 on behalf of the ministry.

The table below sets out the approximate number of registrants in 2026. The number of registrants, along with data on the 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 2026	
Program	Registrants
Tires	493
Batteries	207
ITT/AV	304
Lighting	83
HSP	386
Blue Box	2,200
HWP	18,425
Excess Soil	529
<b>Total</b>	<b>22,627</b>

# RPRAs strategic goals, objectives and strategies



**GOAL 1**  
**Effective enforcement that supports waste reduction and a healthy resource recovery sector**

Make risk-informed decisions about compliance activities

Minimize burden on the regulated community while achieving compliance outcomes

Build trust with our regulated community

**GOAL 2**  
**Accessible registry services that provide value to registrants**

Provide responsive services that enable registrants to meet their regulatory requirements

Cost-effectively maintain and enhance usability, security and reliability of the registry

**GOAL 3**  
**Trusted and useful public information about resource recovery, waste and RPRAs activities**

Make registry information public by default, other than commercially sensitive information

Present reliable information to support the needs of registrants, the government, other stakeholders and the public

Transparently communicate our operational decisions and activities

**GOAL 4**  
**A connected culture where employees can grow and do meaningful work**

Create a supportive inclusive and trust-base work environment

Empower RPRAs employees to innovate, adapt to change, and perform at the leading edge

**GOAL 5**  
**Robust internal systems and processes that remain innovative and adaptable to change**

Embed data-informed decision-making in all operations

Continuously improve technology, and systems to drive efficiency and effectiveness

Refine a planning framework that increases alignment, prevents redundancy and fosters innovation

The 2026 Business Plan builds on the strong foundation RPRAs has built over the past decade and enhances its capacity to deliver tangible environmental and economic benefits.

The total number of registrants in each program is expected to stay the same in 2027 and 2028, except for minor variances due to businesses entering and exiting the market, and free riders being brought into compliance. The total number of inspection cases, however, is expected to

continue to increase as the Compliance and Enforcement team continues to proactively engage non-compliant registrants. Should any of the key assumptions underlying this plan change, the priorities, objectives and activities outlined in this plan will be adjusted as required.





## Up-front investments, downstream cost savings

This plan sets out a budget for 2026 and forecasts for 2027 and 2028. As detailed in the financial section of this plan, the 2026 budget of \$29.7M represents a 9% increase above the 2025 budget of \$27.2M. A full 6% of the year-over-year increase is a result of additional strategic investments in staff and professional services to support emerging enforcement, verification, and related compliance needs for the Blue Box Program. The remaining 3% year-over-year increase includes contingency amounts to address, if necessary, potential recommendations from the Auditor General’s ongoing performance review of RPRA, which is expected to conclude at the end of 2025. The increase also includes inflationary impacts and focused spending directly related to supporting the activity and performance commitments in this business plan.

The 2027 forecast provides for an increase of 7% over the 2026 budget. The 2028 forecast provides for an increase of 5% over the 2027 forecast.

These projected increases are based on the full annualized accounting for the Blue Box-related investments that begin in 2026, plus an anticipated need for additional investments to ensure RPRA

can deliver on its strategic priorities and meet the expectations of registrants, the Ontario government, stakeholders, and the public, as well as economic assumptions (e.g., inflation and interest rates).

The Blue Box Program is still transitioning to the full producer responsibility framework, the regulation was recently amended, and the program is currently experiencing significant escalation in material management costs for producers. The increased investments during the 2026-2028 business planning period primarily address emerging needs identified by several Blue Box Program stakeholders for RPRA to make new investments in its compliance and enforcement activities, in particular its audit and verification function, to help identify free riders and verify the accuracy of both supply and performance reporting.

New data RPRA has received through first-time performance reporting in the Blue Box Program in 2025 also points to the need for additional and accelerated audit, verification and related enforcement activities, both to help the program fully transition to the new producer responsibility framework, and to help ensure that all program participants have access to trusted and accurate data.

### 2026 budget and 2027-28 forecasts

(in Millions)	2024 Actual	2025 Business Plan		2026 Business Plan		
		2025 Approved Budget	Last year’s 2026 Forecast	2026 Budget	2027 Forecast	2028 Forecast
Total Revenue Requirement (including reserve recoveries)	\$22.7M	\$27.2M	\$28.6M	\$29.7M	\$31.7M	\$ 33.1M
% increase			5% over 2025 Budget	9% over 2025 Budget	9% over 2026 Budget	5% over 2027 Forecast

## 05 FINANCIAL OVERVIEW

Enhancing the compliance department's verification and audit function will also reduce burden on Blue Box producers by reducing requirements for producers to submit audit reports and ensuring system costs are fairly distributed across the producer community.

Investing in RPRA's internal audit and verification function will support RPRA's strategic plan goals and will allow RPRA's compliance team to accelerate its preexisting strategy to enhance verification and audit and fully implement its risk-based compliance plan.

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 reduce waste in Ontario and the province closer towards a circular economy.

### 2026 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 are 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 its 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 based on the number of tires they supply. Small producers that supply material in quantities less than a defined threshold pay a nominal 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.

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 during the start-up period for new programs; 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 require 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. RPRA will initiate a review of its fee setting methodology in 2025 and explore options to set fees on a multi-year basis, which would allow fees to be set once every few years rather than annually, once all program transitions are completed in 2026.

## 05 OVERVIEW OF PROGRAMS

# EPR and digital reporting programs

### 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 their 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.

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 except Blue Box have completed their transition to the new producer responsibility regulatory framework. In the case of the Blue Box Program, the final tranche of affected municipalities and First Nations communities are set to exit the legacy program by December 31, 2025, at which time the transition will be completed.

### 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 liquidation process. RPRA continues to oversee these IFOs until final liquidation.

Final liquidation of Ontario Electronic Stewardship (OES) is anticipated to occur sometime in 2025, and final liquidation of Ontario Tire Stewardship (OTS) is expected to occur in 2026. Stewardship Ontario, the IFO responsible for the legacy Blue Box Program, as well as the transitioned MHSW program (now HSP), is anticipated to wind up in 2026 following the transition of the final tranche of communities from the legacy Blue Box Program to the new producer operated Blue Box Program is completed on December 31, 2025 and the remaining steps of the approved wind up plan have been completed.

### 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.

Since January 1, 2023, construction and development project leaders and operators/owners of soil reuse sites, and residential development soil depot sites must file notices about how they reuse and dispose of excess soil in compliance with Ontario's Excess Soil Regulation. The ministry is responsible for conducting compliance and enforcement activities under the regulation.

# RPRA's mandate and governance

## Role and legislated mandate

The Government of Ontario established RPRA on November 30, 2016, with the 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 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 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.





## Strategic investments for smart enforcement

RPRA's 2026 strategic priorities reflect RPRA's primary responsibilities and guide RPRA's focus and allocation of resources. RPRA's strategic priorities were reviewed and presented in its first strategic plan published in October 2024.

The charts below present RPRA's key activities for 2026, organized according to the strategic goals

and objectives. Key activities represent initiatives or projects RPRA plans to launch or complete in 2025, in addition to ongoing operations. Progress toward achieving these strategic objectives is measured by the key performance metrics and activity indicators listed, which will be reported in the 2026 Annual Report.

### Strategic Goal 1:

#### Effective enforcement that supports waste reduction and a healthy resource recovery sector

Objectives:

- Make risk-informed decisions about compliance activities
- Minimize burden on the regulated community while achieving compliance outcomes
- Build trust with our regulated community

ID	Business Plan Activities	Planned Outcomes
1.1	Develop and consult on an updated risk-based compliance framework	Increase consistency and transparency in compliance planning and operations by utilizing a risk-based compliance framework to align enforcement activity with level of risk.
1.2	Review registry procedures to identify opportunities for operational efficiencies	Minimize burden on the regulated community by eliminating redundancies in registry processes to improve the quality and efficiency of reporting registry data.
1.3	Operationalize the Canadian EPR Regulators Forum	Minimize burden for multi-jurisdictional registrants through knowledge sharing with other Canadian EPR regulators to strengthen cross-jurisdictional collaboration.
1.4	Implement learning and knowledge management initiatives	Improve registrant services by obtaining institutional knowledge, and improving staff onboarding, training, and collaboration to build organizational capability.
1.5	Build out the audit and verification program	Support risk-informed enforcement through expansion of audit and verification tools and processes which enable consistent and trusted oversight.

