



Multi-Material Stewardship Western

**Consultation – Draft Program Plan for Household
Packaging and Paper Stewardship in Saskatchewan**



What We Heard Report

September 8, 2023

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Introduction

Consultation Purpose and Objectives

Why We Consulted

On March 31, 2023, the Saskatchewan Ministry of Environment released updated Household Packaging and Paper Stewardship Program Regulations, 2023 requiring a transition to a full Extended Producer Responsibility (EPR) model whereby producers assume operational and financial responsibility for collecting and recycling packaging and paper products in Saskatchewan. Under the Regulations, producers must prepare and submit a Program Plan, fully consulted on with stakeholders by September 27, 2023.

In June 2023, Multi-Material Stewardship Western (MMSW) provided its draft Household Packaging and Paper Stewardship Program Plan (“Program Plan”) for stakeholder feedback. The draft Program Plan developed by MMSW and Circular Materials outlines how producers, through the producer responsibility organization MMSW, will transition, administer, implement and fund a new collection and recycling program that is environmentally responsible, province-wide, convenient, consistent, efficient and effective.

The scope of required consultation on the draft Program Plan is described by the Ministry of Environment in The Product Stewardship Program Guidelines as engagement “...with those who are expected to implement the program, bear the cost of implementing the program and are impacted by the program, including producers, municipalities, First Nations, regional waste management authorities, service delivery agencies, end-of-life material management agencies, and any other relevant external agencies and the public” (Ministry of Environment, 2023).

Consultation Objective

The purpose of Program Plan consultation is to obtain feedback on the draft Program Plan and make changes to the final Program Plan reflecting the needs of stakeholders. Through consultation, MMSW involved stakeholders to understand how changing fees, roles and responsibilities affect recycling and waste management in Saskatchewan communities, companies and organizations by considering the question: *What Program Plan features will have the greatest positive impact on the management of Household Paper and Packaging in Saskatchewan?*

The consultation process aimed to engage with those who are affected by the Program Plan by:

- Listening to and acknowledging expressed aspirations and concerns.
- Working directly with stakeholders to obtain feedback on program details and rationale.
- Keeping stakeholders informed, including providing feedback on how their input influenced the final Program Plan and MMSW policies.
- Making intentional effort to engage those who may not normally participate due to barriers (perceived or physical).

How We Consulted

The short timeframe (six months) for crafting a draft Program Plan, planning and implementing consultation, and incorporating feedback into a final Program Plan confined consultation activities to the period between June 13 and August 13, 2023.

Consultation activities offered multiple phases and a variety of engagement opportunities.

Engaging Partners

Beginning on June 13, MMSW informed stakeholders about the purpose and nature of the consultation. An email inviting stakeholders to participate in, and help promote, consultation activities was distributed to:

- 10 members of the MMSW Advisory Committee
- 1,199 producer members
- 12 producer associations
- 16 regional waste authorities
- 16 waste companies
- 10 stewardship organizations
- 5 environmental nonprofit organizations
- 4 social enterprises
- 71 First Nation and Métis communities
- 592 local governments

Content suitable for inclusion in e-blasts and on websites was provided to 11 organizations (see Appendix A).

- Association of Regional Waste Management Authorities of Saskatchewan Inc.
- Canada Beverage Association
- Food, Health & Consumer Products of Canada
- Circular Materials (for inclusion in the MMSW steward newsletter)
- Recycle Saskatchewan
- Restaurants Canada
- Retail Council of Canada
- Saskatchewan Association of Rural Municipalities
- Saskatchewan Urban Municipalities Association
- Saskatchewan Waste Reduction Council
- Solid Waste Association of North America – Northern Lights

Building Awareness

A [consultation webpage](#) was established on the MMSW website to act as an information repository to support and promote engagement. Purchased ads and social media posts augmented efforts by partners to build awareness of the purpose, nature and timing of consultation. These ads extended the reach of the consultation program to the general public. Appendix A contains materials used to promote engagement including:

- News post on the MMSW website
- Newsletter content
- Print and digital advertisements
- Social Media posts

