



April 13, 2026

Subject: ERO 026-0218 – Support for Proposed RER Timing Amendment

To whom it may concern,

We are a producer obligated under Ontario's Hazardous and Special Products (HSP) regulation, and we support the proposed amendment to move the effective date of the Recycling Efficiency Rate (RER) requirement for oil containers and antifreeze from 2027 to 2028.

Achieving a 95% RER depends on the availability of appropriate and reliable processing infrastructure. As you may know, the system is currently undergoing a transition, including the development of new processing capacity, which requires time for site development, permitting, equipment installation and commissioning.

Advancing the RER requirement before the supporting infrastructure is fully operational creates a risk that regulatory timelines and system readiness will not align, resulting in compliance challenges for producers despite good-faith efforts.

We believe that delaying the RER effective date to 2028 is a practical adjustment that supports effective implementation and long-term system performance.

Sincerely,

A handwritten signature in black ink, appearing to read "Joan Monaghan".

Joan Monaghan
Tax manager
UAP Inc

