

**ARBITRATION TO DETERMINE
THE 2014 STEWARD OBLIGATION FOR THE BLUE BOX PROGRAM**

BETWEEN:

**ASSOCIATION OF MUNICIPALITIES OF ONTARIO and THE CITY OF
TORONTO**

Applicants

- and -

STEWARDSHIP ONTARIO

Respondent

AFFIDAVIT OF JAY STANFORD

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Introduction

1. My name is Jay Stanford. I am currently employed by the City of London as the Director of Environment, Fleet and Solid Waste and have held this position since 2012. One of my roles in this position and all previous positions is the management of the City's Blue Box (BB) program. My CV is attached.
2. I will be a witness at this arbitration because I have been compelled to do so by summons.
3. As the manager of a BB program that receives some steward funding, I am not neutral in this arbitration.

My background and experience

4. I have worked for the City of London since 1995 in various positions, including director and senior manager of Environmental & Engineering Services Area. I hold a Masters of Public Administration from the University of Western Ontario, as well as Bachelor and Masters of Arts in Geography from McGill. I have been a member of the AMO waste management task force for the last 5 or 6 years.
5. I have been involved with BB recycling since 1987 when I joined Proctor & Redfern (consultants) and provided recycling services to municipalities, the Recycling Advisory Committee (RAC), the Waste Reduction Advisory Council (WRAC), Ontario Multi-materials Recycling Inc., etc..
6. After I joined the City of London I was involved in a number of Ontario-wide projects and committees including projects with Corporations Supporting Recycling, Stewardship Ontario, Waste Diversion Ontario and Ministry of the Environment. I was involved in major projects such as the establishment of the Efficiency & Effectiveness (E&E) Fund, Ontario Municipal Benchmarking Initiative (OMBI), the initial costing of Blue Box programs, providing comments on the Cost Containment Plan, the KPMG Best Practices study, etc.
7. Over the years I have expended hundreds of hours on these initiatives including involvement with such groups as Recycling Council of Ontario, Municipal Waste Association (MWA), Ontario Waste Management Association (OWMA) and the Association of Municipalities of Ontario (AMO).

London's Blue Box Program

8. The City of London is home to approximately 370,000 people in approximately 170,300 households. Since 1990, the City has provided a recycling program for its residents. Every household is eligible for curbside pickup and more than 90% participate due to increasing awareness of recycling generally and our publicity programs.
9. We use a two stream recycling system that accepts 22 different materials. Residents divide up fibres (paper products) and containers (including plastics, metal and glass containers) into two different boxes for pickup.
10. Our waste diversion target is set annually as part of our continuous improvement system. Our current (2013) diversion rate is 44%. This includes composting, yard waste, electronics, and recyclable materials that are diverted from the landfill. Our long term goal is to obtain the Provincial goal of 60% waste diverted.
11. Since 2008 we have contracted out the pickup and transportation of BB materials to Miller Waste Management (Miller) for 85% of all curbside households. They won this contract through a competitive process that involved 3 or 4 other entries. When the contract for the remaining 15% of the City came up for renewal several

- years ago, Miller won this competition as well, and they now collect 100% of City curbside and multi-residential households.
12. Miller transports the waste to a Material Recovery Facility (MRF) that they operate under contract with the City. The City owns the facility. The City contributed \$18 million towards the capital cost of the Material Recovery Facility using Federal Gas Tax funds. Miller won the competition for the contract to design, build and operate the MRF in 2011. The new MRF opened in the 2012. Miller also markets the recovered materials on our behalf.
 13. The Environment, Fleet and Solid Waste Service Area, a department within the City of London, is responsible for: administering the BB program, including preparing the Datacall; education and awareness, corporate reporting, including reporting to committee and council; and community reporting to the residents of London.
 14. The Service Area includes approximately 160 City employees. Of these, approximately 4 full-time equivalent staff persons are dedicated to managing aspects of the BB program. Their duties include everything except the operation of the BB program - including designing, changing and optimizing the system to save costs.
 15. I am the Director for the Service Area and I have full responsibility for the BB program – if something were to go wrong, I am the one people would call.