## 08 2026 BUSINESS PLAN ACTIVITIES

### Strategic Goal 2:

#### Accessible registry services that provide value to registrant

##### Objectives:

- Provide responsive services that enable registrants to meet their regulatory requirements
- Cost-effectively maintain and enhance usability, security and reliability of the registry

ID	Business Plan Activities	Planned Outcomes
2.1	Assess technology delivery approach for supporting the delivery of technical enhancements and develop a strategy to implement opportunities for improvements	Increase efficiency, cost-effectiveness, and business operational stability in approach to deliver technology services and improvements by identifying more effective end-to-end development approaches and partnerships to optimize the delivery of technical enhancements and services.

### Strategic Goal 3:

#### Trusted and useful public information about resource recovery, waste and RPRAs activities

##### Objectives:

- Make registry information public by default, other than commercially sensitive information
- Present reliable information to support the needs of registrants, the government, other stakeholders and the public
- Transparently communicate our operational decisions and activities

ID	Business Plan Activities	Planned Outcomes
3.1	Implement process and technology changes based on collection system regulatory amendments and user feedback to Collection Site Map	Ensure that RPRAs systems and processes reflect legislative requirements and user expectations by incorporating user feedback and supporting regulatory changes.
3.2	Increase accessibility and impact of publicly reported registry data for both registrants and the public	Increase timeliness, accessibility and impact of reporting on supply and recovery of regulated materials and on Excess Soil and HWP data through new dashboards and/or other data presentations on RPRAs.ca.
3.3	Develop and implement a RPRAs mission-focused awareness and outreach strategy to support compliance and registrant needs	Increase compliance and registrant support through proactive outreach to increase understanding of compliance requirements.
3.4	Develop PRO collaboration strategy	Increase compliance and operational efficiency through consistent C4C engagement with PROs to enhance understanding of compliance requirements.
3.5	Consult on fee methodology and implement recommendations	Increase clarity and predictability in fee structures through implementation of fee methodology improvements in consultation with stakeholders which reduce fee fluctuations, enhance registrant understanding of RPRAs program fee models and ensure long term financial sustainability.

## 08 2026 BUSINESS PLAN ACTIVITIES

### Strategic Goal 4:

#### A connected culture where employees can grow and do meaningful work

##### Objectives:

- Create a supportive, inclusive and trust-based work environment
- Empower RPRAs employees to innovate, adapt to change, and perform at the leading edge

ID	Business Plan Activities	Planned Outcomes
4.1	Implement engagement, inclusion equity and diversity strategies aligned with employee feedback and metrics	Strengthen workplace culture by implementing inclusive practices based on employee input which foster a supportive, inclusive and trust-based work environment.
4.2	Advance the development and plan for a phased implementation of a redesigned performance management framework	Support professional growth by advancing the development and planning for a phased implementation of a redesigned performance management framework, including processes, tools and competencies which will enhance the employee experience and organizational performance.

### Strategic Goal 5:

#### Robust internal systems and processes that remain innovative and adaptable

##### Objectives:

- Embed data-informed decision-making in all operations
- Continuously improve technology, processes, and systems to drive efficiency and effectiveness
- Refine a planning framework that increases alignment, prevents redundancy and fosters innovation

ID	Business Plan Activities	Planned Outcomes
5.1	Develop a prioritization roadmap for Auditor General recommendations and commence implementation	Support organization governance model by prioritizing and addressing audit findings efficiently and effectively to enable continuous organization improvement.
5.2	Plan and implement cost effective process and technology enhancement opportunities	Increase operational efficiency and effectiveness by delivering targeted technology improvements that address regulatory needs, reduce burden, improve the user experience and align with business needs.

## 2026 key performance measures

RPRA continues to evolve its key performance indicators and activity indicators to measure its performance, effectiveness and efficiency based on stakeholder feedback, public consultations, availability of data, and operational focus.

RPRA is consulting on additional performance metrics related to service delivery in 2025 and some

of the metrics and indicators noted below may be revised based on the outcomes of the consultation and/or new metrics and indicators may be added.

RPRA reports on its KPIs and activity indicators annually in its annual reports, as well as online through the Public Reports section of its corporate website.

### Strategic Goal 1:

#### Effective enforcement that supports waste reduction and a healthy resource recovery sector

Key Performance Indicator	2026 Forecast/Target
<b>Producer Supply Reporting</b> % of high priority producer supply reports submitted within expected timelines “high priority” refers to producers who made up 80% of the aggregate market share by supply reported in the previous year	95%
<b>Producer Performance Reporting</b> % of high priority producer performance reports submitted within expected timelines “high priority” refers to producers who make up 80% of the aggregate market share by management/collection requirement for the current year	95%
<b>PRO Performance Reporting</b> % of required PRO performance reports completed within expected timelines	95%
<b>Service Provider Performance Reporting</b> % of overall SP performance reports completed within expected timelines	80%
<b>Free Rider Index</b> % of all substantiated high priority free-rider cases closed or escalated for enforcement consideration within 9 months	100%

### Key Activity Indicator

#### Number of registered producers

The number of producers and producer responsibility organizations (PROs) registered for each program.

#### Open inspection cases (as of December 31)

Number of open inspection cases as of December 31, for any instance of potential non-compliance, such as free-riding, incorrect reporting, incomplete or late reporting, or failure to pay RPRA program fees. Cases may have been opened prior to January 1 of the given year.

#### Non-compliance cases opened annually

Number of new inspection cases opened wherein, after investigation of potential non-compliance, a contravention of the producer responsibility regulations under the RRCEA is reasonably suspected.

#### Non-compliance cases closed annually

Number of inspection cases closed wherein, after investigation of potential non-compliance, a contravention of the producer responsibility regulations under the RRCEA is reasonably suspected.

#### In-year resolution rate for non-compliance cases opened

Inspection cases where, after investigation, a contravention of the producer responsibility regulations is reasonably suspected.

#### Open potential free rider cases (as of December 31)

Open cases as of December 31 that consist of a potential failure to register with RPRA as a producer labeled under the program under which they have potential obligations.

#### Free rider cases closed annually

Sum of potential free rider cases closed that were brought into compliance and potential free rider cases closed due to deemed not obligated in a given year.

#### Supply report submission rate

The percentage of registered producers that submitted supply reports by the end of a given year.

#### Compliance/Administrative Penalty (AP) Orders Performance

% of Compliance/AP orders resolved within expected timeframes.

## 08 2026 BUSINESS PLAN ACTIVITIES

### Strategic Goal 2:

#### Accessible registry services that provide value to registrant

Key Performance Indicator	2026 Forecast/Target
<b>Overall Performance KPI</b> Registrants' perception overall RPRA performance via annual survey	7/10
<b>Average Speed of Answer</b> Average time it takes an officer to answer an incoming call	3 min
<b>First Contact Resolution</b> % of cases resolved on first interaction	80%
<b>General Inquiry Case Index</b> % of general inquiry cases resolved within 3 days	80%
<b>Registry Availability</b> % uptime of Registry system	99%
<b>Registry Services KPI</b> Registrants' perception of useability of the registry system via annual survey	7/10

### Key Activity Indicator

**Compliance interactions**  
Incoming and outgoing phone calls and emails with RPRA's Compliance and Registry Team.



## 08 2026 BUSINESS PLAN ACTIVITIES

### Strategic Goal 3:

#### Trusted and useful public information about resource recovery, waste and RPRA activities

Key Performance Indicator	2026 Forecast/Target
<b>Consultation Performance KPI</b> Registrants' perception RPRA's delivery of consultations via annual survey	7/10
<b>Timeliness of EPR program annual supply/recovery metrics</b> Time to publish EPR program metrics from program reporting deadlines	3 months
<b>Public Reporting KPI Result</b> Registrants' perception of RPRA's public reporting via annual survey	7/10
<b>Education &amp; Awareness KPI Result</b> Registrants' perception of RPRA communications and communications products via annual survey	7/10

### Strategic Goal 4:

#### A connected culture where employees can grow and do meaningful work

Key Performance Indicator	2026 Forecast/Target
<b>Annual Employee Engagement Score</b> % of employees responding favorably via annual employee engagement survey	80%
<b>Diversity, Equity and Inclusion (DEI) Score</b> % of employees responding favorably to RPRA's dedication to DEI via annual employee engagement survey	80%

### Strategic Goal 5:

#### Robust internal systems and processes that remain innovative and adaptable

Key Performance Indicator	2026 Forecast/Target
<b>Financial Stability Metric</b> Budget to actual expenses	< 10%
<b>Billing Performance</b> Billings compared to Revenue Requirement Target by program	+/- 10%

## Resourcing for mandate delivery

### Approach

RPRA's financial planning process is overseen by RPRA's 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
- Proactive and transparent stakeholder engagement
- Transparency and cooperation with the ministry to ensure effective oversight
- Public reporting on RPRA performance
- Procurement policies and procedures

RPRA has also embedded rigorous cost controls including the requirement for business cases for certain 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

2026 is the fourth 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).

