



Household Packaging and Paper Stewardship Program Plan

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Household Packaging and Paper Stewardship Program Plan

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1. Introduction

1.1 Regulatory Context

The Province of Saskatchewan approved The Environmental Management and Protection Act in 2010. Section 46 of the Act provides authority to make regulations requiring the creation and operation of a product management program.

In 2013, the Saskatchewan government approved The Household Packaging and Paper Stewardship Program Regulations and in response Multi-Material Stewardship Western (MMSW) launched its program in Saskatchewan on January 1, 2016. Since that time, businesses selling or distributing packaging and paper products have shared the responsibility with municipalities to finance the collection and recycling of household packaging and paper products (PPP).

The Province of Saskatchewan recently conducted a review and engagement process of these regulations. As a result of this process, The Household Packaging and Paper Stewardship Program Regulations, 2023 (the Regulation) came into effect on March 31, 2023.

These regulatory changes will result in a shift to a program fully funded and operated by producers of household packaging and paper products. The Regulation requires producers to operate a product stewardship program approved by the Minister of Environment or enter into an agreement with a producer responsibility organization to operate a product stewardship program approved by the Minister.

This Household Packaging and Paper Stewardship Program Plan (Program Plan) has been designed to discharge the associated regulatory obligations of MMSW's producer members. It describes a number of transition phases that will be implemented by MMSW as the program transitions from a shared responsibility model to a PPP system managed and operated by MMSW on behalf of its producer members.

2. Producer Responsibility Organization

2.1 Administration of the Program Plan

2.1.1 Multi-Material Stewardship Western

Multi-Material Stewardship Western Inc. (MMSW) is a not-for-profit producer responsibility organization (PRO) established under the Saskatchewan Non-Profit Corporations Act. MMSW's Certificate of Incorporation and by-laws can be found on MMSW's [website](#).

MMSW is responsible for administering this Program Plan on behalf of the producers which have chosen to be members of the MMSW program. MMSW's objective is to manage the Program Plan effectively and efficiently through a combination of in-house resources and outsourcing of key specialized functions or services. MMSW includes both Saskatchewan and Western Canada based staff members that manage program operations, including the supply chain and promotional activities to engage residents.

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Circular Materials, a national not-for-profit organization provides administrative support services to MMSW.

With the goal of harmonization where possible, MMSW regularly collaborates with producer organizations for other categories of materials captured by EPR regulations in Saskatchewan. As other Canadian provinces begin implementing full EPR programs for PPP, MMSW will work closely with provincial counterparts to collaborate on best practices, build efficiencies across programs, and improve collective performance.

2.1.2 Board of Directors

MMSW is governed by a Board of Directors charged with the responsibility of acting as fiduciaries for the organization. The current composition of the Board of Directors and the Committees of the Board can be found on MMSW's [website](#).

2.1.3 Advisory Committee

MMSW operates an Advisory Committee to serve as a forum through which relevant parties are kept informed of MMSW's activities and through which they can provide advice and feedback on core program initiatives, including collection cost studies. Each member of the Advisory Committee volunteers their services to represent their specific constituency and bring issues from their group to Advisory Committee meetings.

The committee currently includes members reflecting the interests of urban and rural municipalities, Regional Waste Authorities and producer members. MMSW worked collaboratively with local government associations to select members with qualifications and expertise for the Advisory Committee:

- Up to two qualified representatives are nominated by Saskatchewan Urban Municipalities Association (SUMA);
- Up to two qualified representatives are nominated by Saskatchewan Association of Rural Municipalities (SARM);
- Up to two qualified representatives are nominated by Association of Regional Waste Management Authorities of Saskatchewan (ARWMAS); and
- One qualified representative is nominated by the Saskatchewan Waste Reduction Council.

In conjunction with the engagement approach for First Nation and Métis communities and organizations outlined in Section 4.4.1, MMSW will offer space for and encourage First Nation and/or Métis representation on the Advisory Committee.

The Board of Directors appoints these nominees as well as up to three producer member representatives. The Advisory Committee's membership can be found on MMSW's [website](#). The Advisory Committee meets up to four times per year.

MMSW will regularly review the composition and mandate of the Advisory Committee in line with best practices. Organizations acting as a service provider to MMSW which have executed a services

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agreement to provide collection or post-collection services under an implementation phase outlined in this Program Plan will not be eligible to participate on the Advisory Committee. Ministry of the Environment representatives may attend Advisory Committee meetings as observers.

2.2 Producer Members

2.2.1 Producer Definition

The Regulation provides the following definition of producer:

(1) Subject to subsections (2) and (3), the person that is the producer of household packaging and paper products that are supplied in Saskatchewan to an end user is:

(a) if the person is a resident of Canada, the brand owner with respect to the household packaging and paper products;

(b) if there is no person as described in clause (a), the person that first imports the household packaging and paper products into Saskatchewan; or

(c) if there is no person as described in clause (a) or (b), the retailer who supplied the household packaging and paper products to the end user for use in Saskatchewan.

(2) In the case of a business operated wholly or in part as a franchise, the producer is the franchisor, if that franchisor has franchisees that are resident in Saskatchewan.

(3) If the producer determined in accordance with subsection (1) is a retailer and that retailer is a marketplace seller, the marketplace facilitator that contracts with the marketplace seller shall be deemed to be the producer for the purposes of this section.

The Regulation provides an exemption for businesses or organizations who generate less than \$1 million in gross annual revenue, or supply or distribute less than one tonne of packaging and paper products to Saskatchewan households or are a charitable organization.

For purposes of this Program Plan, the producer for a specific unit of household packaging or paper product will be considered in accordance with the hierarchy outlined above and the applicable definitions in the Regulation. MMSW will update existing supplementary guidance, including its policies, to align with the definition of producer in the Regulation.

2.2.2 Membership in MMSW

MMSW acts on behalf of its member businesses who are producers of PPP and who have signed a Membership Agreement with MMSW.

As a condition of membership in MMSW, prospective members must sign the Membership Agreement and fulfill its contractual obligations. In particular, the Membership Agreement specifies, among other things, the member's obligations to report and pay fees to MMSW. The terms of the Membership Agreement will align with the applicable provisions in the Regulation.

Producer companies that have joined MMSW fall into the following sector categories:

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- Food and consumer products;
- Retailers (grocers, mass/general merchandisers, hardware/housewares, drug stores and specialty merchandisers);
- Electronic manufacturers/brand owners;
- Horticulture and agriculture;
- Media and printed paper;
- Quick service/take-out restaurants;
- Paint and chemical products; and
- Other/miscellaneous.

A complete membership list is updated annually and posted on MMSW's [website](#).

MMSW regularly communicates with producer members to ensure they have updated timelines and accurate information on the program via:

- Quarterly newsletters;
- Annual producer meeting in the Fall;
- Annual reporting webinars in the Spring;
- Reporting and payment reminders;
- Ad-hoc updates and communications as required; and
- The use of a dedicated team that supports producers, available over email, phone and chat.

Member communication will be evaluated by the number of producers in compliance, the number of producers reporting on-time, and aggregated producer participation in the reporting webinar, the annual producer meeting, and newsletters (via open rate).

2.3 Program Financing

MMSW is responsible to the producers that have chosen to be its members to deliver an efficient and effective program. Producer members are responsible for paying fees that are sufficient, in aggregate, to deliver the requirements and commitments of the Program Plan. Costs fall into the following categories:

- Payments to Non-Transitioned Collectors – for collectors currently delivering recycling services under the shared responsibility model, MMSW will continue its payments to eligible local governments to offset up to 75 per cent of the net program costs for the efficient and effective collection and recycling of PPP until such time as their transition to a fully managed, fully funded EPR model is complete, if applicable;
- Material Management for Transitioned Communities – upon transition, MMSW will assume the costs to collect, transport, process and market materials included in the transition phases outlined in this Program Plan;
- Program Management – costs to administer the program;
- Resident Awareness – costs to promote program awareness and the behaviours that drive efficient and effective collection; and
- System Improvements – cost to deliver system improvements through research, market development, investments, or other initiatives.

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Producers that supply obligated PPP pay fees that are intended to cover:

- A contribution towards the cost of managing the collection, consolidation, transportation, processing and marketing of the recyclable PPP that is the basis for the program's performance;
- Where required, a contribution to advance the material's adoption in the recycling system, improve the cost efficiency to manage the material and/or to develop end markets for the material;
- An equitable share of resident awareness costs; and
- An equitable share of MMSW program management costs.

MMSW is committed to financial prudence and to establishing and maintaining a reasonable financial reserve to ensure the continued stability of the program.

Costs incurred by MMSW to deliver and administer the Program Plan are allocated amongst producers based on the following principles:

- All obligated materials should bear a fair share of the costs to manage the PPP program, irrespective of whether a material is collected, because all obligated producers who put obligated materials into the marketplace should contribute to the recycling system.
- The material management costs allocated to each material should reflect the material's impacts on the costs to collect and manage it in the recycling system because a material's unique characteristics can drive costs in distinctive ways.
- The commodity revenue should be attributed only to the materials that earn revenue because materials that are marketed have value and should benefit from earned revenue.

To allocate the program costs in accordance with the principles above, MMSW conducted (or shall conduct) several studies which serve as inputs to fee setting, including waste composition and cost impact studies. The fee setting methodology then uses the inputs from these studies to calculate the portion of the program's budget attributed to each category of material supplied by producers.

MMSW joins other PPP programs in Canada to standardize the methodologies informing producer fees. The purpose of this collaboration is to recognize a significant portion of MMSW fees are paid by producers who contribute to multiple programs across Canada. By engaging with both local and national producers during the development of these important methodologies, producers' concerns and input have been considered. Information about past consultations with producer members on the fee methodology can be found [here](#).

