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May 1, 2026

Ms. Krista Friesen
Manager, Policy Development

Ontario Ministry of the Environment, Conservation and Parks
Resource Recovery Policy Branch
40 St. Clair Avenue West, 8th floor
Toronto, ON, M4V 1M2

Delivered via E-mail: krista.friesen@ontario.ca

Dear Ms. Friesen,

Re: Consultation Feedback and Recommendations – Proposed Amendments to Producer Responsibility Regulations

On behalf of Panasonic Canada Inc., a producer of batteries in Ontario, we appreciate the opportunity to comment on the proposed amendments to the producer responsibility regulations under the Resource Recovery and Circular Economy Act, 2016 (RRCEA).

We support the Ministry's objective of improving environmental outcomes and strengthening Ontario's resource recovery system. However, we believe the proposed amendments would benefit from further consultation, deeper analysis, and a broader review of the regulatory framework before implementation.

Several of the proposed amendments appear primarily aimed at addressing issues within the Tires Regulation (O. Reg. 225/18), yet would apply across multiple material streams, including batteries (O. Reg. 30/20). Applying system-wide changes to resolve issues in a single category risks unintended consequences, including higher costs, reduced flexibility, and misalignment across otherwise effective programs.

Given the above, we would like to provide the following additional feedback and recommendations:

1. The Need for Comprehensive Regulatory Review and Consultation

Ontario's individual producer responsibility model differs from extended producer responsibility (EPR) systems in other jurisdictions and has resulted in greater administrative complexity and cost. Jurisdictions such as British Columbia and Quebec have demonstrated that simpler and flexible systems can achieve strong environmental outcomes with lower administrative burden.

We recommend that the Ministry conduct a comprehensive regulatory review, supported by expanded stakeholder consultation, which focuses on harmonization, simplification, and alignment with EPR systems in other provinces. If immediate action is required for tire-related challenges, a targeted, time-limited approach focused solely on tires would be more appropriate.

2. Addressing Structural Issues in the Batteries Regulation (O. Reg. 30/20)

The proposed amendments do not address long-standing key structural issues in the Batteries Regulation, such as the Recycling Efficiency Rate (RER) methodology and misalignment between collection performance and compliance. Specifically, the current linkage between RER and management requirements creates a disconnect between actual performance outcomes and compliance.

As such, we recommend delinking the RER from management targets to improve transparency, predictability, and system performance.

3. Administrative Penalties (O. Reg. 558/22)

Removing the \$1M cap on administrative penalties is a significant change with unclear justification, given that an alternative mechanism exists for fines above \$1M (via prosecution).

We recommend retaining the penalty cap or deferring regulation changes pending further consultation. Alternatively, if the penalty cap is removed, safeguards should be introduced such as due diligence defense and remediation plan options for producers.

4. Performance Credits and Sharing of Collection Sites

Introducing prescriptive rules or a clearinghouse model may increase complexity and costs, reduce flexibility, and create market distortions.

We recommend maintaining market-based approaches or, at a minimum, conducting further consultation before introducing regulatory changes.

5. Ontario-Based Processing Requirements

This change is primarily targeted at the tires program. However, it should be noted that Battery recycling relies on specialized, often non-local infrastructure. Mandating Ontario-based processing could increase costs, reduce efficiency and limit recycling effectiveness.

We recommend that further analysis and consultation are needed before implementing such requirements.

Conclusion

Ontario has an opportunity to strengthen its framework while maintaining efficiency, affordability, and clarity. This requires a balanced approach that addresses immediate issues while enabling broader, evidence-based reform.

We appreciate the opportunity to provide input and welcome continued engagement.

Regards,


[HITOSHI NARAWA \(Apr 30, 2026 11:00:42 EDT\)](#)

Hitoshi Narawa
President

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Final Audit Report

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