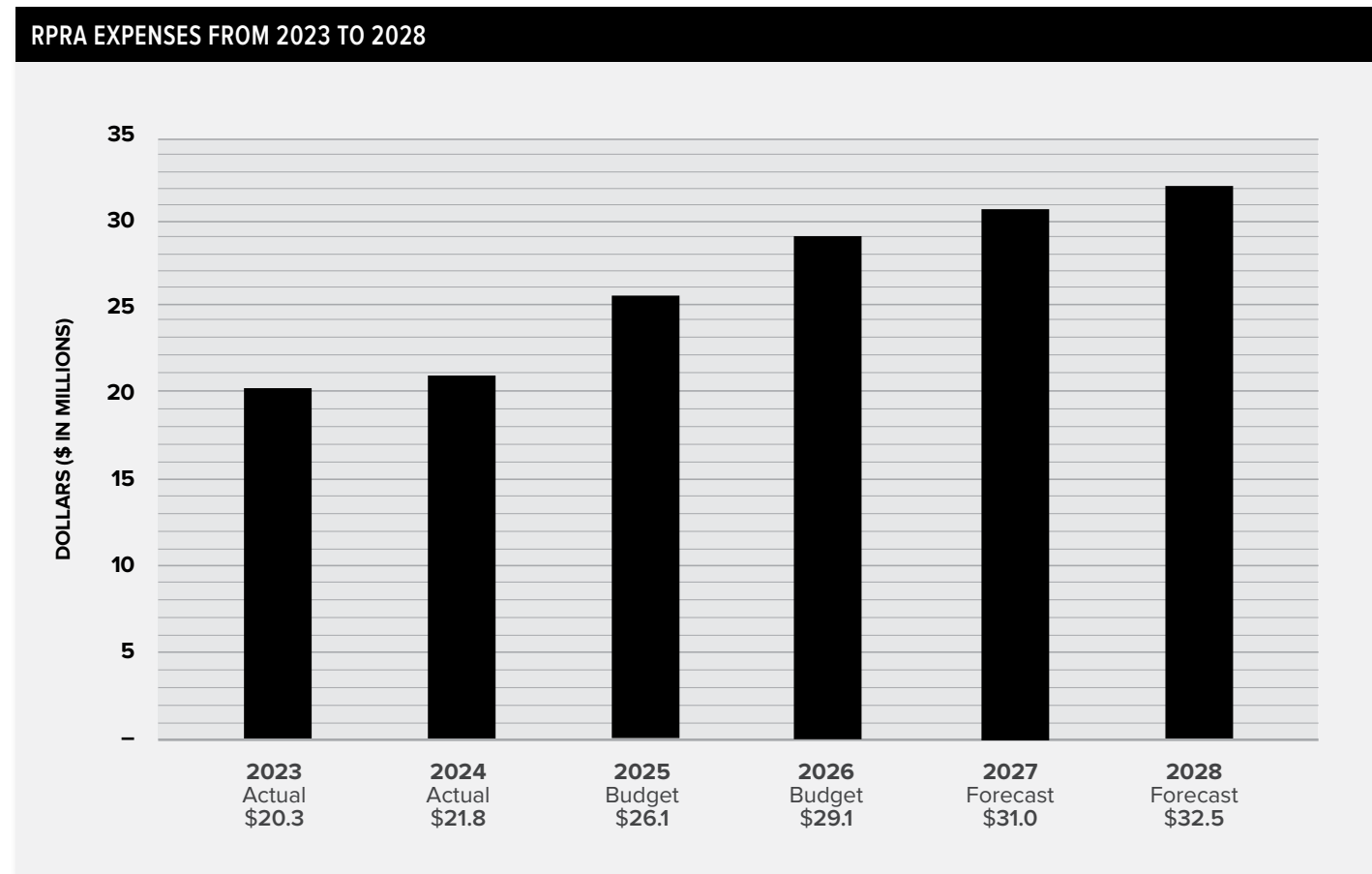
RPRA's 2026 total revenue requirement of \$29.7M is \$1.1M (4%) higher than the 2026 forecast published in the 2025 business plan and includes budgeted expenses of \$29.1M and an operating reserve contribution of \$0.6M. The year-over-year planned increase of approximately \$2.5M, a 9% increase over the 2025 revenue requirement, includes a \$1.6M investment, which represents 6% of the year-over-year increase, to support increased compliance activities related directly to the Blue Box Program and accounts for inflation impacts plus investments to directly support RPRA's registrant-focused mission and strategic goals. The additional compliance and audit and risk staff and professional fees budgeted in 2026 will support the verification and audit of Blue Box producers submitted supply and performance reports. This investment will help ensure a level playing field by assisting in the identification of free riders, supporting producers in making accurate deductions in supply reporting, and enhancing the accuracy of RPRA's public reporting.

As outlined in the graph and chart below, RPRA's 2026 budgeted expenses of \$29.1M have increased by 43.1% since 2023, commensurate with the additional resources and technology investments required by its expanded mandate to deliver the HWP and Excess Soil registries, and for the implementation of maturing producer responsibility programs.

## 08 FINANCIAL PLAN

Most of the increased investments in 2026 is in increased compliance activities related directly to the Blue Box Program to ensure a level playing field, identify free riders, support producers with deductions, audit and verification, and enhance public reporting

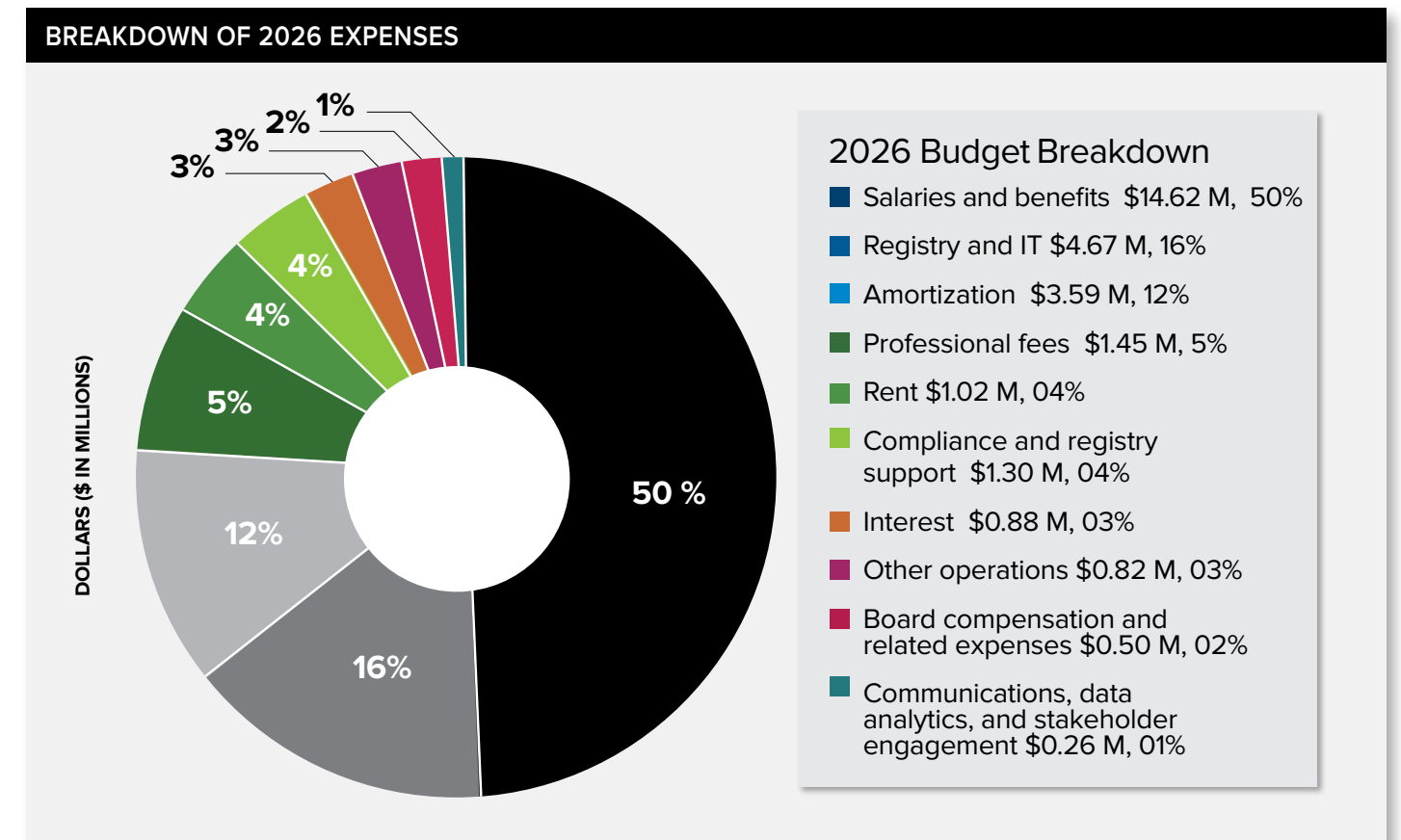
The graph below shows RPRA expenses from 2023 to 2028.