Advertisement / Platform	Run Date	Public Reach
Saskatoon Star Phoenix	June 24	65,000 households
Regina Leader Post	June 24	34,050 households
Prince Albert Daily Herald Rural Roots	June 29	27,525 households
Moose Jaw Express	June 28	22,000 households
The Northern Advocate	July 12	13,710 households
Swift Current Southwest Booster	June 28	13,700 households
Battleford News Optimist	June 22	13,000 households
Estevan Mercury	June 28	6,500 households
Prince Albert Daily Herald	June 24	5,685 households
Weyburn Review	June 28	4,200 households
Yorkton This Week	June 28	2,300 households
Humboldt Journal	Online July 5 to Aug 4	14,500 impressions
<u>Multi-Material SW – MMSW Twitter</u>	Digital	248 followers
<u>Saskatchewan Recycles – MMSW Facebook</u>	Digital	214 followers

In-Person Sessions

In-person sessions, open to the public, enabled participants to learn details and supporting rationale for the design of the draft Program Plan. In addition to providing opportunities for participant questions and comments, these sessions also included small group engagement activities to solicit feedback related to transition impact and keys to success, both during transition and once the future program is fully established. These insights help MMSW answer the consultation question: *What Program Plan features will have the greatest positive impact on the management of Household Paper and Packaging in Saskatchewan?*

Sessions were held in Regina (June 27, 1:30 p.m. to 4:00 p.m. CST) and Saskatoon (June 28, 1:30 p.m. to 4:00 p.m. CST).

Session agendas are provided in Appendix B. Slide presentations from these sessions are available on the [consultation webpage](#).

MMSW Advisory Committee Meeting

A special meeting to collect feedback from the Advisory Committee at their hybrid (i.e., in person attendees joined by others online) was held on June 28, 2023 in Saskatoon. The current membership of the Committee is available on the [MMSW website](#).

Virtual Sessions

Virtual sessions offered participants convenience, affordability and time efficiency. Four sessions were held:

- Producers and Producer Associations (July 4, 2023, 10:30 a.m. to 12:00 p.m. CST)
- Local Governments and Communities (July 5, 10:00 a.m. to 11:30 a.m. CST)
- Waste Management Companies (July 5, 1:30 p.m. to 3:00 p.m. CST)
- All Stakeholder Groups (July 10, 2023, 1:30 p.m. to 3:00 p.m. CST)

These sessions provided an opportunity for participants to dialogue with the MMSW team, asking questions and providing comments. An engagement activity also solicited feedback on the consultation question with a focus on keys to success, both during transition and once the future program is fully established.

The agenda used for virtual sessions is provided in Appendix B. Session recordings and presentation slides from these sessions are available on the [consultation webpage](#).

Indigenous and Northern Engagement

Urban, rural, northern, First Nation and Métis communities were encouraged to participate at the in-person sessions and/or the two most relevant virtual sessions, the July 5 session dedicated to local governments and communities and July 10 session open to all.

The draft Program Plan anticipates additional and dedicated consultation with First Nation and Métis communities and organizations, including identifying an appropriate consultation process and associated timelines, as part of the transition process (specifically, in Transition Phase 2).

As an initial engagement through this consultation program, MMSW met with the Saskatchewan Aboriginal Lands Technicians (SALT) on June 22 to begin the gathering of information on how to develop a successful process for providing information and consultation opportunities for First Nation and Métis communities and organizations in the future. The meeting enabled members of SALT to ask questions and obtain learnings from the Recycle BC First Nations Recycling Initiative where similar engagement is ongoing related to providing recycling in First Nations communities.

Maintaining Accessibility

Consultation activities provided multiple avenues for participation, enabling affected communities, companies and organizations the opportunity to select an option suitable to their needs. Accessibility and choice were addressed in the following ways:

Variety of feedback channels

- In-person options were provided in the two major cities.
- Virtual sessions utilized to provide options to those unable to travel.
- MMSW team responded to requests to meet one-on-one with organizations.
- Email and telephone outreach occurred by local MMSW staff.
- Email / letter submissions were encouraged.