Datacall accuracy – Issue 2

16. Like other municipal BB programs, we report to the WDO Datacall every year the tonnage of BB materials that we diverted from landfill through our BB program, and the net costs that we incurred as a result of that program.
17. The numbers reported to the 2012 Datacall are accurate.
18. Preparing the Datacall is one of the Waste Diversion Coordinator's key responsibilities. The current Waste Diversion Coordinator is Anne Boyd. Completion of the Datacall on-line form is about a 2 to 3 day process in March for the Waste Diversion Coordinator.
19. The time required to complete the on-line form has decreased each year because of how we have adjusted our internal data management process to support the Datacall format and because the Datacall itself has become more simplified. In addition to completing the on-line form, staff resources are required to manage this data throughout the year to assist to prepare annual summary information. Finance and Human Resource staff prepare summary reports for the Waste Diversion Coordinator.
20. After the Waste Diversion Coordinator has completed the Datacall, her immediate supervisor reviews it. When they are both satisfied, I review it for anomalies or indicators of poor performance as compared to previous years. If I notice a

dramatic change, I will investigate to determine the reason. Finally, it is sent to Treasurer who signs off and sends to WDO.

21. Much of the information required by the Datacall comes directly from the data collected at the MRF weigh scales. This automated system (WasteWorks) is both efficient and accurate. It is not necessary to enter the data manually from invoices, making preparing the Datacall much faster. In the past completion of the on-line Datacall has taken up to five days. Since putting in place the new weighing system, it now takes less than half that long. The weigh scale audit protocol at the MRF, which requires annual scale certification, verifies that the information coming from the weigh scales is accurate.
22. The cost of the BB collection and transportation is set out in the contracts with Miller. We know how many households are served, and how many are added to the program each month.
23. The cost of processing the BB materials is also set out in a contract between the City and Miller. It uses a rate structure based on amount of materials coming into the MRF and the level of contamination in the material. The waste audit protocol determines the level of contamination arriving in materials versus level of contamination going out.
24. All revenues from the sale of the materials come back to the City, less a broker fee of 2.5%. Miller also receives an incentive to get the best price possible and an incentive to maximize the recovery of recyclables. If Miller exceeds the Composite Index on the ReclayStewardEdge price sheet, the amount exceeded is split equally between the City and Miller. They routinely beat the price sheet index by 10-20%. If Miller exceeds a capture rate of 98% for paper, 95% for glass containers or 94% for all other containers, they keep the revenue from the materials above the aforementioned benchmarks. Miller typically achieves a capture rate of 99% of recyclable materials. These incentives have proven to be best practices for us in achieving higher revenues.
25. The BB program work done by city staff is assigned and tracked on spreadsheets. The City's finance department also assists with the Datacall, particularly if it is selected for an audit as we were about 5 or 7 years ago.
26. I do not know why we were selected for an audit. At the end of the audit, we were told that some items that we reported were not accurate. We corrected our errors and made sure it did not happen in subsequent years. We likely had a financial reduction for the year that we were audited. We have not been audited since.
27. The error that the WDO auditors identified reflects the complexity of the Datacall system. There are changes every year and reasonable people can come to different understandings of how things should be reported.
28. We do our best to stay on top of the changing requirements. Our staff regularly (usually one course, webinars or information sessions per year) attend the courses offered by WDO on the Datacall. My experience with the Datacall has been that although it can be time consuming, it is worth the time and effort and it produces

reasonable information that has helped us to find ways to improve our BB program efficiency and effectiveness.

Efficiency, effectiveness and cost containment - Issue 1

29. In 2012, our BB program collected 27,490 tonnes. The program cost London approximately \$9.9 Million in gross costs (including \$1.2 million in amortized capital costs and calculated interest of \$0.3 million). After revenue of \$3.3 million, our net cost for 2012 was \$6.3 million. Of that, we received only about \$2.85 Million (45%) from the payout model.
30. The remainder (excluding capital and calculated interest), \$2.05 million, was paid through municipal taxes.
31. It is important to us to contain costs because the City of London is not a municipality with a lot of cash. For example, we have had the second highest unemployment rate in Ontario for a couple years. I am paid to find savings in the BB program and other programs. We must use the industry best practices because this is the only way that we can keep the program going – we cannot rely on getting a budget increase if the cost of the program goes up.
32. I cannot think of anything that the City has not tried at the right point in time, such as when a contract is up for renewal, to reduce costs and attain efficiency.
33. Attached to this affidavit is a report that provides a detailed review of the efforts we have gone to, titled *City of London, Ontario, Canada: Continuous Improvement - The Story of Recycling and the Ongoing Focus on Program Optimization*.
34. Key milestone dates that highlight the implementation of cost savings initiatives directly or indirectly for the City's recycling program are listed in this report. Since 1990, when the Blue Box Program was implemented, at least 25 projects, studies, investigations, new initiatives, etc. have been undertaken in London to help reduce recycling programs costs, meet Council objectives and meet the needs of the community.