## 08 FINANCIAL PLAN



The pie chart below shows the breakdown of 2026 expenses.



## 08 FINANCIAL PLAN

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

2025 TO 2028 BUDGETS AND FORECASTS					
In millions \$	2025 Business Plan	2026 Business Plan			
	2025 Budget	2026 Budget	25B-26B \$ Change	2027 Forecast	2028 Forecast
<b>Revenue</b>					
Cost recovery	\$ 26.1	\$ 29.1	\$ 3.0	\$ 31.0	\$ 32.5
Recovery of reserve contribution	1.0	0.5	(0.5)	0.5	0.5
Recovery of start-up costs	0.1	0.1	–	0.1	0.1
Interest income	0.2	0.3	0.1	0.3	0.3
Recovery of prior year's expenses	0.3	0.3	–	–	–
<b>Total revenues</b>	<b>\$ 27.7</b>	<b>\$ 30.3</b>	<b>\$ 2.6</b>	<b>\$ 31.9</b>	<b>\$ 33.4</b>
<b>Total expenses – direct, indirect, and shared</b>					
Salaries and benefits	\$ 12.9	\$ 14.6	\$ 1.7	\$ 15.7	\$ 16.8
Communications, data analytics & stakeholder engagement	0.3	0.3	–	0.3	0.3
Amortization	3.3	3.6	0.3	3.9	4.0
Board compensation and related expenses	0.5	0.5	0.0	0.5	0.5
Office lease and related expenses	0.9	1.0	0.1	0.7	0.7
Interest	1.2	0.9	(0.3)	0.7	0.6
Other operating	0.8	0.8	0.0	0.8	0.9
Professional fees	1.0	1.4	0.4	1.9	2.3
Compliance and registry support	0.8	1.3	0.5	1.1	1.1
Registry and IT	4.4	4.7	0.3	5.5	5.3
<b>Total Expenses (Direct and Common)</b>	<b>\$ 26.1</b>	<b>\$ 29.1</b>	<b>\$ 3.0</b>	<b>\$ 31.1</b>	<b>\$ 32.5</b>
Excess of revenues over expenses	1.6	1.2	(0.4)	0.9	0.9
<b>Total expenses</b>	<b>\$ 26.1</b>	<b>\$ 29.1</b>	<b>\$ 3.0</b>	<b>\$ 31.1</b>	<b>\$ 32.5</b>
<b>Add: Reserve recovery and RRCEA start up recovery</b>	<b>1.1</b>	<b>0.6</b>	<b>(0.5)</b>	<b>0.6</b>	<b>0.6</b>
<b>Total revenue requirement (including contribution to reserve and RRCEA start up deficit)</b>	<b>\$ 27.2</b>	<b>\$ 29.7</b>	<b>\$ 2.5</b>	<b>\$ 31.7</b>	<b>\$ 33.1</b>

The key drivers of the budget increase from 2025 to 2026 are:

- Ten additional FTEs to enhance RPRa's audit, verification and enforcement-related activities, to be hired in phases as needed over the course of 2026, and 4-5 additional contract staff to support known temporary leaves, project related workload demands from 2025 that will carry into 2026.
- Additional investment in technology and registry related activities, including system and business process enhancements, and professional services aligned to RPRa's strategic priorities.

The excess of revenues over expenses is forecasted to decrease from \$1.6M in 2025 to \$1.2M in 2026 primarily due to a decreased reserve contribution. The reserve contribution is being lowered to reduce burden on registrants during the current period of economic uncertainty. Although the reserve remains below the 50% of annual operating costs allowed under the reserve policy, the reserve is sufficient to address operational cash flow requirements as well as unanticipated revenue risks. There is also a forecasted decrease in 2027 and 2028 as the HWP start up deficit is fully recovered.

## 08 FINANCIAL PLAN

### Revenue

As authorized by its legislated mandate, the cost of RPRa's 2026–2028 activities will be funded 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 through registrant fees only; fees recovered from industry funding organizations under the WDTA are not used to fund registry capital expenses.

The estimated revenues from industry funding organizations under the WDTA reflect the key wind-up assumptions and WDTA-related activities outlined in the program overview section of this plan. WDTA costs will continue to be recovered from IFOs until wind up of the associated program

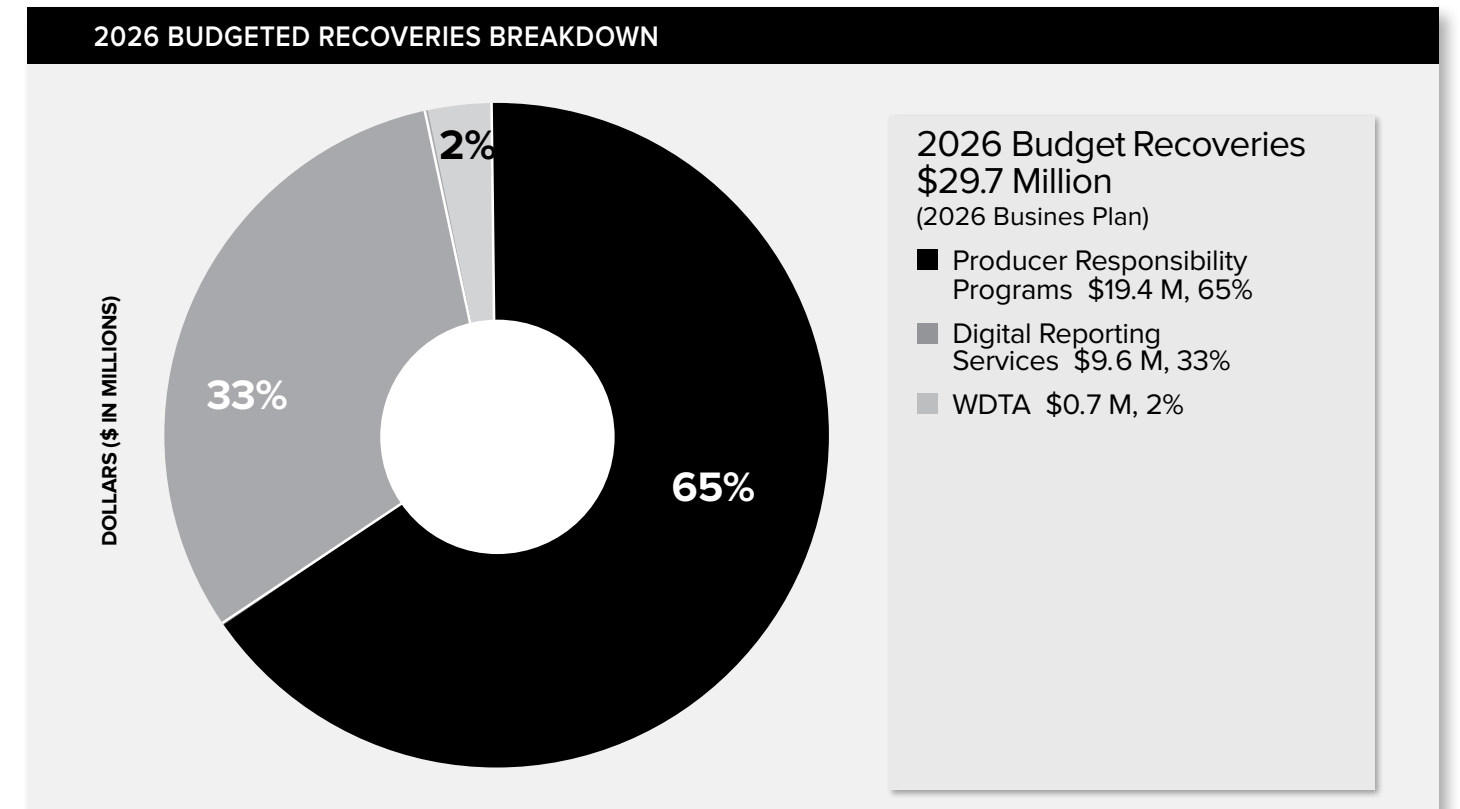
and liquidation of the organization is complete.