Use of technology to remove barriers (perceived or real)

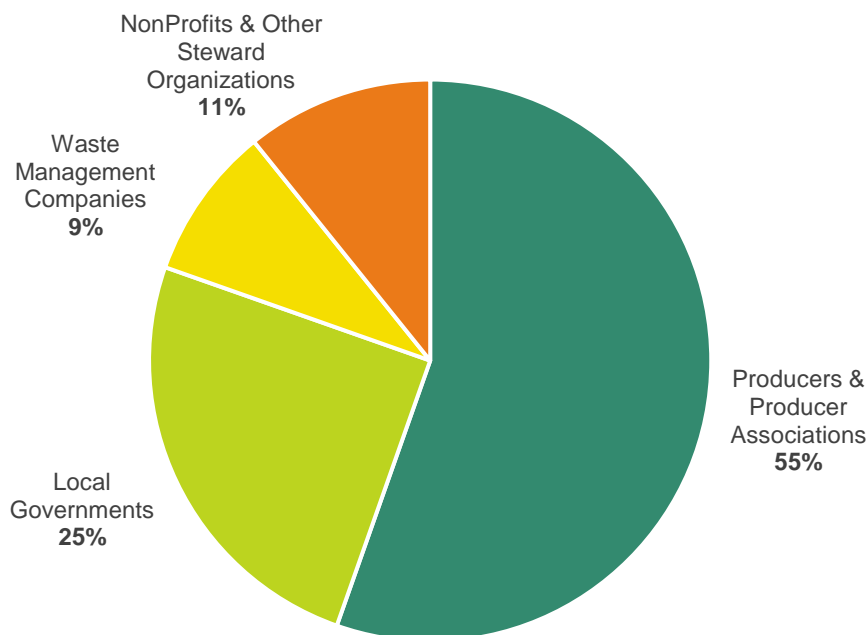
- Providing a central information repository on the consultation webpage for participants and other interested individuals who may not have been able to participate directly.
- Use of virtual meeting platform to reduce geographic barriers and time commitment required to participate.
- Providing access to multi-media recordings and presentation files enabling participants to review at their own pace and time.
- Text (web and presentations) and documents considered accessibility and use of assistive technology.
- Facilitators / recorders provided at all sessions to reduce need for people to type, write or speak (as the case may require).

Phased engagement to allow time for thinking / reacting / responding

- Draft Program Plan was posted two weeks prior to the first scheduled session.
- Sessions provided a first-round opportunity for information sharing and feedback.
- A Consultation Engagement Insights report (see Appendix C) and detailed list of common Questions and Answers provided timely feedback on what input was received through sessions and how participant input related to the draft Program Plan.
- A final call for submissions based on the Insights report was issued well in advance of the deadline to respond.

Who Participated

The organizational profile of participants is shown in the pie chart below.



Participant Satisfaction with Engagement

To help understand whether Program Plan consultation activities were satisfactory to Saskatchewan communities, companies and organizations, participants were polled on the information provided, the opportunity to engage, and whether the draft Program Plan content was suitable to their needs.

- Exit survey responses suggest consultation events provided information useful to participant needs. 92% identified that the information either fully met their needs (48%) or they were satisfied with opportunities available for further follow-up (44%).
- Participants at in-person events unanimously identified the consultation sessions as meaningful and fun. Strongly positive results were also provided at virtual events.
- Expressed opinions on satisfaction with the Program Plan content revealed 11% excitement, 45% comfort and 37% undecided. 5% of participants indicated they had concerns they would be further discussing with MMSW after the engagement event.

Feedback Received

What We Heard

Questions

The following is a summary of common questions received during the consultation period on the draft Program Plan, including in-person and virtual sessions. Questions and answers have been combined (to the 40 questions listed below from an initial list of 125 questions received) and paraphrased for brevity and clarity.