Best practices

35. We work to operate at best practices whenever possible in all our services within Environment, Fleet & Solid Waste. This includes our BB program. As far as BB goes, the City of London has always been committed to Best Practices. It is fundamental to our continuous improvement system for waste management.
36. London does not have a single definition of a Best Practice that it uses. London strives to find proven (verifiable) practices but there really are not that many. Even if verified, caution is still required.

37. London staff have highlighted on many occasions that there is a big difference between a Benchmark (data at a point in time) and a Best Practice (more of a process used to verify that a practice is in fact a 'best practice' and not just an anomaly).
38. WDO Best Practices are identified in the Datacall. In addition, we participate in provincial forums and organizations (AMO, OWMA, RCO, CCC, MWA) for on-going discussion on Best Practices. Within our municipality we continually survey other municipalities to learn about their best practices and conduct internal reviews to determine which Best Practices we are able to pilot and, or implement. With the assistance of BP funding (through CIF) we have implemented some Best Practices.
39. London staff are conditioned to look for key characteristics when reviewing potential 'best practices' in place in other cities. Some of the definitions we are comfortable with include:
- a. The practice may be in place in one or more Ontario municipalities, in a form similar to that in the municipality or municipalities identified. However, the practice may not yet be universally implemented in all Ontario municipalities where its application could potentially improve measured performance in the service or activity. It is not a 'proven' best practice but it worth exploring further for applicability in London.
 - b. A practice which has verifiably contributed to service performance improvement in the case-study municipality may not be applicable or equally cost-beneficial in all other Ontario municipalities. Even within Ontario, municipalities exhibit considerable variation in service-significant factors such as population size and density, climate and terrain, non-resident usage of services and infrastructure, industrial base, or age of settlement.
 - c. Best Practice Summary Reports are intended to be an efficient reference tool for municipal service providers to learn about and investigate alternative approaches to delivering efficient and effective services. Neither the Ontario Centre for Municipal Best Practices nor any Summary Report in any way establishes minimum performance standards for municipal services or prescribes service delivery approaches.
40. City of London staff in waste management do not find value in the definition used in the 2007 KPMG Report for "best practice" as it lacks the rigour to determine if something is truly a best practice or not. That KPMG definition is as follows "waste system practices that affect Blue Box recycling programs and that result in the attainment of provincial and municipal Blue Box material diversion goals in the most cost-effective way possible." — http://www.stewardshipontario.ca/wp-content/uploads/2013/03/KPMG_final_report_vol1.pdf page 2

41. Best practices change with time and in keeping with other changes that impact our industry, such as technology, customer habits and changes in material composition.
42. Many best practices do not reduce costs. Some increase costs in the short term but reduce costs in the long run. For example, building a regional MRF in London resulted in increased costs in the short term due to increased capital costs, but has reduced overall long term processing costs.
43. Some best practices increase our costs in the short and long term. For example, providing new Blue Boxes to capture more materials or adding new materials to the Blue Box program increase costs as there are more materials to collect and process. Many of the newer materials being added to the BB have the highest costs to capture (e.g. lightweight plastics, polycoat containers).

Complying with the CCP

44. London has done everything practical in order that we can to comply with the Cost Containment Plan. The Cost Containment Plan (2005) contained four actions for municipalities. These actions are listed below.

Action	What has London done?
Adopting user pay waste management charges and limiting the quantities of wastes that will be collected and/or making participation in Blue Box recycling programs mandatory	<ul style="list-style-type: none"> • Introduced waste container limits at curb • Introduced user pay at depots • This action <u>increases</u> costs because it generates more recyclables
Co-operating with other municipalities and private sector operators to integrate recycling program services to improve economies of scale and cost effectiveness	<ul style="list-style-type: none"> • Built regional MRF; now processes material from seven other municipalities (which have the same program) • Generates savings/cost avoidance of about \$1 million /year
Providing economic incentives in support of increased recycling including green procurement policies and through economic development programs	<ul style="list-style-type: none"> • Examples include buying BB made of 60% post-consumer plastics
Adopting best practices identified by WDO through analysis of Municipal Datacall data and other research	<ul style="list-style-type: none"> • City works to maximize BB score on Datacall; see answers to Datacall questions

45. With few exceptions it is difficult to determine what savings (or increase in costs) complying with Cost Containment Plan has meant for London. For example, in

2011 we provided a new (second) Blue Box to all households with the help of CIF funding. This BP helped us to recover more of the newly added lightweight materials (plastics, polycoat containers), however our costs were not reduced by this BP. On the other hand, we estimate that establishment of a regional MRF has resulted in savings of about \$1 million per year for London and partner municipalities.

