

November 25, 2019

Jamie Haldenby
Ministry of Environment, Conservation and Parks
Program Management Branch - Program Oversight
40 St Clair Avenue West, 4th Floor
Toronto, ON
M4V 1M2

Dear Ms. Haldenby:

Re: Environmental Registry of Ontario 019-0671: Proposed amendments to the Resource Productivity and Recovery Authority's mandate to include digital reporting services for a wider range of waste and resource recovery programs

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario and national economies forward.

OFA supports improvements to registry systems designed to simplify and expedite the filing of reporting requirements, broaden the suite of programs able to use the digital registry platform and enable government oversight of these programs during transition to the Resource Productivity and Recovery Authority.

These improvements are designed to limit duplication of effort, cut costs and streamline processes in urban centres and denser populated rural regions. However, we would like to highlight the challenges in more rural and northern regions where broadband data and internet services are limited, existing services are of mediocre standards and include dead zone areas with no reception.

The vast bulk of MECP objectives are met through the proposed amendments in urban and southern Ontario, but rural and northern regions must be allowed the use of paper filings until such time as all levels of government recognize and commit to the delivery of suitable internet and broadband services necessary for all Ontario populations. Impacted stakeholders in rural and northern regions should not be penalized and must be afforded consideration to meet requirements comparable to digital filing requirements.

The province should seize all communications and training opportunities presented throughout the transition to reduce, reuse, recover and recycle waste resources. The proposed amendments are designed to align with the public facing 'Reducing Litter and Waste in Our Communities' discussion paper. As such, we also recommend all communications surrounding

waste management transitions to include explanatory reference defining 'producer' under a producer responsibility scheme, including who must file, from whom fees are collected, identifying sectors in the expanded RPRA stakeholder registry and describing anticipated impacts and non-impacts to the general public.

Those areas where connectivity (broadband, internet, cell service) is not accessible or insufficient". may still require traditional training and communication until connectivity is sufficient to suspend training and communication through traditional methods.

Thank you for the opportunity to comment on the proposed amendments under ERO-019-0671 to the Resource Productivity and Recovery Authority's mandate and broadened program access.

Sincerely,



Keith Currie
President