The estimated revenues from regulated parties and registrants under the RRCEA and EPA reflect the forecasted number of registrants outlined previously. These revenues are derived through program fees. Commencing in 2026, ITT-AV fees will be nil and the revenue requirement will be recovered from a drawdown of the surplus funds held by RPRa that were transferred from Ontario Electronic Stewardship.

Additional revenues may be received from administrative penalties. In 2024, RPRa consulted stakeholders on a policy for the use of funds from administrative penalties. Application of any revenues derived through administrative penalties will commence when setting 2027 fees.

As illustrated in the chart below, approximately 65% or \$19.4M of RPRa's 2026 budget will be recovered from producer responsibility programs, 33% or \$9.6M will be recovered from the Excess Soil and HWP programs, and the balance of \$0.7M (2%) will be recovered from WDTA programs.

The pie chart below shows a breakdown of 2026 budgeted recoveries





As shown in the table below, by 2027 the forecasted portion to be recovered from WDTA fees will decrease to 0%, and the producer responsibility program and digital reporting share of the recoveries will increase.

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 2028

In millions \$	REVENUE REQUIREMENT BY MANDATED SERVICE 2024-2028										
	2026 Business Plan										
	2024 Actual	2025 Budget	2026 Budget	2026B -2025B \$Change	%Change	2027 Forecast	2027F -2026B \$Change	%Change	2028 Forecast	2028F -2027F \$Change	%Change
<b>Estimated recovery by mandated services</b>											
Producer Responsibility Programs (Tires, batteries, lighting, ITT/AV, HSP, and BB)	\$13.6	\$16.8	\$19.4	\$ 2.63	16 %	\$ 21.2	\$ 1.8	9 %	\$ 22.3	\$ 1.0	5 %
Digital Reporting Services (HWP and ES)	7.8	9.2	9.6	0.46	5	10.4	0.8	9	10.9	0.4	4
WDTA	1.3	1.3	0.7	(0.6)	-47	-	(0.7)	-100	0.0	-	0
<b>Total Revenues Requirement (including contribution to reserve, start up deficit)</b>	<b>\$ 22.7</b>	<b>\$ 27.2</b>	<b>\$ 29.7</b>	<b>\$ 2.49</b>	<b>9%</b>	<b>\$ 31.7</b>	<b>\$ 2.0</b>	<b>7 %</b>	<b>\$ 33.1</b>	<b>\$ 1.5</b>	<b>5 %</b>

**Human resources**

RPRA's staffing plans are based on the level of service required to support 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, and related public reporting. 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 increase, requiring greater expertise and staff time to execute effectively.

The 2026 budget includes 101 permanent FTEs, ten more than in 2025. The additional FTEs are required to provide additional compliance capacity to support the Blue Box Program. The new staff will be hired in phases over the course of 2026 as the audit and verification function is built out in accordance with 2026 business plan commitments. New hires will only be made as necessary to deliver on business plan commitments and performance measures. The 2026 budget also includes

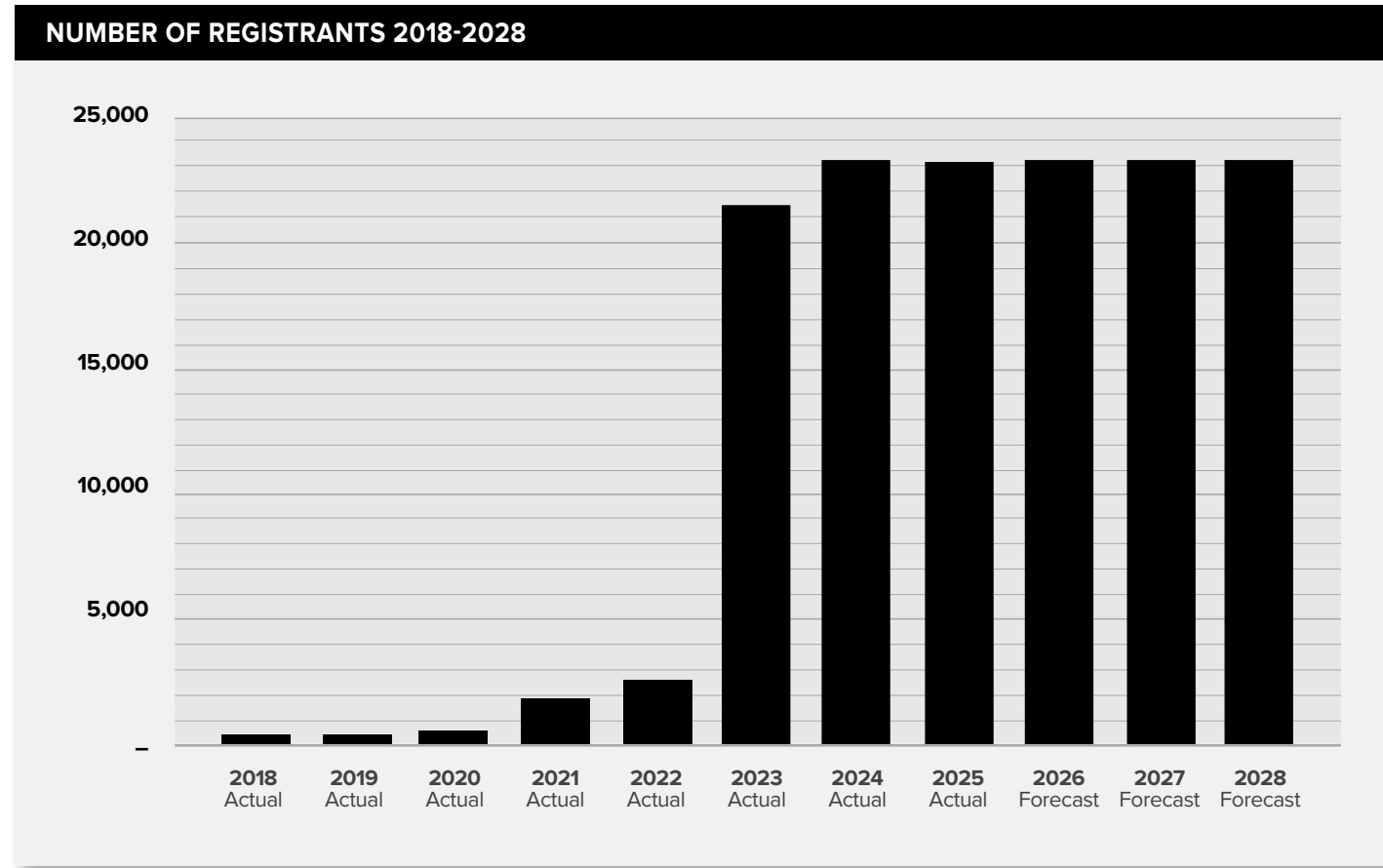
FTEs for temporary contract positions, which fluctuate based on operational needs and leave replacements.