Why have costs gone up

46. Despite strenuous efforts at cost containment, our net BB program costs have gone up since 2005. The major causes of the increase in cost since then are:

a. Recycling Additional Materials

- i. Since 2005 we have added a number of materials (e.g., cardboard cans; #3, #6, and #7 plastics, thermoform plastics; aerosol cans). All these materials are light weight containers which are expensive to collect and process. The cost to collect and process light weight containers is several times more expensive than paper products. On average the cost to process containers is about 4 to 5 times the cost to process paper products.

b. Changing Material Composition

- i. The composition of recycling materials is changing. Material is migrating from easy to more difficult materials to recycle (e.g., soup moving to polycoat from steel cans); packaging is being light weighted (e.g., less plastic in PET beverage containers), more OCC and less ONP and new being added to the program. This has resulted in a 70% increase in the volume of recyclables compared to a 20% increase in weight over the same period. This jump in volume directly affects the cost to manage recyclables.
47. The increase in London's cost is not due wastefulness or inefficiency. The MRF was designed and built by the private sector. London uses the private sector to collect and process its materials. The contractors were selected using an open competitive process. The City has opened a regional MRF that now serves seven other municipalities to provide economies of scale. The City has not included the most difficult/expensive materials to manage (film plastic, expanded foam polystyrene) in its program.

E&E Fund

48. E&E Fund: what was your role? I sat on a working group that examined ideas for a funding pot that would incent municipalities to improve their recycling programs. This fit in very nicely with London's Continuous Improvement System and our fundamental goal of striving to do better.

49. The E&E Fund provided funding to municipality to complete research (pilots studies) to learn how they could improve (i.e. lower) their E&E Factor (E&E factor = net cost per tonne divided by recovery rate). Funding was a portion (approx. 10%) of the stewardship funding obligation. The objective was to decrease programs costs while increasing recovery, and E&E grants were provided to support this objective. The E&E funds were successful as they evolved into the CIF program, which provided funding to implement program changes (that had been studied and piloted under E&E).
50. London completed several E&E projects. By the very length of the E&E program and its successor (CIF) over many years we presume there has been a high interest and uptake of grants.
51. Did municipalities do other things to help each other improve? Yes, we have collaborated with other municipalities, Stewardship Ontario and CIF on many of the E&E/CIF projects. It would be useful if SO posted the E&E reports on their website (these were removed with the new website).

Cost Containment Plan (CCP)

52. Why did municipalities support and pay for the CCP? The only explanation I can offer is that most municipal staff, like those in London, strive to deliver better services to our taxpayers for a reasonable investment. When a municipality is offered tools and techniques to help 'contain' cost we will gladly accept them. This helps us do our job, helps with our annual performance reviews, helps with public reporting through Committee and Council, and in conversations with the media.
53. We also believed that a process like this would highlight the impacts that steward materials were having on the Blue Box program and make them more aware of the consequences of their actions.
54. The City of London, under my signature, submitted comments on the proposed CCP (summarized at p 66 of CCP). Extracts from these comments are below:

"1. Are the cost containment principles, policies and practices outlined in Section 2.2 and 2.3 appropriate?"

- Yes, overall these are appropriate. The position paper refers to the 'natural tension that exists between increasing recovery, increasing revenues and reducing costs'. In practice this tension depends upon the material. In fact for some materials the opposite is true - by increasing recovery and revenues, net costs will be reduced.
- Cost containment practices must recognize this important fact and recognize that municipalities must have the authority to determine the

most cost effective basket of goods that will be targeted for their blue box program.

- We would suggest that the emphasis should be to discourage stewards from choosing packaging materials with low revenues (insufficient market capacity and quality problem) rather than supporting continued use of low revenue materials.

2. What policies and practices would ensure compliance by municipalities and stewards with the principles of cost containment?

- We do not support penalties on municipalities and stewards, at least within the early years of the BBPP.
- Noting that municipalities have long worked under principles of cost containment it is important that they maintain the autonomy to set specific material targets, while working towards the overall provincial targets.

