



**Global Automakers**  
of Canada

**Members**

BMW • Honda • Hyundai • Jaguar Land Rover • Kia • Maserati • Mazda • Mercedes-Benz  
Mitsubishi • Nissan • Porsche • Subaru • Toyota • VinFast • Volkswagen • Volvo

**Associates**

Denso • Ferrari • Hino • Isuzu • McLaren • RUF

October 20, 2024

The Honourable Minister Andrea Khanjin  
Minister of the Environment, Conservation and Parks  
College Park, 777 Bay Street, 5th floor  
Toronto, ON M7A 2J3

Dear Minister Khanjin,

On behalf of the Global Automakers of Canada (GAC) and its members, I am writing to express our support for the proposed amendments to Ontario's producer responsibility regulations. The Global Automakers of Canada represents 16 automakers, collectively producing 55% of the vehicles made in Ontario, and we are committed to supporting the province's goals for a sustainable and efficient waste management framework.

We are encouraged by the steps the Ministry has taken to provide flexibility for producers and reduce administrative burdens through these proposed amendments, which aim to simplify compliance without compromising environmental outcomes. These changes allow our members, who are all active producers, to navigate the regulatory landscape with greater ease, thereby ensuring continued adherence to Ontario's resource recovery objectives. In particular, we are pleased to see the focus on balancing producer responsibilities with operational feasibility, especially concerning tire regulations, where GAC members are fully supportive of the amendments as they are now aligned with achievable targets.

As organizations committed to responsible environmental stewardship, our members see these amendments as a positive step forward. The proposed adjustments, such as geographic offsetting of collection sites, the introduction of flexible collection event frameworks, and the removal of unnecessary burdens like recycling efficiency rate (RER) reporting for certain materials, provide much-needed clarity and efficiency. These changes reflect an understanding of the operational realities faced by producers and will promote better compliance while maintaining consumer access to recycling services.

Moreover, we support the Ministry's continued efforts to harmonize Ontario's regulatory framework with other jurisdictions, which is crucial for reducing complexity and ensuring that producers who operate across provinces can implement cohesive compliance strategies. By creating a more streamlined and flexible regulatory environment, Ontario is ensuring that producers can focus on their core operations while continuing to meet their environmental responsibilities.

The tables below provide detailed comments on a selection of key proposed amendments.

## Collection

Amendment	Current Requirement	Proposed Change	Comments
<b>1. Geographic Offsetting</b>	Only allowed under the HSP Regulation within upper-tier municipalities.	Introduce new provisions for geographic offsetting across adjacent local municipalities for Tires, Batteries, EEE, and HSP. Up to 10% of required collection sites can be offset.	Supportive of these proposed amendments.
<b>2. Increase Collection Events</b>	Currently, up to 25% of required collection sites can be replaced with collection events for Batteries, EEE, and HSP. Tires have no allowance for collection events.	Increase the proportion of collection sites that can be replaced with collection events from 25% to 35% for EEE and HSP. For Tires, introduce a new 25% allowance for collection events.	Supportive of these proposed amendments.
<b>3. All Municipal Collection Sites</b>	Municipal collection sites must be open year-round to qualify as permanent sites under Tires, Batteries, EEE, and HSP regulations.	Allow all municipal collection sites and mobile depots (even those open part-time or seasonally) to qualify as permanent collection sites under all four regulations.	Supportive of these proposed amendments.
<b>4. Adjust Timeline for Census Data</b>	Producers must immediately adjust their collection networks based on the most recent census data.	Introduce a transition period (one or two years) to allow producers time to adjust their collection sites to align with updated population data after a new census is released.	Supportive of these proposed amendments.
<b>5. Align Population Density Provisions</b>	Tire producers must meet population-based requirements with one collection site per 3,000 people in municipalities with populations of 1,000 or more.	Reduce the number of required collection sites in municipalities with more than 500,000 people: 167 collection sites for the first 500,000 people and one site for every 6,000 people thereafter.	Supportive of these proposed amendments.
<b>6. Align “Take-Back” Provisions</b>	HSP Regulation does not include a take-back option.	Introduce a take-back option allowing producers to reduce collection site requirements based on the percentage of materials collected via take-back systems, as long as performance is equal to population-based systems.	Supportive of these proposed amendments.
<b>7. New Option for HSP Producers to Meet Collection Requirements</b>	Producers of pesticides, solvents, non-refillable pressurized containers, and automotive HSP must meet population-based collection requirements.	Allow producers to meet collection requirements by establishing sites based on the previous year’s municipal collection network or population-based formulas.	Supportive of these proposed amendments.
<b>8. Add New Performance Requirements for Large Producers of Automotive HSP</b>	Large producers can base collection networks on retail locations without specific performance benchmarks.	Large producers must demonstrate that a retail-location-based collection network performs as well as population-based systems in terms of material collection.	This requirement is difficult to quantify and is not demonstratable in a practical way. There should be flexibility for producers to use either/both compliance pathways without additional effort, to meet the regulation requirements. The amendment is a potential barrier for one compliance pathway compared to the other, while both compliance pathways are effective. Adding an extra requirement to the retail-location based collection network pathway is not a sensible or fair approach as there is no basis for the inception of this amendment.

## Tires

Amendment	Current Requirement	Proposed Change	Comments
<b>1. Adjust Performance Target</b>	Tire producers must collect a minimum weight of tires each year based on an 85% collection and management target (2019-2024).	Remove the collection target and revise the management target to: 65% for 2025-2029, and 70% from 2030 onwards.	Supportive of these changes and would like to see them take affect sooner than the proposed dates (possibly for the 2024 compliance year).
<b>2. Increase Threshold for Regulated Tires</b>	Producers must report on all tires weighing 1 kg or more.	Raise the weight threshold to 5 kg for reporting, but producers must still accept and manage tires under 5 kg if returned to collection networks.	Supportive of these proposed amendments.
<b>3. Reduce Tire Hauler Reporting</b>	Tire haulers must report annually on four tire types: large tires, medium truck tires, off-the-road tires (except large off-road), and passenger/light truck tires.	Simplify reporting to only two categories: 1) Large tires (over 700 kg) and 2) Other tires (under 700 kg).	Supportive of these proposed amendments.

## HSP

Amendment	Current Requirement	Proposed Change	Comments
<b>1. Revise Producer Hierarchy for Antifreeze and Oil Filters</b>	Producers of antifreeze and oil filters must collect and manage these products, including those supplied in new vehicles.	Shift the responsibility for antifreeze and oil filters supplied in new vehicles to vehicle brand holders, importers, and marketers (similar to the Tires Regulation).	Harmonizes approach nationally
<b>2. Revise Requirements for Refillable Pressurized Containers</b>	Producers of refillable pressurized containers have different collection and reporting obligations than producers of refillable propane containers.	Align the requirements for refillable pressurized containers with those for refillable propane containers, including collection obligations and reporting requirements.	

Our industry is committed to responsible environmental stewardship and we appreciate the opportunity to provide our perspective on this critical issue. We are eager to collaborate with the Ministry to ensure that Ontario's EPR framework remains fair, competitive and aligns with the best interests of all stakeholders.

Thank you for your attention to this critical matter.



Irfaan Hasham, P.Eng, CEM, CMVP, CBCP  
Director, Environment and Energy