The graphs below 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 2028. The number of programs, registrants and interactions stabilized after 2022 after large increases because of new producer responsibility programs coming online between 2019 and 2022, and the implementation of the HWP Registry in 2023. However, the number of inspections, which typically represent more complex interactions, increased significantly from 2023 on as the compliance team began to ramp up enforcement.

Human resource needs for 2026 and beyond will be driven less by increases in the numbers of registrants and interactions and the need to enhance service delivery improvements, the transition of the Blue Box Program, audit and verification needs, and the complexity of compliance activities.

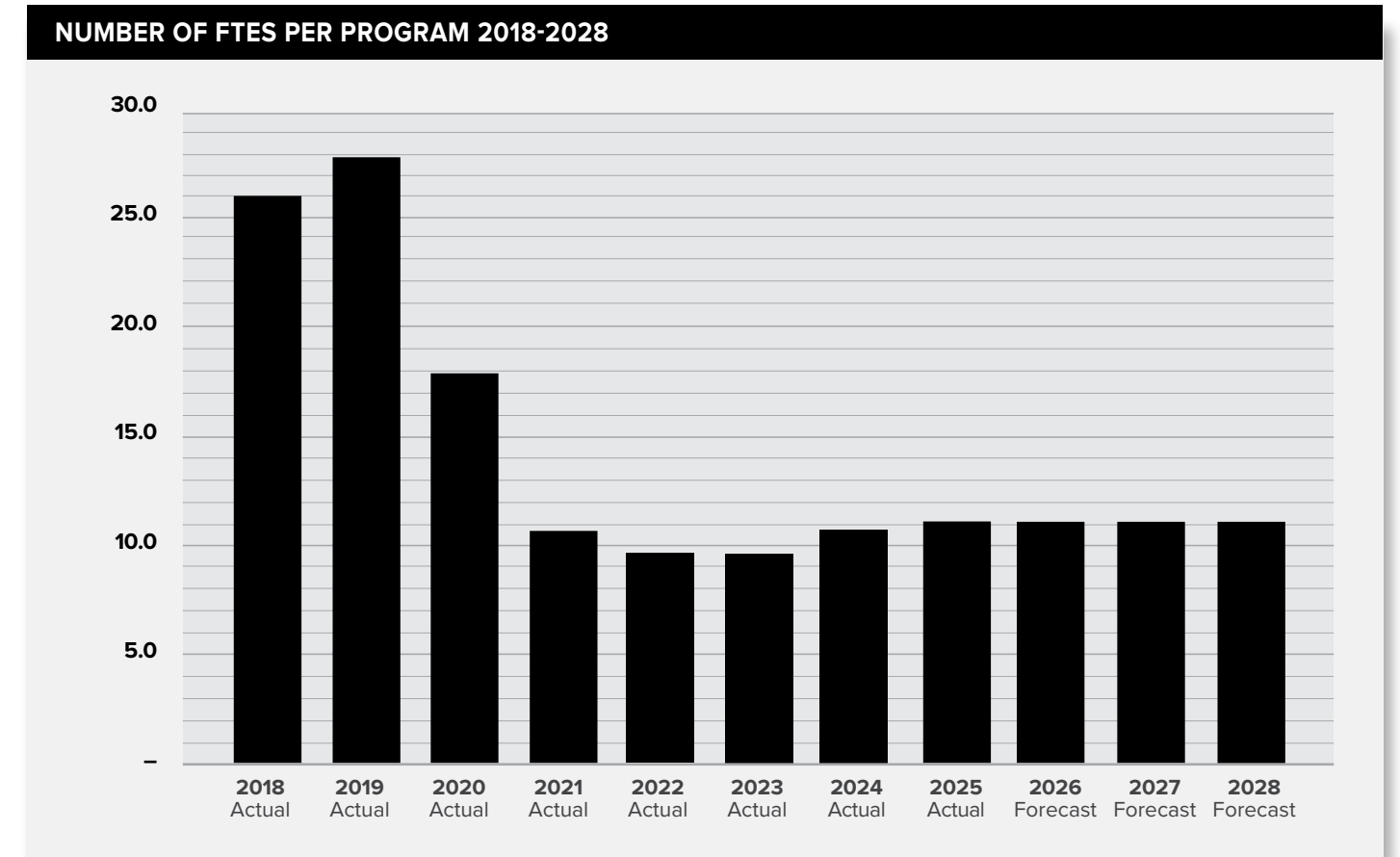
## 08 FINANCIAL PLAN

The graph below shows the increase in the number of registrants between 2018 and 2028.



## 08 FINANCIAL PLAN

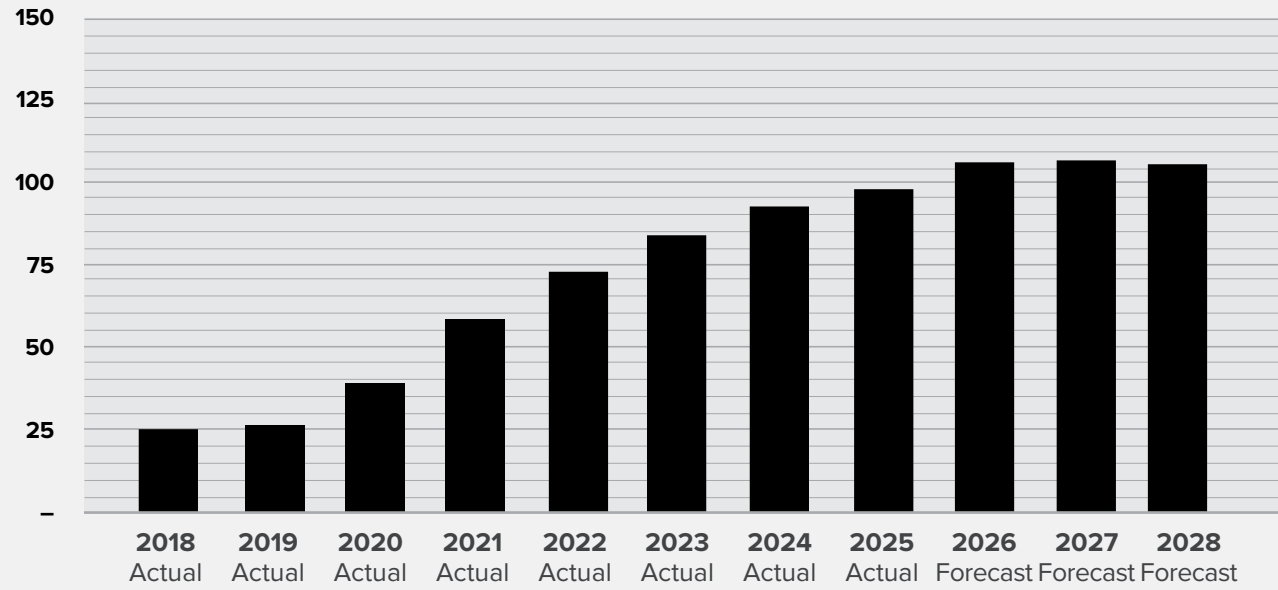
The following graph shows the number of FTEs per program between 2018 and 2028