3. Are there cost containment elements, not identified in Section 2.3, that would support municipal recycling program efficiency or the distribution of stewards' funding in ways that support cost effective recycling?

- Diversion Targets: that material specific targets be designed to promote recovery of the next least costly unit of waste.
- In general this paper identifies a comprehensive and ambitious menu of features designed to contain BBPP costs. This huge wish list ranges from green procurement protocols, to analysis of systems designed to allow commingled collection and single stream processing. What is missing from the discussion is who pays and who is responsible for the development and implementation of these cost containment strategies.

4. How should increasing material recovery be balanced with improving cost effectiveness when selecting policies and practices for cost containment or when reviewing applications to the E&E fund?

- When selecting policies and practices for cost containment, recovery and cost effectiveness need be considered/balanced with respect to other environmental impacts.
- More allowance could be granted with respect to the E&E fund since in some respects this is for exploratory research, thus proving cost effectiveness should not determine eligibility for an E&E funding.

6. Will the cost containment and E&E program elements outlined provide sufficient predictability of future BBPP costs to meet the financial planning needs of stewards and municipalities?

- Not completely, because global factors that impact commodity markets and product packaging would not be predicted by the model.”

55. Did municipalities understand the CCP to be a change in your right to 50% of actual BB costs? No. Why would municipalities wish to accept less funding when the law states 50% of net costs. We accepted the E&E Fund and Continuous Improvement Fund as taking a portion of municipal funding for the right reason (e.g., increase efficiency). I have not seen a signed document that states we agree to receive less money on a permanent basis. I do know that negotiations take place each year; however municipalities have finally said enough is enough.
56. Is cost containment the same as payment containment? No, these are fundamentally different. Cost containment is purely a method to control costs. Initiatives are put in place to ‘contain’ costs from going up. It does not mean that cost will not go up. Also, cost containment is different from ‘cost reduction.’
57. Payment containment suggests payments are going to be withheld. Payment is a fee paid for services delivered. The law states this amount to be 50%.
58. Please keep in mind that so much of this work is GTA centric. . . basically people from outside the GTA are less involved due to distance. 5 to 10 years ago we did not of the teleconference capabilities that we have now, etc. I always found from London’s perspective were only able to keep up with 1/3 to one half of what was going on.
59. In summary. . . London was likely better informed than other municipalities, . . . but can you imagine the municipalities outside GTA that did not have time to keep up with the issues!!! They would have little understanding or recourse!!

KPMG Report

60. I was part of a municipal working group that reviewed a few documents, provided comments and attended one or two consultant presentations when the KPMG report was being prepared.
61. The KPMG report and its “best practice” conclusions were not helpful to London. We were disappointed because City of London details were more or less just handed back to us. I personally described it as a Lunch pail let down. For the amount of time we spent on this project, we learned very little that we did not already know and could apply in London.
62. The KPMG report showed some room for improvement (there is always room for improvement) but generally that municipal BB programs were operating well, somewhat undercapitalized but quite efficient.

WDO / KPMG best practices score

63. Because of the way the pay-out model is calculated, maximizing our WDO "best practice" score is important to ensure we receive the maximum amount of funding. Our WDO Best practice score was 90% in 2012.
64. We are not satisfied that good evidence supports the entire list of WDO "best practices". We need to see evidence to support the cost effectiveness of new measures before we adopt them, and would not impose unnecessary costs on our city.
65. Since the WDO Best Practice (BP) questions have been introduced we have managed our programs to follow the WDO BP guidelines wherever possible and as they align with our other priorities. We have introduced a number of program initiatives and changes in order to comply with the WDO BP.
66. CIF funding has provided financial incentives to implement a variety of best practices, not limited to the WDO BP list, and we have taken advantage of this on many occasions.
67. We are in Cost Band #1 - Large Urban. In 2012, the group also included the cities of Hamilton (over 200,000 households) and Toronto (almost 1,000,000 households) as well as the regional municipalities of Halton (approximately 180,000 households), York (approximately 325,000 households) and Peel (approximately 410,000 households).
68. London usually performs reasonably well in the "Large Urban" group for quantity recycled and costs. It is important to note that communities in the Greater Toronto Area will have a different quantity of newspaper to recycle due to the number of daily and weekly newspapers available. This is not the same in London and likely impacts our WDO Best Practice score.
69. There are many special situations and exceptions. The WDO BP score does not reflect efficiency in all instances (or for all municipalities.) This has been pointed out to WDO.
70. Better comparators for London would be these municipalities: Essex-Windsor Solid Waste Authority, Waterloo Region, Niagara Region, Ottawa, Barrie, Guelph, Brantford, Oxford County and Kingston. When London conducts its own surveys and requests for information these locations are often contacted because of their close proximity to London.
71. Are best practice scores calculated by WDO the same as BB best practices as you understand them? No. We have seen little evidence that in fact the WDO BP are verifiable BP.
72. Does this scoring exercise incent London to operate better? More efficiently? More effectively? The scoring exercise does not incent London to operate better. Staff are always trying to improve London's Blue Box program to lower costs for its residents (who pay more than 50% of the costs) and divert more materials.