As recycling systems change to accommodate new packaging formats entering the marketplace (i.e., the "evolving tonne"), methodologies must be flexible enough to account for those changes and calibrate their cost effects. All methodologies undergo periodic review to verify their suitability and are updated in consultation with the producer community where required.

The fee setting methodology plays a critical role in ensuring MMSW has the tools necessary to raise funds in material categories where the material is difficult, if not impossible, to collect and recycle using today's recycling practices and technologies. A key component of the fee setting methodology is its mechanism for adding cost to unmarketable and/or underperforming material categories to enable the investment in performance improvement. These investments can be directed to research and

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development, end market development and/or promotion and education – all are necessary strategies to ensure materials advance upwards along the waste management hierarchy, which outlines the preferred approaches to waste reduction and management. For more information on the waste management hierarchy, refer to Section 5.1.

Producer members of MMSW pay fees to MMSW based on the total weight of PPP supplied to Saskatchewan residents. Eligible low-volume businesses can choose to file a simplified report and pay a flat fee based on the quantities of PPP supplied annually.

Each year, MMSW staff develop the program's annual budget for the following calendar year, which is reviewed and approved by its Finance and Audit Committee (a Committee of the Board) and the Board of the Directors. Producer members are invited to participate in an Annual Producer Meeting to review the program's results from the previous year, any changes to the program's fee methodology, and the budgets and fee rates for the coming calendar year.

3. Household Packaging and Paper Products

3.1 Regulatory Definition

The Regulation defines Household Packaging and Paper Products as:

- (a) packaging composed of any material that is used for the containment, protection, handling, delivery or presentation of a product that is provided to an end user;*
- (b) packaging-like products that are:
 - (i) purchased by or supplied to end users expressly for the purpose of containing, protecting or transporting commodities or products; and*
 - (ii) ordinarily disposed of after a single use or short-term use;**
- (c) paper of any description.*

In addition, the Regulation outlines the following exclusions:

- For the purposes of the definition of "household packaging and paper products", the following products are not household packaging and paper products:*
- (a) containers prescribed in The Environmental Management and Protection (General) Regulations for the purposes of clause 39(a) of the Act;*
 - (b) containers that are part of an operating reuse system;*
 - (c) containers from products prescribed in The Waste Paint Management Regulations, The Used Petroleum and Antifreeze Products Stewardship Regulations, or The Household Hazardous Waste Products Stewardship Regulations for the purposes of section 46 of the Act;*
 - (d) health, hygiene or safety products that, by virtue of their anticipated use, could become unsafe or unsanitary to reuse or recycle;*
 - (e) bound reference books, literary books and textbooks.*

Sections 3.2 to 3.5 below provide supplemental definitions for clarity.

3.2 Packaging

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Packaging for purposes of producer obligation and reporting under the Program Plan includes:

- Primary packaging, i.e., packaging that contains the product at the point of sale to the residential consumer;
- Grouped packaging or secondary packaging that goes to the household;¹
- Transportation, distribution or tertiary packaging that goes to the household;²
- Service packaging is packaging which may or may not bear a brand that is supplied at the point of sale by retail, food-service or other service providers to facilitate the delivery of goods. Service packaging includes all bags, boxes, and other items for the containment of goods at point of sale; and
- Packaging components and ancillary elements integrated into packaging, including ancillary elements directly hung or attached to a product and that perform a packaging function unless they are an integral part of the product and all elements are intended to be consumed or disposed of together.³

Examples of packaging material include, but are not limited to:

- Glass;
- Metal;
- Paper;
- Boxboard;
- Cardboard;
- Plastic;
- Bio-based plastic; and
- Any combination of these materials.

For the purposes of the Program Plan, paper packaging includes all paper materials regardless of the cellulosic fibre source of the material including but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources.

For clarity, the following are not considered packaging for the purposes of the Program Plan:

- Beverage containers governed by The Litter Control Designation Regulations, 1998;
- Empty oil containers, empty antifreeze containers and empty diesel exhaust fluid containers as governed by The Used Petroleum and Antifreeze Products Collection Regulations (2013);
- Transportation and distribution packaging not intended primarily for use or management in the home, for example, plastic pallet wrap;
- Industrial or bulk packaging not intended for sale to or use by residents in the home;

¹ Multiple packages of product sold in a unit, often wrapped in film plastic.

² May be both the primary packaging for the product and the package used to ship the product but is referred to as transportation packaging that goes home with the consumer. For example, household products packaged in corrugated boxes intended for final use or management by the consumer or end user.

³ Examples of this kind of packaging include, but are not limited to: labels and lids hung directly on or attached to the packaging; mascara brush which forms part of the container lid; staples, pins, clips; toy on the top of a candy product which forms part of the lid; devices for measuring dosage that form part of the detergent container lid; plastic make-up case; brush contained in the lid of corrective liquid paper; zipper on a plastic film bag containing a product.

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- Other items that are not generally considered to be packaging such as accessories to the product that do not serve a packaging function (e.g., plastic cutlery, straws, paper serviettes) and packaging components sold as product (empty) to the end consumer (e.g., garbage bags, organic waste bags); items that constitute an integral part of the product (e.g., toner cartridges, single use cameras);
- Durable packaging, which is packaging with a useful life of at least five years and is intended to facilitate storage or transport or to prevent the loss of product components for durable products and that remains with the product throughout its useful life, e.g., CD/DVD cases, packaging used to store pieces of a board game;
- Any packaging types under pressure containing the hazardous or explosives symbol; and
- Wood, ceramic, crystal, rubber and leather packaging.

3.3 Packaging-Like Products

Packaging-like products are ordinarily disposed of after a single use or short-term use and refers to products that are used and re-used for a short period of time, typically less than five years, before being disposed of or reaching the end of their useful lifespan.

Examples of packaging-like products include, but are not limited to:

- Paper gift bags and boxes;
- Paper lunch bags;
- Cardboard moving and filing boxes;
- Plastic food storage containers;
- Aluminum foil wrap; and
- Metal storage tins (thin gauge).

3.4 Paper Products

Paper products are defined as paper of any description, including:

- Flyers;
- Brochures;
- Booklets;
- Catalogues;
- Telephone directories;
- Newspapers;
- Magazines; and
- Paper used for copying, writing or any other general use.

This definition of paper does not include paper products which, by virtue of their anticipated use, could become unsafe or unsanitary to recycle, or any type of bound book not mentioned above.

For the purposes of the Program Plan, paper products comprise any type of cellulosic fibre source including, but not limited to wood, wheat, rice, cotton, bananas, eucalyptus, bamboo, hemp, and sugar cane (bagasse) fibre sources.

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3.5 Sources of Household Packaging and Paper Products

The Regulation defines a product stewardship program as:

a program for the collection and recycling of residentially generated household packaging and paper products.

The regulation defines a residence as:

*(a) a single-unit residential dwelling, including a seasonal residential dwelling; and
(b) a building that contains more than one dwelling unit, including an apartment building and a condominium, but not including a building used for temporary accommodation such as a hotel.*

For clarity, the Program Plan is not intended to apply to PPP supplied to or generated by industrial, commercial or institutional facilities. Examples of excluded facilities include, but are not limited to:

- Institutional accommodations and visitor accommodations;
- Vacation facilities, such as bed and breakfasts, hotels, motels and short-term vacation rentals;
- Vacation facilities, such as rental, co-operative, fractional ownership, time-share or condominium accommodation associated with sports and leisure facilities (e.g., lake resorts); and
- Residences at which medical care is provided, such as nursing homes, long-term care facilities and hospices.

4. Program Design and Phases

4.1 Supply Chain Design

The design of the MMSW program and the transition phases described below will be driven by the objective of continuous improvement in the management, operation, and environmental outcomes of Saskatchewan's PPP recycling system.

The following delivery principles will guide the detailed design work associated with each of the program's transition phases:

- **Focus on outcomes, not process** – maximize recovery, program efficiency and system effectiveness;
- **Provincial accessibility** – provide fair, reasonable, efficient and effective levels of collection service to all regions of Saskatchewan;
- **Provide economic incentives and set simple rules** – effective economic incentives will drive behaviour that increases recovery activity throughout the PPP reverse supply chain; simple rules will provide clarity and certainty to those collecting and recycling PPP;
- **Foster interaction, collaboration and competition to drive innovation** – innovation is the result of complex interactions of ideas and efforts among producers and private, public, and not-for-profit entities with parties bringing together complimentary skills to collaborate and deliver more value; and

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- **Set the stage for evolution** – harness existing activities and build on success through continuous improvement and use of economic incentives to increase collection of PPP and improve system efficiency.

4.2 Collection System

Under the current shared responsibility model, local governments and Regional Waste Authorities (RWAs) provide household collection and/or depot collection services to their residents and to some First Nations and Métis communities. Under the transition phases outlined below, MMSW will move towards the application of standardized definitions, eligibility criteria and policies and procedures for the following collection service types:

- Curbside collection;
- Multi-family collection; and
- Depot collection.

Definitions for each service type are provided in the sections below.

MMSW's approach to the delivery of curbside, multi-family and depot collection services will be to contract with collection service providers which meet MMSW's eligibility criteria, are able to follow the program's collection policies and procedures and which will assist MMSW in achieving its program targets and commitments. Under the current shared responsibility model, MMSW developed a set of policies and procedures that enable tracking and reporting of sources and quantities of PPP as well as best practices to ensure an efficient and effective collection system. The current policies and procedures for the shared responsibility model are outlined in the MMSW Services Agreement available on the MMSW [website](#).