## 08 FINANCIAL PLAN

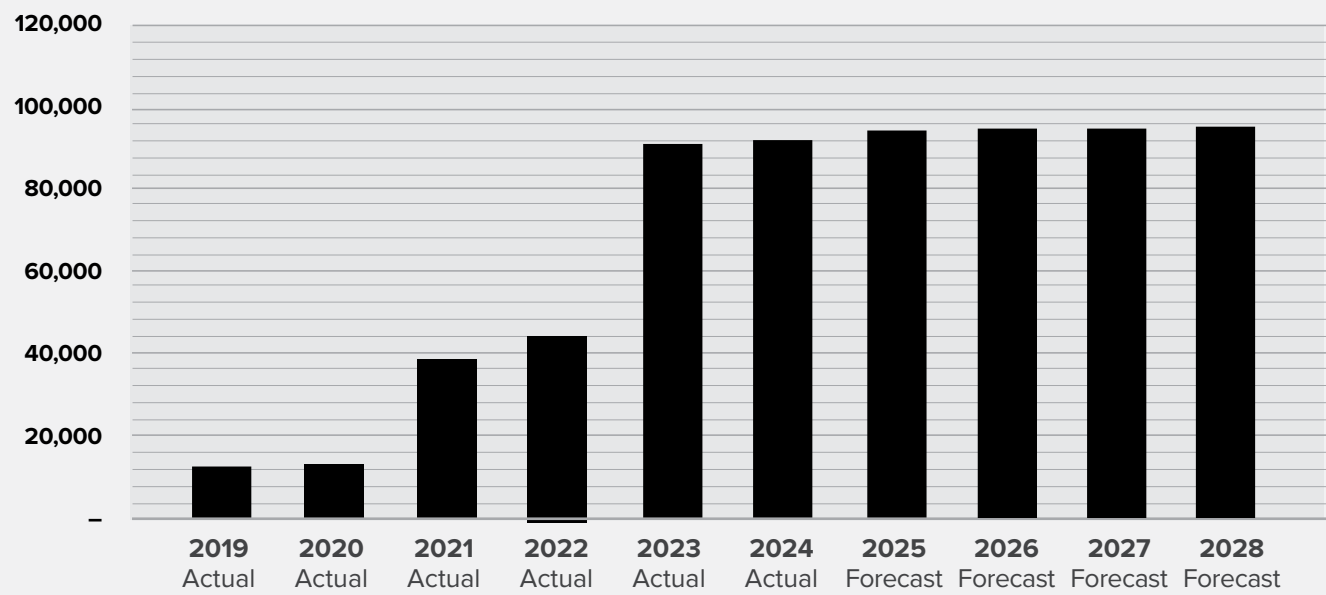
The figures below show the Number of total FTEs per year from 2018 to 2028

**NUMBER OF TOTAL FTES PER YEAR 2018-2028**



The figures below show the increase in the number of interactions between RPRA staff and registrants since 2019.

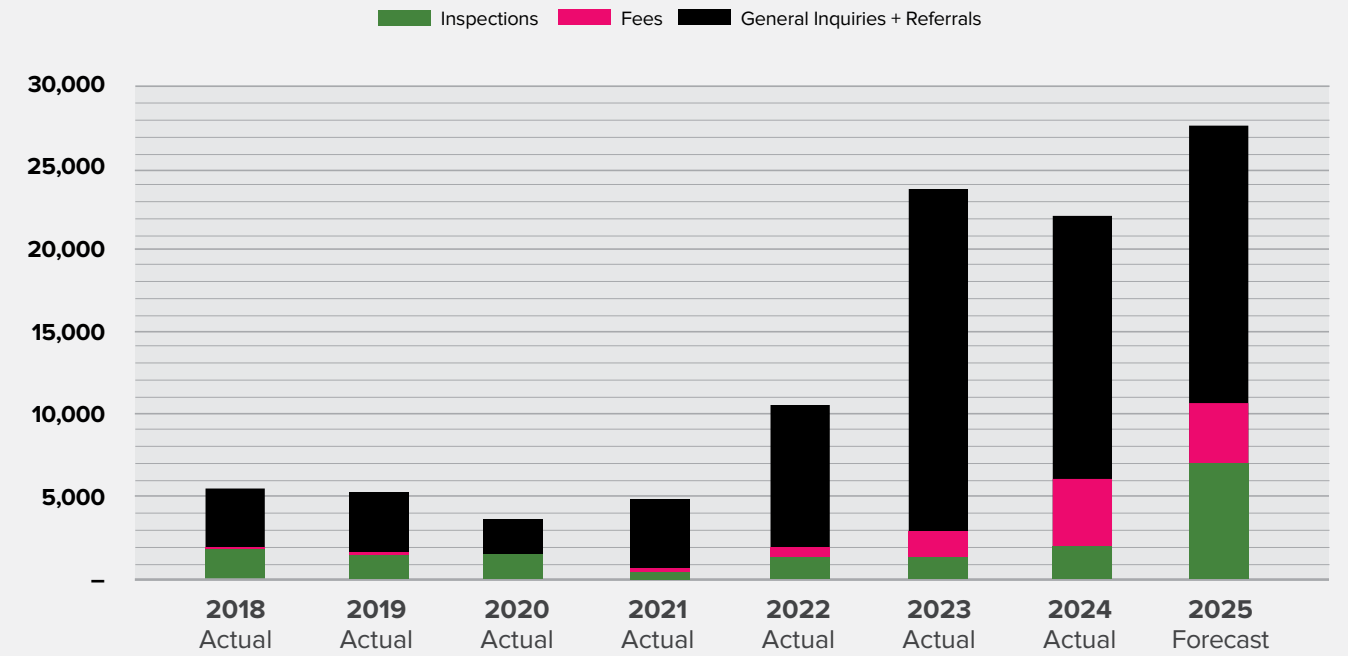
**RPRA STAFF INTERACTIONS 2019-2028**



## 08 FINANCIAL PLAN

The graph below shows the increase in the number of compliance cases since 2018.

**RPRA COMPLIANCE CASE LOAD 2018-2025**

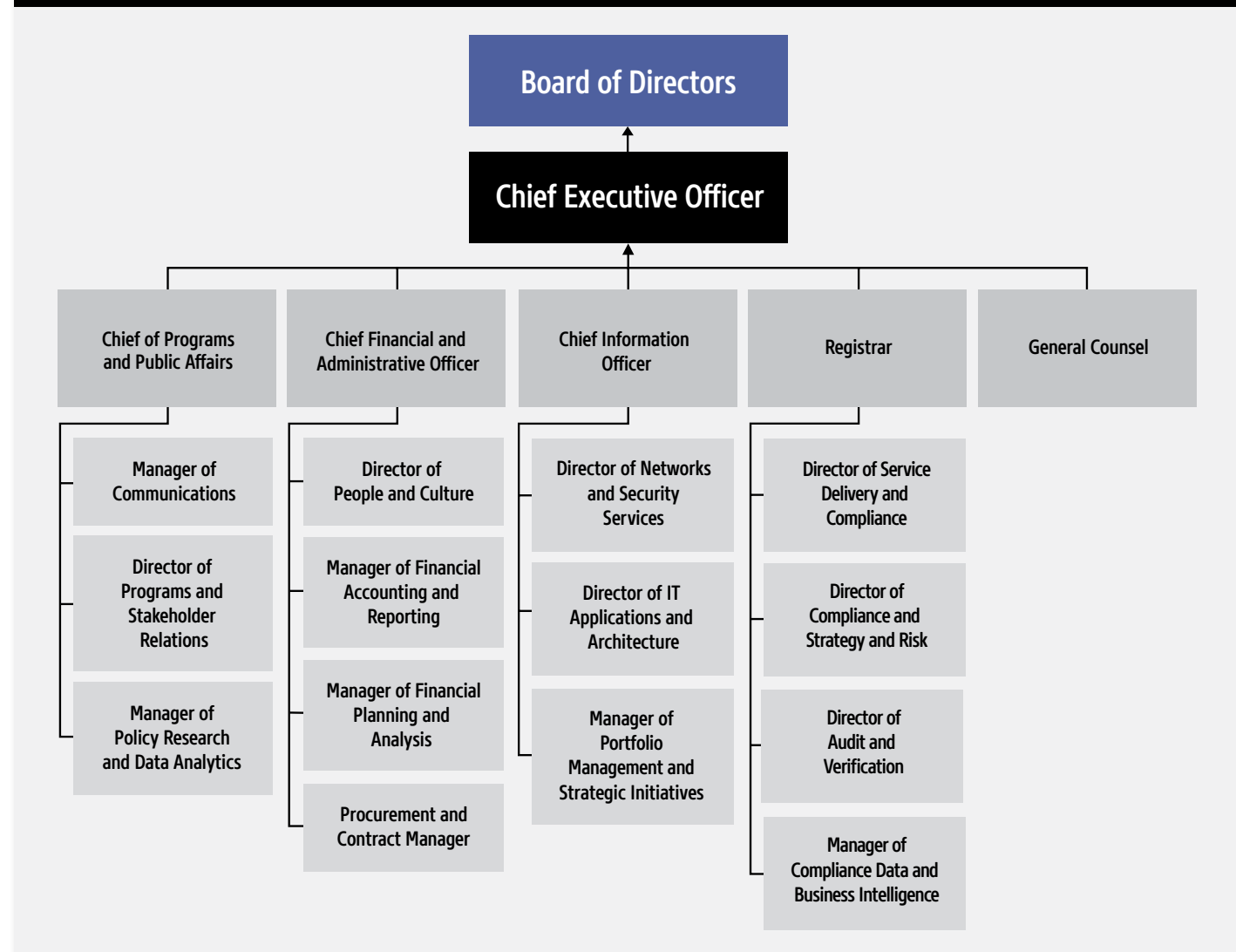


## 08 FINANCIAL PLAN

RPRAs organizational structure over the business planning period is represented in the chart shown below. The chart shows the executive team, which is made up of

the CEO, Registrar, Chief of Programs and Public Affairs, Chief Information Officer and the Chief Financial and Administration Officer, and their direct reports.