Funding from CIF does allow us to implement some BP quicker due to the financial support.

73. Does payment containment by stewards, i.e. less money to municipal BB programs, incent London to operate better? More efficiently? More effectively?

- a. Payment containment does not incent London to operate better. If we had more funds, the number one thing we would do is invest in more education and awareness, and providing more feedback to London residents about recycling performance. At the moment, we do not have the time and resources to reach everyone. We would like to create targeted marketing and promotional strategies.
- b. If we were able to better educate people about the BB program, we could get a better separation of materials at the house, increase the capture of some materials, and reduce the contamination of the BB materials with garbage or non-recyclable materials. This would allow us to further optimize the existing system – increasing revenue and decreasing the cost.

In Kind (newspaper ads)

74. The City of London does not have a dedicated in-kind advertising coordinator. The Waste Diversion Coordinator works with the Communications department to prepare and place the in-kind ads. As discussed above, she has many other responsibilities.

75. Generally, we receive a preferred rate for newspaper advertisements that is about half the CARD (standard) rate that the newspapers offer via the in-kind system.

76. We have always managed to use all of our in-kind advertising space, although this can be a struggle because we receive far too much. We would certainly not buy this many ads if we had to pay for them.

77. We tried to use our in-kind lineage to place online ads, but we were denied by WDO. We are pleased to see that for 2014, on-line ads have been allowed, as we like to try new advertising models.

78. Also, the lineage is not in the newspapers that we would prefer to use. Most of the lineage we receive through the in-kind system is the London Free Press. We would prefer to place adds in two local community papers because they have greater market penetration due to their broader distribution.

79. We have run into some difficulties placing the ads through the in-kind system, although this has improved in the last couple of years. For example, approximately 5 to 7 years ago we attempted to run an add for the London Cares Blue Box Food Drive, in which residents are encouraged to place Food Bank donations beside their BB. We then collect the food using the BB trucks. This ad was rejected as being unrelated to the BB program.

80. We have also been frustrated by the time it takes to place an ad through the in-kind system. Working through WDO it used to take 3-4 weeks, although this has improved to about 2-3 weeks. If we were to simply place an ad in the newspaper, it could be in that paper in 48 hours. We have also found that the newspapers do not always understand the in-kind system, and it can take a lot of time to explain it and get the ads in. We are pleased to see that this requirement has changed for 2014 and municipalities will be able to work directly with the newspapers. We pushed for this because we did not like the ineffective system we were handed.

Conclusion

81. I understand that this affidavit is sworn evidence to be offered to a legal tribunal deciding a question of great public importance. I have done my best to make this evidence as accurate and as truthful as I can. I intend to be bound by it.
82. To the best of my knowledge, I do not have any current records of any critical emails that document an agreement that is material to the issues set out in the pleadings.

WITNESS

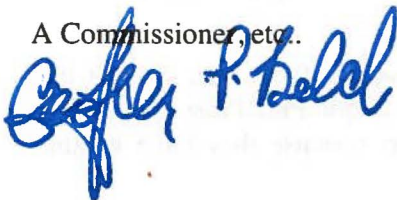
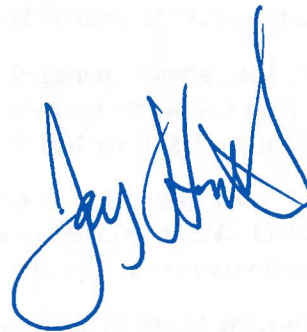
Sworn or Affirmed before me

On April 1, 2014

at the City of London

in the Province of Ontario

A Commissioner, etc.

A handwritten signature in blue ink, appearing to read "C. F. Beld", written over the text "A Commissioner, etc.".A handwritten signature in blue ink, appearing to read "Jay Hunt", written next to the word "WITNESS".