Updated collection policies and procedures will be developed in collaboration with the working groups associated with each of the transition phases, as outlined below, which will include provisions to ensure all federal, provincial and municipal laws are followed.

MMSW will collaborate with municipalities on other municipal waste services such as garbage and organics collection to ensure a coordinated approach on service details such as collections schedules, cart placement locations, assisted collection and customer service procedures where feasible and practical, and to ensure a practical approach to enforcing applicable by-laws and collection standards.

Where a competitive procurement process is utilized for the provision of collection services, as outlined below, potential service providers will be evaluated on a number of factors, including:

- Responsiveness and capacity to effectively communicate;
- Operational knowledge, adaptability and experience;
- Access to required infrastructure and equipment;
- Ability to innovate and drive operational efficiencies;
- Commitment to sustainability and environmental improvement;
- Approach to customer service;
- Reporting capabilities; and
- Pricing.

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4.2.1 Accepted Materials

Under the current shared responsibility model, it is the responsibility of each collector to determine the types of PPP compatible with their collection and post-collection system. MMSW will work to expand and harmonize the list of accepted materials across all applicable collectors concurrent with the implementation of each transition phase outlined below. MMSW will target PPP for collection that is supplied by producers, is compatible with the collection and processing system that MMSW will be establishing and has commercially viable end markets consistent with the waste management hierarchy.

A detailed accepted material list (accepted PPP) will be developed during the design phase of each of the transition phases outlined below. As the list of accepted materials differs across processing facilities at present, MMSW must first engage with processors and procure processing capacity before the exact accepted material list can be confirmed.

Examples of the materials that will be targeted as accepted PPP in Transition Phase 1 and 2 include:

- Paper and Cardboard – materials such as newspaper flyers, magazines, envelopes, paper gift wrap, cardboard and boxboard boxes, cardboard packaging, boxboard packaging, paper carrier trays and paper bags;
- Mixed Containers – materials such as rigid plastic bottles, jugs, tubs, clamshells and trays, metal containers, paper cups for hot and cold beverages, aseptic containers for soups, sugar, molasses, etc., polycoated cartons and tubs for cream, frozen desserts, etc.; and
- Glass Bottles and Jars – clear and coloured non-deposit glass bottles and jars.

Examples of additional materials that will be targeted as accepted PPP in Transition Phase 3 include:

- Flexible Plastics – materials such as bags for groceries, bags for produce and dry bulk foods and outer bags and wrap for paper towels, soft drink flats etc. and materials such as stand-up and zipper-lock pouches, crinkly wrappers and bags, flexible packaging with a plastic seal, non-food protective packaging and woven and net plastic bags; and
- Foam Packaging – white and coloured polystyrene foam packaging such as foam meat trays, cups, egg cartons and cushion packaging.

Materials such as Glass Bottles and Jars, Flexible Plastics and Foam Packaging may be targeted for collection in a segregated manner (separated from all other categories of PPP) or through depot collection only to ensure the marketability and recyclability of collected PPP.

The MMSW collection system will exclude a small subset of PPP types that are uniquely disruptive to the program's collection or post-collection system, present a hazard to collection and post-collection staff and/or that do not have commercially viable end markets, referred to as not accepted PPP. Examples include polyvinyl chloride (PVC) packaging, compostable plastics, plastic squeeze tubes and PPP still containing hazardous materials. Producers of these types of PPP captured under Program Plan and the Regulation are still required to pay fees on their supply to support the recycling system. Where opportunities are identified, these materials may also incur cost to develop strategies that move them towards acceptance in the program's collection system.

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MMSW will regularly conduct the following activities as it relates to PPP types not currently accepted for collection (not accepted PPP), with the ultimate goal of accepting all PPP types supplied by producers in the program's collection system:

- Conduct analyses to estimate the percentage of supplied PPP that is accepted vs. not accepted for collection;
- Complete a representative sample of composition audits of collected PPP to estimate the percentage of not accepted PPP included in collected PPP and its impact on the collection and post-collection systems;
- Conduct research and analyses on the barriers to acceptance of not accepted PPP and best practices in other jurisdictions; and
- Engage with processors and end markets to explore opportunities to target the collection of not accepted PPP without compromising the recyclability and value of accepted PPP types.

During Transition Phase 3, MMSW will conduct research on municipal programs for green waste in Saskatchewan and submit this information to the Ministry, including whether any programs are targeting the collection of compostable plastics.

4.2.2 Curbside Collection

Curbside collection is defined as the collection of PPP from single-family dwellings, buildings with up to four households and row house complexes with any number of households where each household sets out material separately for collection on a weekly or bi-weekly basis. Transition Phases 1 and 2 will focus on the roll-out of curbside collection under the full producer responsibility model.

4.2.3 Multi-Family Collection

The term “multi-family collection” is used today in a variety of contexts to describe different collection approaches to delivering collection services to residents that live in multi-family (i.e., multi-unit) residential complexes, including unstaffed neighbourhood bins in public locations designed to service multiple neighbourhoods.

Moving forward, and for the purposes of its use in this document, multi-family collection is defined as the collection of PPP from residential complexes with five or more units where all households deposit their recycling at a centralized location in shared containers located at or immediately adjacent to (and on the same property as) the residential complex.

Together with curbside collection, Transition Phases 1 and 2 will focus on the roll-out of multi-family collection under the full producer responsibility model.

4.2.4 Depot Collection

Depot collection is defined as the collection of PPP at a location operated by a collection service provider under agreement with MMSW at which PPP is received from residents. Depots can provide collection services of all categories of accepted PPP in smaller communities without curbside and multi-family collection. They can also provide additional collection opportunities to residents in communities

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with curbside and multi-family collection, in particular the categories of accepted PPP not collected through curbside and multi-family service (e.g., flexible plastics).

Transition Phase 3 will focus on the roll-out of depot collection under the full producer responsibility model.

4.2.5 Collection Incentives

Consistent with an outcomes-based approach to program operations, MMSW will offer financial incentives to collectors participating in the program. These incentives will be designed to provide collectors with sufficient incentive to collect the amount of PPP required by MMSW to meet its targets and to cover fair and reasonable collection costs borne by contracted collectors operating efficient programs.

On the schedule outlined in the transition phases below, MMSW will develop a set of revised financial incentives to propose to eligible collectors for each transition phase based on the results of a detailed cost study. As MMSW last conducted a cost study in 2022, this study's data will be used to guide the curbside and multi-family incentive rates for Transition Phases 1 and 2. As the roles and responsibilities of collection service providers under Transition Phases 1 and 2 will differ from the services provided under current service agreements (e.g., collection service providers will no longer be required to procure post-collection services), the incentive rates offered will reflect this new outcome.

During the design stage of Transition Phase 3, MMSW will engage a third-party accounting firm and undertake a collection cost study and associated analyses to develop depot incentive rates and assess the curbside and multi-family incentives applied in Transition Phases 1 and 2 in the current market context. As in past years, MMSW will work with the Advisory Committee in determining its approach to these studies. Upon completion of the cost study in the design stage of Transition Phase 3, MMSW will complete an updated cost study every three years.

Once new collection service agreements have been offered to eligible collectors, inclusive of the new financial incentives, each applicable collector must then decide whether to enter into a service agreement with MMSW.

MMSW will directly pay the costs of collecting PPP after the successful completion of a competitive procurement process has been applied by MMSW with private collection companies, as applicable.

Section 4.4.12 below outlines the process and timelines associated with payments to non-transitioned collectors delivering recycling services under the shared responsibility model.

4.3 Post-Collection System

Collectors currently providing collection services under the shared responsibility model are also required to procure post-collection services, including the processing and marketing of collected PPP. Moving forward, MMSW will be responsible for all aspects of post-collection, including receiving, processing, marketing, and transporting PPP collected under the transition phases outlined below. Collection service providers accepting an offer from MMSW and participating in one or more transition phases will no longer be responsible for post-collection services.

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MMSW's approach to designing and procuring a post-collection system is outlined in the transition phases below.

The MMSW post-collection network and approach to procurement will focus on six key outcomes:

- Investment in recycling infrastructure;
- System efficiency with minimal redundancy;
- Prioritization of local and regional end markets;
- Environmental performance and the management of material as high as possible in the waste prevention hierarchy;
- Clear and transparent business processes; and
- Ongoing innovation and technology.

To ensure that a post-collection network can effectively and efficiently handle the material in the program, four key design aspects will be considered: location and types of facilities, chain of custody, quality of materials, and responsible end markets.

MMSW recognizes the significant contribution that private companies and social enterprises have made in Saskatchewan in building and managing recycling infrastructure. MMSW is committed to engaging with related organizations directly to ensure the interests of those that have invested social and capital infrastructure into the province's recycling system can be considered. This will include meaningful discussions on operational requirements, capabilities and the social and economic value of existing operations, with the goal of finding mutually beneficial relationships and arrangements.

To build trust and confidence in the recycling system, and therefore participation, it is imperative that residents have confidence that the materials they place out for recycling reach an end market. As such, concurrent with each transition phase, MMSW will ensure the complete chain of custody of its material by recording and tracking the material from the point it is received from a collector up until its receipt at an approved end market. This requires not only the accurate tracking of data, but also a program of composition audits and the ongoing monitoring of mass balance performance. This gives MMSW assurance that what comes into the program and passes through the various nodes of the post-collection network, ultimately reach an approved end market.