General	
<p>What is the difference between collection rate, recycling rate and diversion rate?</p>	<p>These terms are defined in Section 5.2 Reporting Metrics in the draft Program Plan.</p> <p>The collection rate is defined as 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.</p> <p>The recycling rate is the total amount of PPP recycled (PPP collected by a product stewardship program 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 as feedstock in the composting process) by the program, expressed as a percentage of PPP supplied to the market by producer members.</p> <p>The diversion rate is 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.</p>
National Integration	
<p>How are MMSW and Circular Materials working together? Who will be the Producer Responsibility Organization (PRO) moving forward?</p>	<p>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. MMSW and Circular Materials worked together to develop the draft Program Plan and are working together on the consultation process to gather feedback on the draft Program Plan.</p>

<p>Could another organization other than MMSW submit a Program Plan to act as the producer responsibility organization (PRO) for household packaging and paper products (PPP)?</p>	<p>MMSW and Circular Materials are working together on the draft Program Plan and a single Program Plan will be submitted. Another organization could submit a Program Plan, however, MMSW is not aware of efforts by another organization to prepare a fully consulted Program Plan for submission to the Saskatchewan Ministry of Environment by September 27, 2023, as required by the Household Packaging and Paper Stewardship Program Regulations, 2023.</p>
<p>Transition Phases and Timelines</p>	
<p>Why will the transition roll out in three phases? Why can't it all happen at once? It doesn't seem fair that smaller and rural communities must wait until Phase 2 or 3.</p>	<p>There are several parallel and sequential activities that must occur to develop the collection and post-collection systems required to support each transition phase. The timeline set out for the implementation of Transition Phase 1 (6 months) is not sufficient to complete all the activities necessary to transition the entire province of SK. At the same time, we do not want to delay the implementation of a portion of the province until all activities have been completed. We are proposing a phased approach to transition to ensure sufficient time for MMSW and all stakeholders to prepare for the coming changes.</p>
<p>Which transition phase will my community be in? When will you confirm who is included in each phase?</p>	<p>Transition Phase 1 will target logical post-collection flows from one or more clusters of large communities with existing curbside and multi-family PPP programs currently participating in the MMSW program. We will aim to provide formal notice to those communities targeted in this phase as soon as possible after Program Plan approval.</p> <p>Transition Phase 2 will focus on curbside and multi-family collection in smaller communities not targeted in Transition Phase 1, including remote, northern and First Nations and Métis communities. Community eligibility will be determined through the development of Community Curbside and Multi-family Collection Eligibility Criteria, which will include stakeholder consultation.</p> <p>Transition Phase 3 will focus on depot collection. Eligible communities will be determined through the development of Depot Collection Eligibility Criteria, which will include stakeholder consultation.</p>
<p>Does Phase 2 begin one year after the launch or completion of Phase 1?</p>	<p>Phase 2 is intended to start one year after the launch of Phase 1. Phase 3 is intended to start one year after the launch of Phase 2.</p>
<p>In cases where MMSW will be procuring services directly, is it bound by government procurement policies?</p>	<p>MMSW is a non-profit organization. It undertakes best practice approaches to fair procurement but has flexibility to design processes that work best for the program.</p>
<p>How will MMSW monitor the implementation of the Program Plan?</p>	<p>Field services team members will monitor the performance and engage directly with collection and post-collection service providers.</p>

Collection	
<p>Can a municipality be a Collector? Will MMSW provide collection services directly moving forward?</p>	<p>Large communities with existing curbside and multi-family PPP programs currently participating in the MMSW program that are targeted in Transition Phase 1 will have the opportunity to consider an offer to participate as a collection service provider. Given the timelines associated with the transition and the activities outlined in the draft Program Plan that must first be completed, MMSW is not proposing to provide collection services directly as part of Transition Phase 1.</p> <p>Under Transition Phase 2, MMSW will develop an approach to procuring collection services in smaller communities that will establish scenarios where:</p> <ul style="list-style-type: none"> • Directly contracting private waste companies servicing multiple communities along a collection route can achieve improved administrative, operational, and environmental efficiencies; and • Offers will be extended to municipalities, RWAs, First Nations and Métis communities who wish to maintain operational oversight of curbside and multi-family collection service, where warranted. <p>Under Transition Phase 3, MMSW will complete an assessment, including stakeholder consultation, on whether providing the option for communities included or eligible under Transition Phase 1 to transition to having MMSW provide curbside and/or multi-family collection directly through a competitive procurement process will provide additional system optimization or efficiencies.</p>
<p>How much time will communities have to review and consider an offer and collection agreements? What will the deadlines look like? Will communities be required to transition on a specific timeline if they accept an offer?</p>	<p>MMSW will aim to provide communities as much time as possible to consider an offer, including applicable collection agreements and incentive rates. We invite feedback on what timelines would be required for communities to complete their review and decision-making process once an offer has been provided.</p> <p>Deadlines and a proposed implementation timeline will be provided with associated offers to ensure MMSW can plan for the post-collection, reporting systems and program management systems required to support the transition of applicable communities.</p>
<p>If our community contracts a private company to provide collection services, what do we do about our current contracts?</p>	<p>MMSW will continue to compile information from MMSW collectors which will impact the timing of their possible participation in transition phases, including current contractual arrangements with existing service providers. In many cases, it is expected that communities would be able to accept an offer and sign a new collection agreement with MMSW under a transition phase midway through the term of a service provider contract if there is a mechanism to adjust contract terms.</p>