### RPRAs ORGANIZATIONAL STRUCTURE 2026-2028



### NUMBER OF FTES BY DEPARTMENT

Department	Full Time Employees
CEO and Legal	4
Programs and Public Affairs	15
Finance and Administration (HR)	13
Information Technology	14
Compliance and Enforcement	55
<b>Total 2026 FTEs</b>	<b>101</b>

## 08 FINANCIAL PLAN

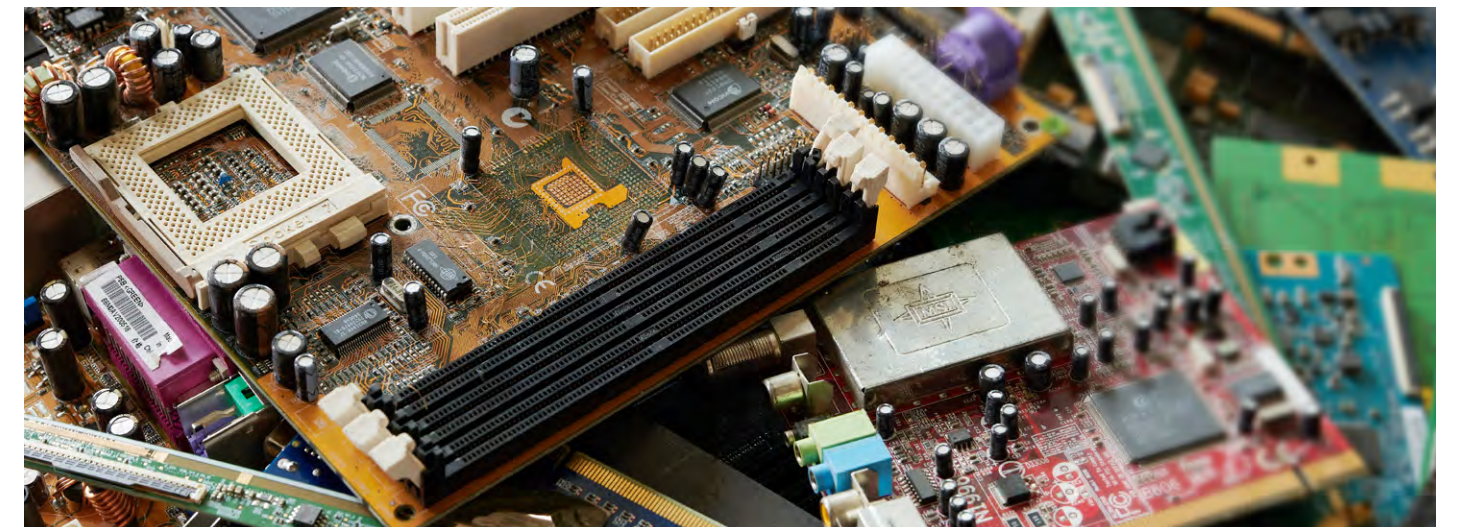
### Debt financing

RPRAs had 8 term loans and credit facilities amounting to \$23.2M as of December 31, 2024, which were acquired to finance registry development and set-up and operate the Excess Soil and HWP registries.

As of December 31, 2026, the budgeted total amount of debt financing will be approximately \$17M, which will be repaid with interest over 7 years. The following table shows details of RPRAs debt financing as of December 31, 2024, compared to the budget for December 31, 2025, and the budget for 2026.

### DEBT FINANCING: 2024 ACTUAL AND 2025 BUDGET COMPARED TO 2026 BUDGET

Program	(in millions) \$	Interest rate	Repayment period	2024 Actual	2025 Budget	2026 Budget
Tires		Term loan; 2.35% fixed until June 2026	2021 to 2031	\$ 1.5	\$ 1.2	\$ 1.0
ITT/AV, Batteries and Lighting		Term loan; 2.795% fixed until December 2026	2021 to 2031	1.0	0.8	0.7
Excess Soil		Term loan; 5.85% fixed until June 2026	2023 to 2033	0.9	0.8	0.7
HSP		Term loan; 5.85% fixed until June 2026	2023 to 2033	2.6	2.3	2.0
Blue Box		Term loan; 5.85% fixed until June 2026	2023 to 2033	1.4	1.3	1.1
Hazardous Waste		Term loan; 5.85% fixed until June 2026	2023 to 2033	8.4	7.4	6.4
Foundational and Systems		Varies: 2.35%, 2.795% & 5.85% fixed until 2026; prime less 0.75 until 2023	2021 to 2033	5.1	4.4	3.7
Excess Soil Operating		Prime less 0.75%	2023 to 2028	1.7	2.5	1.6
Hazardous Waste Operating		Prime less 0.75%	2023 to 2026	0.6	0.6	–
<b>Total</b>				<b>\$ 23.2</b>	<b>\$ 21.3</b>	<b>\$ 17.2</b>



## 08 FINANCIAL PLAN

### Net assets and operating reserve

RPRAs maintain 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.

RPRAs' operating agreement with the Minister requires RPRAs' reserve to 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 operating reserve contribution will decrease from \$1.2M to \$0.8M or 3% of expenses in 2026. The total reserve balance is expected to grow to \$12.3M by the end of 2028 and stabilize at approximately 38% of total expenses, as outlined in the table 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 RPRAs' actual and forecasted net assets and operating reserve balances from 2024 to 2028.

NET ASSETS 2024-2028						
Asset	(in millions) \$	2024 Actual	2025 Budget	2026 Budget	2027 Forecast	2028 Forecast
Operating reserve		\$ 8.71	\$ 9.91	\$ 10.71	\$ 11.51	\$ 12.31
RRCEA start-up deficit (To be recovered in future years)		(0.46)	(0.37)	(0.28)	(0.18)	(0.09)
HWP start-up deficit (To be recovered over three years)		(0.59)	(0.27)	–	–	–
<b>Total net assets</b>		<b>\$7.66</b>	<b>\$9.27</b>	<b>\$10.44</b>	<b>\$11.33</b>	<b>\$12.22</b>
<b>Net assets, as a percent of expenses</b>		35%	35%	36%	36%	38%
<b>Reserve, as a percent of expenses</b>		40%	38%	37%	37%	38%

## 08 FINANCIAL PLAN

### Risk

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

The key risks associated with the 2026-2028 business plan include:

- Uncertain assumptions about government decision making, including the unknown cost impacts of implementing recent regulatory amendments during the planning period, the potential for new materials designated under the RRCEA, and the potential for new directions to build and operate additional digital registries.
- Uncertain assumptions about the impact of tariffs on registrants' businesses, supply volume, and impact on economy such as 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 the forecasts for 2027 and 2028 are more uncertain than the 2026 budget. Specific uncertainties include:

- 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 implement any Auditor General recommendations and potential impacts of those recommendations on the planned timelines to achieve RPRAs' strategic goals.
- 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 2027 and 2028 due to the possibility of change in RPRAs' operating environment.

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



4711 Yonge Street, Suite 408  
Toronto, Ontario M2N 6K8  
Tel: 416-226-5113  
Email: [info@rpra.ca](mailto:info@rpra.ca)  
[www.rpra.ca](http://www.rpra.ca)