The design of the post-collection network is done with intent, such that the way the materials are handled and processed allow for best and highest use in their next life while ensuring resilience and redundancy for contingency planning and effective use of producer members' fees. Through the careful design of the post-collection network, not only can materials be separated more effectively, but they will be of a quality demanded by local and regional end markets. Strategic design of the post-collection network also ensures that greenhouse gas (GHG) emissions are considered and reduced, where applicable, at each stage of the post-collection system. Consolidation and processing facilities strategically located to drive efficient transportation of collected PPP and a focus on local end markets, for example, will reduce GHG emissions associated with transportation.

To ensure these carefully collected and processed materials, now commodities, are responsibly recycled, MMSW will perform due diligence on every end market before approval and at regular

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intervals thereafter. This can include site visits, review of historic performance, compliance to local laws and regulations, and any other means to establish the reputation and performance of an end market.

When selecting end markets for materials, MMSW will give priority first to local markets, then regional markets, then to those located in countries that are members of the Organization for Economic Co-operation and Development (OECD). MMSW will consider end markets for processed PPP located in countries that are not members of OECD only if the end market meets or exceeds environmental, health and safety standards equivalent to OECD standards.

4.4 Transition Phases

The following sections outline MMSW's proposed transition phases, the activities included in each and the relevant timelines. For a summary of the transition phases, please refer to Section 4.4.13 below.

4.4.1 Consultation

MMSW's draft Program Plan was posted on the MMSW website on June 13, 2023 and distributed to relevant program parties.

Between June 13 and August 13, 2023, MMSW conducted a detailed public consultation process on the draft Program Plan. The timelines of this process were dictated by the requirement to submit a draft Program Plan to the Ministry by September 27, 2023.

The following groups were engaged as part of this consultation process:

- Local governments;
- Regional Waste Authorities (RWAs);
- First Nations and Métis;
- Private companies involved in PPP management;
- MMSW Advisory Committee;
- MMSW producer members;
- Producer Responsibility Organizations (PROs);
- Producer associations;
- Social enterprises and abilities councils;
- Environmental groups; and
- Saskatchewan residents.

Written feedback and comments were accepted by MMSW until August 13, 2023.

Recordings of consultation sessions and the consultation report are posted on MMSW's [website](#).

Additional consultation opportunities will be available to interested parties under the transition phases outlined below, including consultation pertaining to the Community Curbside and Multi-Family Collection Eligibility Criteria applicable to Transition Phase 2, the Depot Collection Eligibility Criteria applicable to Transition Phase 3 and the performance targets referenced in Section 5.3.4.

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In addition, MMSW will be engaging directly with First Nation and Métis communities and organizations on an appropriate process and timeline for additional and dedicated consultations on their involvement in recycling opportunities. This will be conducted in four stages:

Stage 1 will focus on building relationships with applicable First Nations and Métis organizations by introducing these organizations to MMSW team members and providing key background information for the program, product stewardship, and the transition to the full EPR model. A list of potential groups to include are the Federation of Sovereign Indigenous Nations, Saskatchewan Indian Cultural Centre, Association of Métis, Non and Status Indians Saskatchewan, Central Urban Métis Federation, Gabriel Dumont Institute, the various tribal councils of Saskatchewan, Métis regional offices and the Office of the Treaty Commissioner.

Stage 2 will focus on engaging with these various organizations and/or communities to learn how best to conduct culturally relevant, respectful and effective engagement on residential recycling and inclusion in a full EPR program in Saskatchewan.

Stage 3 will include dedicated engagement with First Nations and Métis organizations and communities, bringing all learning and insights from Stage 2 into the process.

Stage 4 will incorporate results from this engagement into MMSW's development of a meaningful model for First Nations and Métis participation in PPP recycling opportunities.

4.4.2 Program Plan Submission and Approval

In accordance with the Regulatory deadline, the draft Program Plan was submitted to the Ministry on September 27, 2023. As several implementation tasks cannot be completed until an approved Program Plan is in place, the timing of Ministry approval will inform the phased implementation timeline. Transition timeline phases are therefore referenced by the number of months following Program Plan approval.

As several major program components cannot be developed until elements of the transition phases described below are implemented, MMSW will submit to the Ministry a total of three formal submissions for approval. Each submission will include a dedicated consultation period with relevant parties in advance of submission.

The following table summarizes the major Program Plan component that is addressed by each submission as well as the timeline for MMSW's submission to the Ministry. For more details on each Program Plan component, refer to the relevant Program Plan Section referenced in the table below. Submission Number 1 and 2 will be considered formal amendments to the Program Plan.

Submission Number	Program Plan Component	Program Plan Reference	Submission Timeline
1	Community Curbside and Multi-family Collection Eligibility Criteria/ Phase 2 Efficiency Criteria	Section 4.4.6 and 4.4.7	Launch of Transition Phase 1
2	Depot Collection Eligibility Criteria and collection standards, policies	Section 4.4.9	Launch of Transition Phase 2

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	and procedures for depot collection		
3	Performance Targets	Section 5.3.4	Launch of Transition Phase 3 + 12 months

MMSW reserves the right to submit Program Plan amendments prior to this timeline if it is determined that approval of the applicable Program Plan component is required earlier during the transition process. As certain implementation tasks may not be able to be completed until approval of the applicable Program Plan amendment is received, the implementation timeline of subsequent transition phases may be delayed by MMSW if Ministry approval takes more than 90 days from the date of submission.

4.4.3 Transition Phase 1 Design

Transition Phase 1 will be centered on curbside and multi-family collection from eligible communities, as determined during the design and procurement phases. There are several parallel and sequential activities that must occur to develop the collection and post-collection systems required to support this phase. Relevant activities include:

- Continue to compile information from MMSW collectors which will impact the timing of their possible participation in transition phases, including existing recycling service providers, contracts and assets;
- Establish and engage regularly with a Transition Phase 1 Working Group of communities targeted for inclusion in Transition Phase 1;
- Complete a market sounding exercise with social enterprises and private companies involved in the collection, transportation, receiving, and processing of PPP to ensure the interests of those that have invested social and capital infrastructure into the province’s recycling system are considered;
- Finalize collection policies and procedures for curbside and multi-family collection;
- Develop a Master Service Agreement (MSA) and Statement of Work (SOW) for curbside and multi-family collection and post-collection services;
- Design collection and post-collection catchment area(s) and define eligible communities for Transition Phase 1;
- Develop a procurement process and applicable documents for post-collection services, including transporters, receiving facilities and processing facilities;
- Develop incentive rates for collection service providers in Transition Phase 1 informed by the results of MMSW’s 2022 Cost Study; and
- Finalize an accepted material list for residential curbside and multi-family programs included in Transition Phase 1 that leverages the capacity of potential post-collection service providers.

To design efficient and effective catchment area(s) for Transition Phase 1, MMSW will target logical post-collection flows from one or more clusters of large communities. For clarity, MMSW will be targeting communities that meet each of the following eligibility criteria for Transition Phase 1:

- Municipalities with existing curbside and/or multi-family participating in the MMSW program;
- A minimum population of 3,500 residents; and
- A maximum of a 300 km drive distance to the City of Regina or the City of Saskatoon.

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The list of communities targeted for inclusion in Transition Phase 1 as well as the accepted material list for residential curbside and multi-family programs included in Transition Phase 1 will be submitted to the Ministry three months prior to the launch of Transition Phase 1.

As noted above, MMSW will be establishing a Transition Phase 1 Working Group comprised of administrative representatives of communities targeted for inclusion in Transition Phase 1 that are interested in participating in further engagement with MMSW and their peers, as well as the Saskatchewan Urban Municipalities Association (SUMA). While the exact terms of reference of the group will be developed in partnership with attendees, the goal of the group is to foster collaboration and provide opportunity for communities to help shape the direction of Transition Phase 1. Meetings will act as a forum for the two-way exchange of information, questions and feedback on the design and operation of Transition Phase 1. Key Transition Phase 1 elements that attendees will have the opportunity to review and provide feedback on include the proposed MSA, curbside and multi-family SOW, collection incentives and contamination threshold.

MMSW has initiated many of these activities and this work will continue through the Program Plan review and approval process.

4.4.4 Transition Phase 1 Procurement

The procurement process for collection and post-collection services will commence once the Program Plan approval process has successfully concluded. Without an approved Program Plan in place, MMSW does not have the basis to release procurement documents, negotiate terms or sign agreements for the collection and post-collection services associated with Transition Phase 1.

This implementation phase will commence with a competitive procurement process to procure post-collection services in the catchment area(s) targeted for Transition Phase 1, which will include one or more facilities to receive the PPP delivered by collection service providers, as well as the services required to transport, consolidate, process and market received PPP as applicable.

Communities eligible under Transition Phase 1 will have three primary options to consider for participation in Transition Phase 1:

- The community-led collection model;
- The program-led collection model; or
- Continuation of the shared responsibility model.

Further details are provided on each model below:

Community-Led Collection Model

Under the community-led collection model, eligible communities will continue to provide curbside and/or multi-family collection services in their community while acting as a collection service provider to MMSW. Communities will receive a formal offer to participate in Transition Phase 1 as a collection service provider, including an MSA, curbside SOW, multi-family SOW (if applicable), and the applicable incentive rates. They will have the opportunity to review these documents and consider whether to accept MMSW's offer, sign the applicable collection agreements, and participate in Transition Phase 1 as a collection service provider for curbside and/or multi-family collection. These offers will extend to

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multi-family collection if the community currently operates a multi-family collection program under the MMSW program.