<p>What are the policies and procedures referenced in the draft Program Plan for curbside and multi-family collection?</p>	<p>Curbside and multi-family collection policies and procedures will be developed during the design phase of Transition Phases 1 and 2. Many of these procedures will represent current best practices, and will include procedures such as minimum collection frequency, provision of collection containers, receiving facility logistics and reporting requirements.</p>
<p>Our community has a combination of collection services (e.g., curbside and depot). Will both be addressed in a single Transition Phase?</p>	<p>Depot collection is intended to be captured under Transition Phase 3. If a local government accepts an offer from MMSW to act as a curbside or multi-family collection service provider under either Transition Phase 1 or 2 and the local government currently has an agreement with MMSW that covers multiple collection types (e.g., curbside and depot collection), that agreement will be amended to permit depot collection to continue under the shared responsibility model until Transition Phase 3.</p>
<p>If a community has curbside collection but is only eligible for depot service, or if a community is eligible for curbside service but prefers depots, what happens under the Program Plan?</p>	<p>Curbside and multi-family eligibility criteria for communities will be established as part of Transition Phase 2 and depot eligibility criteria will be established as part of Transition Phase 3, both of which will include a dedicated consultation process.</p>
<p>What will the target contamination rate be? Will there be penalties or fines for high rates of contamination?</p>	<p>Certain types of contamination can present significant health and safety issues for both collection and post-collection staff. The presence of contamination in collected materials can also reduce the ability to effectively recycle material or meet the requirements of recycling markets.</p> <p>A target contamination rate will be established under collection policies and procedures as well as collection agreements associated with each transition phase. This rate will be designed to be fair and achievable through the application of best practices. If contamination rates continue to be high after significant collaborative effort by MMSW to work with the Collector, the financial consequences outlined in the agreement may be applied as a last resort.</p>
<p>What are the policies and procedures referenced in the draft Program Plan for depot collection? Will depots be required to be staffed and secured?</p>	<p>Depot collection policies and procedures will be developed during the design phase of Transition Phase 3 to ensure sufficient quality of collected material from depot locations.</p>

<p>The intent is to cover the entire province with recycling. For areas that do not currently have services, will MMSW set up a program?</p>	<p>Curbside and multi-family eligibility criteria for rural communities will be established as part of Transition Phase 2 and depot eligibility criteria will be established as part of Transition Phase 3. This will include dedicated consultation to understand how best to design these new systems to ensure they are fair and reasonable for the producers who are paying for them while also effective for residents to access. Not everyone will have a curbside service and not every community will have a depot, but the intent is to provide reasonable collection services to all regions of the province.</p>
<p>What happens to existing recycling carts if MMSW takes over collections?</p>	<p>There is opportunity to leverage resources already deployed within the supply chain, as there are potential environmental and cost impacts that could be avoided by retaining existing carts. What to do with existing carts specifically will be determined following investigation and discussion with relevant stakeholders as part of the design phase of each Transition Phase.</p>
<p>Will regional service approaches be considered?</p>	<p>MMSW will be procuring post-collection services and then determine catchment areas and existing agreements within those areas. Agreements with Regional Waste Authorities already consider regional approaches and this can continue under the Program Plan.</p>
<p>How will MMSW address existing curbside subscription services offered to farms today?</p>	<p>MMSW will investigate and determine curbside eligibility criteria for rural areas through the criteria-setting process in outlined in Transition Phase 2.</p>
<p>Collection Incentives</p>	
<p>With a shift from 75% to 100% funding, what happens to program fees paid through incentives?</p>	<p>As MMSW last conducted a cost study in 2022, the 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 Phase 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. It is therefore difficult to predict at this time what the incentive rates might look like.</p> <p>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 as well as to assess the curbside and multi-family incentives applied in Transition Phases 1 and 2 in the current market context.</p>