To ensure that communities have sufficient time to consider MMSW's offer and the associated documents, eligible communities that are interested in considering MMSW's offer may establish a review, signing and participation timeline for Transition Phase 1 that reflects their internal decision-making process and operational realities (including the timing of their service provider contracts). MMSW will establish and communicate launch "windows" every three months, each with a respective deadline in advance for offer acceptance, the first of which will coincide with the launch of Transition Phase 1. Eligible communities will not be required to launch on the first eligible day of Transition Phase 1 but may choose the quarterly launch window that best corresponds with their preferred timeline, if applicable. As part of this process, MMSW will work directly with eligible communities to understand their current recycling service provider contracts and assets and work to develop timelines and solutions that promote a smooth transition in Phase 1.

Program-Led Collection Model

Communities eligible under Transition Phase 1 that no longer wish to provide curbside collection services to their residents will have the opportunity to request to have MMSW directly operate curbside collection services in their community. In these communities, MMSW will be responsible for all aspects of the management of curbside collection services to residents.

The program-led collection model will not be available to communities at the launch of Transition Phase 1. This option will be available at a later date to ensure communities have sufficient time to consider this option. MMSW also requires sufficient notice to complete a competitive procurement process in applicable communities, and for the private collection contractor selected by MMSW through that process to purchase collection vehicles and prepare for service provision.

Such requests will be considered and approved by MMSW provided each of the following criteria is met:

- The community meets the criteria outlined in Section 4.4.3 above;
- The request is made in writing and is accompanied by a formal resolution from the applicable Council;
- A formal commitment is made, in writing, to provide MMSW with all reasonable assistance and cooperation during the transition period (e.g. provision of a complete address list, household data etc.);
- The request pertains to the entire service area and not a portion thereof;
- A curbside garbage collection program is in place in the service area or scheduled to launch no later than the proposed transition date; and
- The request is made by the deadline communicated by MMSW.

Requests for MMSW to directly operate multi-family collection services in a community eligible for Transition Phase 1 will be considered and approved by MMSW, provided each of the following criteria is met:

- The community meets the criteria outlined in Section 4.4.3 above;
- The community currently operates a multi-family collection program under the MMSW program that includes a minimum of 50% of the community's multi-family households;

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- The request is made in writing and is accompanied by a formal resolution from the applicable Council;
- A formal commitment is made, in writing, to provide MMSW with all reasonable assistance and cooperation during the transition period (e.g. provision of a complete address list, building data etc.);
- The request pertains to the entire service area and not a portion thereof;
- A multi-family garbage collection program is in place in the service area or scheduled to launch no later than the proposed transition date; and
- The request is made by the deadline communicated by MMSW.

During the transition period, MMSW will establish and communicate an annual deadline for eligible communities that meet the above criteria to make such requests. The first such deadline will occur three months after the commencement of Transition Phase 1 to provide additional time for eligible communities to consider this option. Eligible communities that do not wish to make such a request for this first deadline will have additional opportunities on an annual basis during the transition period, at their discretion. The launch of curbside and/or multi-family collection service directly by MMSW in communities that have requested this option will be a minimum of two years after the applicable deadline and request by the community. MMSW will work closely with communities considering this option to determine whether the deadline and associated launch dates can be aligned with the expiration of their service provider contracts, if applicable.

Eligible communities that make or are considering such requests will be encouraged, but not required, to accept MMSW's offer to participate in Transition Phase 1 as a collection service provider (community-led collection model) to bridge the period between the launch of Transition Phase 1 and the launch of curbside collection service provided directly by MMSW. In this scenario, the end date of the communities' MSA and curbside SOW would be adjusted to reflect this timeline.

Continuation of the Shared-Responsibility Model

Communities eligible under Transition Phase 1 that need additional time to consider the two above options will continue to receive payments in accordance with the terms of their existing agreements under the shared responsibility model, in accordance with the conditions and timelines outlined in Section 4.4.12.

4.4.5 Transition Phase 1 Implementation

Transition Phase 1 will commence on the first business day of the first month following six months after approval of the Program Plan.

Upon the launch of Transition Phase 1, MMSW will assume full financial and operational control of the collection, transportation, receiving, processing, and marketing of PPP collected under this phase. This will be exercised via collection service agreements with eligible communities and by directly procuring post-collection services. If applicable, MMSW will provide curbside and/or multi-family collection services directly in eligible communities that have made such requests, in accordance with the criteria and timelines outlined in Section 4.4.4.

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4.4.6 Transition Phase 2 Design

To build on the success of the previous phase, Transition Phase 2 will continue the focus on curbside and multi-family collection in smaller and more remote communities that are not eligible under Transition Phase 1, as well as multi-family collection in Transition Phase 1 communities that do not meet the multi-family thresholds outlined in Section 4.4.4. MMSW will complete the following activities to design and procure the collection and post-collection systems required for this phase:

- Establish and engage regularly with a Transition Phase 2 Working Group of communities identified for inclusion in Transition Phase 2;
- Develop draft Community Curbside and Multi-family Collection Eligibility Criteria for smaller communities, including remote, Northern and First Nations and Métis communities, as well as Transition Phase 1 communities without established multi-family collection programs that do meet the multi-family eligibility requirements outlined in Section 4.4.3 and 4.4.4, with input from relevant parties;
- Consult with relevant parties on the draft eligibility criteria;
- Design collection and post-collection catchment areas based on the finalized eligibility criteria;
- Develop policies and procedures as well as SOWs for curbside and multi-family collection in eligible communities if differences are warranted in smaller communities;
- Develop an approach to procuring collection services in smaller communities which will establish scenarios where:
 - Directly contracting private waste companies servicing multiple communities along a collection route or regional approaches to collection can achieve improved administrative, operational and environmental efficiencies; and
 - Offers will be extended to municipalities, RWAs, First Nations and Métis communities that wish to maintain operational oversight of curbside and multi-family collection service, where warranted;
- Develop a procurement process and applicable documents for post-collection services, including transporters, receiving facilities and processing facilities for all catchment areas;
- Develop incentive rates for collection service providers in Transition Phase 2 informed by the results of MMSW's 2022 Cost Study; and
- Apply any changes to the accepted material list based on learnings from Transition Phase 1 and that leverages the capacity of any post-collection service providers added to the program, if applicable.

The list of communities targeted for inclusion in Transition Phase 2 as well as the accepted material list for residential curbside and multi-family programs included in Transition Phase 2 will be submitted to the Ministry three months prior to the launch of Transition Phase 2.

As noted above, MMSW will be establishing a Transition Phase 2 Working Group comprised of administrative representatives of communities identified for inclusion in Transition Phase 2 that are interested in participating in further engagement with MMSW and their peers, as well as the Saskatchewan Urban Municipalities Association (SUMA), the Saskatchewan Rural Municipalities Association (SARM), and the Association of Regional Waste Management Authorities of Saskatchewan (ARWMAS). While the exact terms of reference of the group will be developed in partnership with attendees, the goal of the group is to foster collaboration and provide opportunity for communities to help shape the direction of Transition Phase 2. Meetings will act as a forum for the two-way exchange of

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information, questions and feedback on the design and operation of Transition Phase 2. Key Transition Phase 2 elements that attendees will have the opportunity to review and provide feedback on include the Community Curbside and Multi-family Collection Eligibility Criteria, Phase 2 Efficiency Criteria (see Section 4.4.7), collection policies and procedures, the proposed curbside and multi-family SOW, collection incentives and contamination threshold.

4.4.7 Transition Phase 2 Procurement

A competitive procurement process for any required post-collection services for the applicable catchment areas will ensure the provision of receiving facilities for collection service providers and sufficient capacity to transport, consolidate, process and market the additional PPP received from collection service providers in this phase.

Collection under Transition Phase 2 will be managed under three models:

- The community-led collection model;
- The program-led collection model; or
- Continuation of the shared responsibility model.

Community-Led Collection Model

Given the significant number of small, rural and remote communities that will be identified for Transition Phase 2, MMSW aims to develop and implement an approach to collection procurement that reduces administrative burdens, fosters operational efficiencies, drives environmental improvement and builds on regional economies of scale. Communities and RWAs eligible under Transition Phase 2 that wish to provide curbside and/or multi-family collection services in their community, and that can demonstrate that such efficiencies and improvements can best be achieved by the continuance of this role, will be given the opportunity to act as a collection service provider to MMSW under Transition Phase 2 upon request. In collaboration with the Transition Phase 2 Working Group, MMSW will develop detailed Phase 2 Efficiency Criteria to consider and fairly judge such requests, as well as associated deadlines for confirmation of a community's preferred approach.

Eligible communities that meet the Phase 2 Efficiency Criteria, including municipalities, RWAs and/or First Nations and Métis communities, will receive a formal offer to participate in Transition Phase 2, including an MSA, curbside SOW, multi-family SOW (if applicable) and the applicable incentive rates. They will have the opportunity to review these documents and consider whether to accept MMSW's offer, sign the applicable collection agreements and participate in Transition Phase 2 as a collection service provider for curbside and/or multi-family collection.

Eligible communities that are interested in considering MMSW's offer may establish a review, signing and participation timeline for Transition Phase 2 that reflects their internal decision-making process and operational realities and will not be required to launch on the first eligible day of Transition Phase 2. MMSW reserves the right to set specific launch opportunities within the transition phase in advance (e.g., quarterly "launch windows"), each with respective deadlines for offer acceptance and to group communities as required to ensure catchment area efficiency.

Program-Led Collection Model

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In communities eligible under Transition Phase 2 that do not wish to provide curbside and/or multi-family collection services in their community or that do not meet the Phase 2 Efficiency Criteria, MMSW will directly operate collection services. In these communities, MMSW will be responsible for all aspects of the management of collection services to residents and will procure collection services with private waste haulers directly.

Continuation of the Shared-Responsibility Model

Communities eligible under Transition Phase 2 that need additional time to consider their options will continue to receive payments in accordance with the terms of their existing agreements under the shared responsibility model, in accordance with the conditions and timelines outlined in Section 4.4.12.

A minimum of twelve months will be required for this transition phase given the complexity of the tasks outlined above as well as the need to consult with relevant parties on the development of Community Curbside and Multi-Family Collection Eligibility Criteria.

4.4.8 Transition Phase 2 Implementation

Transition Phase 2 will commence the first business day of the first month following twelve months after the commencement of Transition Phase 1 Implementation. Upon the launch of Transition Phase 2, MMSW will assume full financial and operational control of the collection, transportation, receiving, processing, and marketing of PPP collected through curbside and multi-family programs included in this phase. This will be exercised via collection service agreements with private waste companies and/or eligible municipalities, RWAs and/or First Nations and Métis communities and by directly procuring post-collection services.

4.4.9 Transition Phase 3 Design

Transition Phase 3 will focus on system optimization and the addition of depot collection, which will complete the transition to a program fully funded and operated by the producers of PPP. MMSW will complete the following activities to design and procure the collection and post-collection systems required for this phase:

- Establish and engage regularly with a Transition Phase 3 Working Group of relevant parties;
- Develop draft Depot Collection Eligibility Criteria for smaller communities, including remote, Northern and First Nations and Métis communities with input from relevant parties;
- Consult with relevant parties on the draft Eligibility Criteria;
- Finalize collection standards, policies and procedures for depot collection that ensure high quality of collected material;
- Develop a MSA and SOW for depot collection services;
- Develop a procurement process and applicable documents for depot collection services;
- Engage a third-party accounting firm and undertake a collection cost study and associated analyses to develop depot incentive rates as well as to assess the curbside and multi-family incentives applied in Transition Phases 1 and 2 in the current market context;
- Develop a procurement process and applicable documents for additional post-collection services; and
- Finalize an accepted material list for depot collection, including additional targeted materials

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such as flexible plastics, foam packaging and glass bottles and jars not compatible with commingled curbside and multi-family collection.

The list of communities identified for inclusion in Transition Phase 3 as well as the accepted material list for depot collection included in Transition Phase 3 will be submitted to the Ministry three months prior to the launch of Transition Phase 3.

As noted above, MMSW will be establishing a Transition Phase 3 Working Group comprised of relevant parties that are interested in participating in further engagement with MMSW and their peers. While the exact terms of reference of the group will be developed in partnership with attendees, the goal of the group is to foster collaboration and provide opportunity for communities to help shape the direction of Transition Phase 3. Meetings will act as a forum for the two-way exchange of information, questions and feedback on the design and operation of Transition Phase 3. Key Transition Phase 3 elements that attendees will have the opportunity to review and provide feedback on include the Depot Collection Eligibility Criteria, collection standards, policies and procedures for depot collection, the depot SOW and depot incentive rates.

4.4.10 Transition Phase 3 Procurement

The procurement process for Transition Phase 3 will commence upon the successful implementation of Transition Phase 2.

This implementation phase will commence with a competitive procurement process for any additional post-collection services required, as well as sufficient capacity to transport, consolidate, process and market the additional PPP received from collection service providers in this phase.

Eligible depot collectors, based on the Depot Collection Eligibility Criteria, will receive a formal offer to participate in Transition Phase 3, including an MSA, depot SOW, and the applicable incentive rates. They will have the opportunity to review these documents and decide whether to accept MMSW's offer, sign the applicable collection agreements and participate in Transition Phase 3 as a collection service provider for depot collection. MMSW will seek to develop a depot collection network that provides convenience and accessibility while reducing duplication and fostering system efficiencies and optimization.

Eligible depot collectors that are interested in considering MMSW's offer may establish a review, signing and participation timeline for Transition Phase 3 that reflects their internal decision-making process and operational realities and will not be required to launch on the first eligible day of Transition Phase 3. MMSW reserves the right to set specific launch opportunities within the transition phase in advance (e.g., quarterly "launch windows"), each with respective deadlines for offer acceptance, and to stagger launch timelines to ensure catchment coverage and logistical efficiency.

A minimum of twelve months will be required for this transition phase given the complexity of the tasks outlined above as well as the need to consult with relevant parties on the development of Depot Collection Eligibility Criteria.

4.4.11 Transition Phase 3 Implementation

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Transition Phase 3 will commence the first business day of the first month following twelve months after the commencement of Transition Phase 2 Implementation. Upon the launch of Transition Phase 3, MMSW will assume full financial and operational control of the collection, transportation, receiving, processing and marketing of PPP collected through depots, thereby completing the proposed transition process. This will be exercised via collection service agreements with depot collectors and by directly procuring post-collection services.

Any changes required to the curbside and multi-family incentives rates stemming from the updated collection cost study will apply to all applicable curbside and multi-family collection service providers (including those that launched as part of Transition Phases 1 and 2), effective as of the launch date of Transition Phase 3.

4.4.12 Payments to Non-Transitioned Collectors

MMSW collectors registered with MMSW as of June 1, 2023 will continue to receive payments in accordance with the terms of their existing agreements under the shared responsibility model until any one of the following conditions is met:

- An offer is accepted for collection services in accordance with one of the transition phases outlined above;
- Another organization has established a collection services agreement with MMSW to provide curbside, multi-family and/or depot collection services in the applicable community; or
- All transition phases outlined above are complete, defined as one year after the commencement of Transition Phase 3 Implementation.

The effective date of the termination of payments under existing service agreements will align with the service commencement date of any applicable new collection service agreements and a termination agreement will be signed by both parties effective that date. If an offer is accepted or a collection services agreement is established with another organization for only one collection service type (e.g. curbside collection) but the MMSW collector’s current agreement includes additional collection service types not covered by the accepted offer or new collection services agreement, the MMSW collector’s agreement will be amended to permit payments to continue for the applicable collection service types.

This approach will allow existing MMSW collectors sufficient time to consider offers provided by MMSW while providing for the timely wind down of the shared responsibility model. For clarity, any remaining payments to MMSW collectors under existing service agreements will end as of one year after the commencement of Transition Phase 3 Implementation.

4.4.13 Transition Phases Overview

The following table provides a summary of each of the transition phases outlined above.

Transition Phases	Transition Phase Overview	Timeline
Consultation	<ul style="list-style-type: none"> • Program Plan released June 13, 2023 • Consultation between June 13 and August 13, 2023 • Written feedback accepted until August 13, 2023 	June 13 – August 13, 2023

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Program Plan Submission & Approval	<ul style="list-style-type: none"> • Submission of Program Plan September 27, 2023 • Review and approval of Program Plan by Ministry 	Approval per Ministry timeline
Transition Phase 1 Design	<ul style="list-style-type: none"> • Compile information from MMSW collectors and complete markets analysis • Develop collection policies and procedures, collection agreements and incentive rates • Design catchment area(s) and eligible communities • Develop procurement process and documents • Finalize curbside/multi-family accepted material list 	Ongoing
Transition Phase 1 Procurement	<ul style="list-style-type: none"> • Competitive procurement process for post-collection services • Release of collection agreements and incentive rates to eligible communities 	6 month period following Program Plan approval
Transition Phase 1 Implementation	<ul style="list-style-type: none"> • Launch of curbside and multi-family collection with applicable communities 	The latter of approval + 6 months or July 1, 2024
Transition Phase 2 Design	<ul style="list-style-type: none"> • Develop and consult on Community Curbside and Multi-Family Collection Eligibility Criteria • Develop procurement process for eligible curbside and multi-family communities • Design catchment areas, collection agreements and incentive rates • Apply changes to accepted material list, as applicable 	Ongoing
Transition Phase 2 Procurement	<ul style="list-style-type: none"> • Competitive procurement process for post-collection services • Competitive procurement process for collection services, as applicable • Release of collection agreements and incentive rates to eligible communities as applicable 	12 month period following commencement of Transition Phase 1 Implementation
Transition Phase 2 Implementation	<ul style="list-style-type: none"> • Launch of curbside and multi-family collection with applicable communities 	Transition Phase 1 Implementation + one year
Transition Phase 3 Design	<ul style="list-style-type: none"> • Develop and consult on Depot Collection Eligibility Criteria • Complete cost study on all collection channels and develop depot incentive rates • Complete assessment on option of MMSW providing curbside/multi-family collection directly in applicable communities • Develop procurement process and documents • Finalize depot accepted material list 	Ongoing
Transition Phase 3 Procurement	<ul style="list-style-type: none"> • Competitive procurement process for post-collection services 	12 month period following commencement of Transition Phase 2

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	<ul style="list-style-type: none"> • Release of collection agreements and incentive rates to depot collectors 	Implementation
Transition Phase 3 Implementation	<ul style="list-style-type: none"> • Launch of depot collection • Application of updated curbside/multi-family incentive rates 	Phase 2 + one year
Payments to Non-Transitioned Communities	<ul style="list-style-type: none"> • Payments to continue until offer accepted or transition phases complete 	Ongoing, until 12 months following commencement of Transition Phase 3 Implementation

4.5 National Integration

MMSW is working with the national, not-for-profit producer led PRO, Circular Materials, to provide Saskatchewan residents and producers with the benefits of a nationally integrated approach to recycling. This approach is designed to provide residents with a high level of service and enable producers to meet the ambitious requirements outlined within the Regulation while focusing on productivity gains that come with national integration.

4.6 Dispute Resolution

MMSW will seek to balance the principles of access, efficiency, fairness and equitable outcomes in the design of its dispute resolution mechanisms. Dispute resolution processes are tailored to the nature of disputes as well as the likely parties to a typical dispute. The objectives of the dispute resolution process are to manage disputes towards resolution rather than adjudication, earlier and faster and at a reduced cost to all parties involved.

The following suite of alternative dispute resolution processes will be used:

Dispute Type	Path of Escalation/Resolution
Producer Members	<ul style="list-style-type: none"> • Per the dispute resolution process outlined in the Membership Agreement
Residents and Municipalities (not acting as service providers)	<ul style="list-style-type: none"> • Discussion with MMSW management • If unresolved, involvement of the Advisory Committee
Collection and Post-Collection Service Providers	<ul style="list-style-type: none"> • Discussion with MMSW management • Facilitation: to prevent escalation and to explore interests/remedies • Mediation: to be used if facilitation is unsuccessful. Process to be specified in commercial agreements regarding selection of mediator, roles of parties, time and place of mediation, conduct of mediation, length, responsibility for fees/costs, confidentiality, conclusion of mediation by agreed settlement or final settlement proposal by the mediator.

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	<ul style="list-style-type: none">• Arbitration: to be used if mediation is unsuccessful; process to be specified in commercial agreements regarding notice of arbitration, submission of written statements, place and conduct of meetings and hearings, the process for rendering and delivering decisions; jurisdiction and powers of the arbitrator, allocation of costs/fees; application of the <i>Saskatchewan Arbitration Act, 1992</i>
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The dispute resolution process described above is included on the MMSW website for transparency and will be contained in applicable service agreements for collection and post-collection service providers.

4.7 Resident Communications

MMSW will design and deliver an effective resident education program that supports achieving program targets by focusing on two primary objectives:

- Increase resident awareness of the program features and benefits; and
- Engage and encourage residents to participate in the program and make informed and correct decisions concerning the preparation and management of PPP for collection and recycling.

To achieve the above objectives, MMSW will employ the following strategies:

- **Education and awareness campaigns** – MMSW will conduct targeted awareness campaigns independently or in partnership with other parties, such as other PROs, producers, local governments and community-based organizations.
- **Collector resources** – MMSW will make resources available to collectors to be used to help educate their residents on various aspects of the MMSW program. In many instances templates will be available for customization.
- **Resident support and service** – MMSW will support residents with information about various program elements including accepted and not-accepted materials, depot locations, special projects, etc. using various channels, including email, website and social media.
- **Research** – MMSW will conduct quantitative research to gather accurate provincial information on recycling habits, service levels, brand and program awareness to help inform future education and outreach.

To ensure that residents with limited internet services have access to program information, MMSW will employ a number of strategies including phone support, event attendance, out of home advertising (e.g. transit shelters, billboards) and operations support resources (e.g. on-site signage, recycling guides, posters).

The above strategies will be phased in and adapted over time to support the transition phases outlined in this Program Plan. Communities acting as collection service providers for curbside, multi-family and/or depot collection (including municipalities, RWAs and First Nations and Métis communities) will retain primary responsibility for delivering resident communication strategies associated with the collection of PPP (e.g., accepted material list, service details, missed pick-ups, operating hours, collection schedules) in accordance with MMSW service standards.

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MMSW will align communications activities to achieve the above resident education objectives and meet program performance targets. The strategic direction and focus of these activities will primarily be informed by consumer research and program results. MMSW resident communications will be based on the following principles:

- Collaboration – MMSW will work collaboratively with relevant parties to ensure communication activities reflect the needs of service providers and partners directly engaged in resident education.
- Informed outreach – MMSW will identify and target education to meet the needs of the program. This could include targeting specific material types, demographics or geographic areas.
- Flexibility – A communication plan will be developed on a regular basis and will consider program performance and needs.

MMSW will regularly evaluate the effectiveness of the program's educational strategies and materials through the following methods:

- Consumer research – resident attitudes, beliefs, and behaviours; program awareness;
- Campaign evaluation – impressions, engagement, interactions (if applicable);
- Website and social media analytics – website: page views, users, sessions; social: impressions, link clicks, engagements; and
- Program results – recovery rate, contamination rate.

MMSW will report on its educational strategies and materials in the Promotion and Education section of its annual report.

5. Program Performance

5.1 Waste Management Hierarchy

MMSW will seek to manage PPP in accordance with the Waste Management Hierarchy, as outlined in the Ministry of Environment's Product Stewardship Program Development Guidelines:

1. Reduce – reducing the amount of material used to produce the packaging and paper product;
2. Redesign – redesigning/changing the packaging or paper product to improve recyclability;
3. Reuse – Designing/developing durable, reusable packaging alternatives;
4. Recycling – recycling is defined as household packaging and paper products collected by MMSW that are sold as a commodity for the purposes of being reprocessed into raw materials for use as inputs into new packaging or products or used as a feedstock in the composting process;
5. Recover – includes recovering material or energy from the packaging and paper products; and
6. Dispose – includes disposing of the waste from the packaging and paper product in a landfill.

MMSW will design and implement a reverse supply chain system designed to collect, process and send for recycling PPP targeted for collection. For not-accepted PPP and non-PPP incorrectly placed in recycling bins by residents, MMSW will strive to manage those materials via the highest and best use on the waste management hierarchy. Material collected by MMSW through its program will not be sent to

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waste-to-energy facilities. As outlined in Section 5.2, MMSW will report annually on the amount of material managed through recycling, composting, energy recovery and landfill.

MMSW will work to reduce the environmental impact of producer members' PPP by managing the collection, processing, and marketing of this material under the transition phases outlined in this Program Plan. This will involve partnering with collection service providers and overseeing the sale of processed material to approved end markets. The program also seeks to innovate by engaging with producers to advance the recycling of various materials and finding new ways to encourage source reduction, reuse and good recycling practices.

Plastic packaging comes in a wide range of materials and designs and is constantly evolving, which places a burden on residents, businesses and governments looking to understand which options are the most sustainable. This can hamper recycling efforts and lead to plastic packaging ending up in the landfill or the environment.

Many MMSW producer members are innovating sustainable design as part of the Canada Plastics Pact (CPP), which was launched in January 2021 and provides the opportunity for businesses across the plastics value chain to address plastic pollution in a collaborative manner. MMSW joined the CPP as an implementation partner in June 2022.

The CPP is a member of the global Ellen MacArthur Foundation Plastics Pact Network that brings together national or regional efforts to implement solutions towards a circular economy for plastics. Signatories to the CPP have committed to achieving the following targets by 2025 and will report annually on their progress:

- Support efforts towards 100% of plastic packaging being designed to be reusable, recyclable or compostable;
- Undertake actions to ensure that at least 50% of plastic packaging is effectively recycled or composted;
- Ensure an average of at least 30% (by weight) recycled content across all plastic packaging; and
- Eliminate problematic or unnecessary plastic packaging.

In early 2022, the CPP introduced the nine Golden Design Rules, which provide a clear framework to drive innovation and actions that will result in less plastic packaging overall and easier to recycle plastic packaging by 2025. The Golden Design Rules aim to change how packaging is designed to keep it in the economy and out of the environment. The rules are:

1. Increase value in PET recycling;
2. Remove problematic elements from packaging (no undetectable carbon black, no PVC or PVDC, no EPS or PS, no PETG in rigid plastic packaging, no oxo-degradable);
3. Eliminate excess headspace;
4. Reduce plastic overwraps;
5. Increase recycling value for PET thermoformed trays and other PET thermoformed packaging;
6. Increase recycling value in flexible consumer packaging;
7. Increase recycling value in rigid HDPE and PP;
8. Reduce virgin plastic use in business-to-business plastic packaging; and
9. Use on-pack recycling instructions.

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Details about the nine rules are available on the CPP [website](#).

Smart and sustainable design ensures plastic packaging is properly recycled, helps keep it out of the environment and reduces GHG emissions. These initiatives are important because improved recyclability and increased recycled content, coupled with a full extended producer responsibility program, provide a pathway to a circular economy for materials.

When producers take full responsibility for their materials, they are in a better position to recover them as inputs into new manufacturing processes and capture the maximum value from these resources. Producers are also investing in developing innovative alternatives to single-use plastics and other problematic items included in new federal and provincial regulations.

Given the small market size of Saskatchewan compared to the reach of regional, national and international producers, MMSW believes it can best influence PPP design by actively applying its time, resources and expertise to organizations and initiatives such as the CPP that are focused on national harmonization and standards. As additional Canadian provinces begin implementing full EPR programs for PPP, MMSW will work closely with these programs to build synergies and collaborate on national approaches to sustainable PPP design. By collaborating in this way, MMSW will keep informed on trends and priorities so it can consider when and if it is appropriate to introduce additional measurements into its program.

This collaboration, when combined with a provincially accepted material list clearly communicated to residents, is MMSW's best opportunity to drive both producer and consumer behaviour towards recyclable PPP types and away from PPP types not accepted in the program's collection system, such as polyvinyl chloride (PVC) packaging.

Section 5.2 below outlines the reporting metrics that MMSW will provide annually, which includes several metrics pertaining to the Waste Management Hierarchy.

5.2 Reporting Metrics

By June 30 of each year, MMSW will submit an Annual Report to the Ministry of Environment that describes the program's activities of the previous calendar year (January 1 to December 31), independently audited financial statements as well as the performance metrics outlined below. The Annual Report will be posted on the MMSW [website](#) along with Annual Reports from previous years.

The Regulation references the following categories of PPP for the purpose of reporting metrics and performance targets:

- Paper;
- Plastic;
 - Rigid plastic;
 - Flexible plastic;
 - Bio-based plastics that are;
 - Certified compostable; and
 - Not certified compostable.
- Metal;
- Glass; and

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- PPP made from any combination of the above materials.

At present, MMSW does not have the capability to report the amount of PPP supplied by producer members by certified compostable bio-based plastics and not certified compostable bio-based plastics. As the categories of PPP that producer members report to MMSW are harmonized across multiple provinces, adding additional categories is a significant undertaking requiring sufficient review and consultation with producer members. MMSW has the capability to report on the amount of compostable or bio-based plastics supplied by producer members (without the breakdown of certified compostable vs not certified compostable), which will be reported annually.

In addition, there are expected to be meaningful operational barriers to establishing collection numbers of these categories, given the difficulty in identifying the difference through composition audits of unlabelled materials at end-of-life. MMSW will engage with producer members on this issue, study what reporting of these categories will be feasible and seek to add them as PPP categories for the purposes of reporting metrics and performance targets if this is deemed achievable and practical.

MMSW will communicate a decision on the feasibility of reporting the amount of certified compostable bio-based plastics and not certified compostable bio-based plastics supplied separately, as well as a reporting timeline if applicable, by the launch date of Transition Phase 1 plus six months. This timeline will give sufficient time for the necessary engagement and consultation with producer members and associations. The feasibility of reporting on the collected quantities of these categories (as will be required to calculate metrics such as diversion rates) will be studied during Transition Phase 3 Implementation when all materials that will be targeted as accepted PPP are collected under the program, including Flexible Plastics.

Until such a time as both supply and collection numbers for these categories are available, references to reporting metrics and performance targets by PPP category will include the following PPP categories:

- Paper;
- Plastic;
 - Rigid plastic;
 - Flexible plastic;
- Metal; and
- Glass

The following table outlines the reporting metrics that will be included in each year’s Annual Report, beginning in the reporting year that includes the commencement of Transition Phase 1 Implementation, including an indication of whether each metric will be reported for the overall program and/or by each applicable PPP category.

Reporting Metric	Reporting Applicability	
	Overall Program	By PPP Category
Amount supplied by producer members	✓	✓
Amount supplied by producer members of compostable plastics and PVC packaging (combined with other plastics in the applicable reporting categories, as applicable)	✓	N/A

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Amount collected by the program	✓	✓
Amount managed through recycling ⁴ or composting	✓	✓
Amount managed through energy recovery	✓	✓
Amount disposed of in a landfill	✓	✓
Collection rate - the total amount of PPP collected and sent to a sorting facility for diversion from landfills, expressed as a percentage of PPP supplied to the market by producer members	✓	✓
Diversion rate - the total amount of PPP diverted from landfills, calculated as the sum of PPP recycled and recovered for energy and expressed as a percentage of PPP supplied to the market by producer members	✓	✓
Recycling rate – the total amount of PPP recycled by the program, expressed as a percentage of PPP supplied to the market by producer members	✓	✓
Location of the program’s collection services by service type and any changes from previous annual report, including the number of transitioned and non-transitioned communities per transition phase	✓	N/A
Number of households served by curbside and multi-family service	✓	N/A
Total program greenhouse gas (GHG) emissions associated with supply chain operations and any initiatives taken to reduce GHG emissions	✓	N/A
Level of public awareness of the availability and functioning of the program	✓	N/A
Descriptions of public awareness, communication and education campaigns	✓	N/A
Comparison of the program’s performance to the performance targets outlined in Section 5.3	✓	As applicable
A description of how MMSW collaborated with producer members to influence packaging design and choices, including through national organizations and initiatives	✓	N/A
A description of any applicable initiatives or strategies targeting unmarketable or underperforming material types	✓	N/A
Total program cost per tonne, total program cost per household	✓	N/A
<i>Independently audited financial statements including:</i>	✓	N/A
Fee rates charged to producer members, including an explanation of any significant changes	N/A	✓
Total amount of fees collected from producer members to fund the program	✓	N/A
The amount spent to operate the program in Saskatchewan	✓	N/A
The amount of recycling incentives paid out, if any	✓	N/A
The costs incurred to administer the program	✓	N/A
The amount spent on public education or public awareness and	✓	N/A

⁴ In accordance with the Regulation, “recycle” means PPP collected by the program that is sold as a commodity for the purposes of being reprocessed into raw materials for use as inputs into new packaging or products or as feedstock in the composting process.

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During the transition implementation phases, reported metrics will include a combination of PPP managed by MMSW collectors participating in the shared responsibility model as well as PPP managed under each transition implementation phase applicable to that reporting year. As end-of-life data is only provided by the largest collectors participating in the MMSW program under the shared responsibility model, not all reporting metrics may be available each reporting period during the transition phases, depending on the staging of community transitions.

To support the provision of accurate reporting metrics, MMSW will ensure the complete chain of custody of the material managed under each transition implementation phase by recording and tracking the material from the point it is received from a collector up until its shipment to an approved end market. A system of field inspections and audits to oversee the work completed by collection and post-collection service providers will be developed to ensure compliance with all relevant policies and procedures.

To ensure the accuracy of the reported supply of PPP, MMSW conducts a detailed report validation process on producer members' submitted PPP supply reports.

MMSW's approach to the reporting of GHG emissions will align with the Ministry's Greenhouse Gas Measurement and Management Guidelines.

5.3 Performance Targets

MMSW will seek to achieve four primary performance targets, as outlined in the Regulation:

- Overall program recycling rate;
- Overall program diversion rate;
- Recycling rate by PPP category; and
- Diversion rate by PPP category.

The definitions of recycling rate and diversion rate will follow those outlined in Section 5.2.

Historic figures for the most comparable metrics provided in MMSW's Annual Reports are illustrated below for reference and context.

5.3.1 Historic Program Collection Rates

The following table illustrates the historic collection rates of the MMSW program, as reported in the program's Annual Reports. Collection rate, as used here, is defined as the total amount of PPP collected by municipalities participating in the MMSW program as a percentage of total PPP supplied by MMSW producer members.

Year	Program Collection Rate
2016	70.0%
2017	72.8%

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2018	70.1%
2019	77.4%
2020	76.5%
2021	77.4%
2022	68.6%

5.3.2 Historic Program Recycling Rates

The following table illustrates the historic recycling rates of the MMSW program, using information included in the program’s Annual Reports. Recycling Rate, as used here, is defined as the total amount of PPP shipped to recycling end markets by municipalities participating in the MMSW program as a percentage of total PPP supplied by MMSW producer members. Reporting of the amount of PPP shipped to recycling end markets began by MMSW in the 2020 reporting period.

Year	Program Recycling Rate
2020	52%
2021	53%
2022	58%

5.3.3 Historic PPP Category Recycling Rates

The following table illustrates the historic recycling rates of the MMSW program by PPP category, as reported in the program’s Annual Reports. Recycling Rate, as used here, is defined as the total amount of PPP shipped to recycling end markets by municipalities participating in the MMSW program by PPP category as a percentage of the total of that category of PPP supplied by MMSW producer members. Reporting of the amount of PPP shipped to recycling end markets began by MMSW in the 2020 reporting period based on end-of-life data provided by the program’s largest collectors.

Year	Paper Packaging Recycling Rate	Plastic Packaging Recycling Rate	Glass Packaging Recycling Rate	Steel, Metal and Aluminum Recycling Rate	Printed Paper Recycling Rate
2020	60%	11%	1%	35%	98%
2021	56%	9%	1%	40%	98%
2022	61%	12%	1%	40%	98%

5.3.4 Transition Performance Targets

During the transition phases outlined in the Program Plan, MMSW will seek to maintain an overall program collection rate of 72.5%, defined as the total amount of PPP collected by the program (the sum of PPP managed by MMSW collectors participating in the shared responsibility model and PPP collected under each transition implementation phase applicable to that reporting year) as a percentage of total PPP supplied by MMSW producer members.

During the transition phases outlined in the Program Plan, MMSW will also seek to achieve an overall program recycling rate of 55%, defined as the total amount of PPP recycled by the program (the sum of PPP recycled by MMSW collectors participating in the shared responsibility model and PPP recycled

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under each transition implementation phase applicable to that reporting year) as a percentage of total PPP supplied by MMSW producer members. Note that for non-transitioned communities, information on recycling end markets is only reported by the largest collectors. MMSW will also seek to achieve an overall resident awareness rate of 90% or greater for a PPP recycling program, which will be measured every two years using a resident survey.

MMSW is committed to establishing and achieving ambitious but achievable performance targets, with the goal of continuous improvement as it assumes management responsibility for materials collected in transitioned communities. Prior to the provision of updated targets, MMSW must complete each of the many steps associated with each transition phase. Given the uncertainty around the internal decision-making processes of third parties associated with the transition phases, including potential collection and post-collection service providers, program stabilization must first be established before meaningful performance targets can be proposed.

Upon the completion of Transition Phase 3, defined as 12 months following commencement of Transition Phase 3 Implementation, MMSW will propose updated targets for the following metrics (as defined in Section 5.2):

- Overall program recycling rate;
- Overall program diversion rate;
- Recycling rate by PPP category; and
- Diversion rate by PPP category.

With the goal of continuous improvement, MMSW will propose targets that will increase over time. MMSW will conduct consultation on the proposed targets and target schedule prior to submission to the Ministry of Environment. This consultation will be informed by the collection and post-collection system developed over the transition phases and the capabilities it will bring to improve the environmental performance of the program.