Post Collection	
Who will be responsible for post-collection services? What role will local governments play in processing? If our municipality has an existing contract for post-collection services, what happens to these?	<p>Moving forward, MMSW will be responsible for all aspects of post collection, including receiving, processing and marketing PPP collected under the transition phases outlined. 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.</p> <p>MMSW will continue to compile information from MMSW collectors which will impact the timing of their possible participation in transition phases, including current contractual arrangements with existing service providers. In many cases, it is expected that communities would be able to accept an offer and sign a new collection agreement with MMSW under a transition phase midway through the term of a service provider contract if there is a mechanism to adjust contract terms.</p>
Collection routes are currently designed in consideration of the location of post-collection facilities. What impacts will transition have on routes?	Any agreement offer (whether directly to a private waste company or to a municipality) will either provide the location of the post-collection facility or language describing distance parameters (e.g., within a certain distance of the service area).
How will you consider existing facilities and infrastructure currently operating in the province?	As noted in the draft Program Plan, Transition Phase 1 Design will include a market sounding exercise with 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 can be considered. Social enterprise organizations that provide recycling services in SK will be included in this process. This will include one-on-one meetings with applicable companies and organizations over the coming months. MMSW will be reaching out to companies and organizations directly, but if you are interested in participating in this process, please let MMSW know.
Accepted Materials	
What materials will be accepted for collection? Why is the list not yet available?	MMSW will work to expand and harmonize the list of accepted materials across all applicable collectors concurrent with the implementation of each transition phase. A detailed accepted material list will be developed during the design phase of each of the transition phases. 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.
There are currently inconsistencies with what items municipalities accept. How will items within the program be harmonized across Saskatchewan?	Ensuring appropriate post-collection capacity to handle each material is critical prior to adding a material into the program. MMSW will procure these services prior to implementing a Transition Phase. Once the transition process has been completed, consistent messaging about accepted materials will occur on a provincial basis.

<p>Will there be a policy or messaging for products that can go in both the blue (recycling) and green (organics) carts? This can be confusing.</p>	<p>MMSW will be developing extensive resident-facing education materials and will make messaging clear on this point. While MMSW is managing resident communications for packaging and paper material, it will be collaborating with municipalities to streamline and manage resident communication on other material streams.</p>
<p>SARCAN accepts glass today and some municipalities include glass in their program. Will glass have to be removed from programs in Phase 1?</p>	<p>Under the draft Program Plan being consulted on, glass is envisioned to be addressed as part of Phase 3. MMSW welcomes input on this issue. The intention is to not accept glass mixed with other materials in curbside programs under the transition. *Note the change to the Program Plan post-consultation to include glass as a targeted material in Phases 1 and 2.</p>
<p>In the news there are stories about materials that don't make it to market and are landfilled or dumped. What will MMSW do to ensure this does not occur?</p>	<p>MMSW will regularly conduct due diligence on end markets it approves for its material to ensure the material is recycled and managed in a responsible manner. MMSW will also ensure the complete chain of custody of the material managed under each transition phase by recording and tracking the material from the point it is received from a collector 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.</p>
<p>How will MMSW use the waste management hierarchy to make decisions about how to manage collected materials?</p>	<p>MMSW will seek to manage collected material as high on the waste management hierarchy as possible. Upon completion of Transition Phase 3, MMSW will be establishing and consulting on proposed performance targets, which will include recycling rate and diversion rate targets for the program.</p>
<p>What is the anticipated timeline for discussing and deciding what to do with 'bio-plastics'?</p>	<p>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. In addition, there are expected to be meaningful operational barriers to establishing collection numbers for 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. *Note the change to the Program Plan post-consultation to add a timeline associated with this issue.</p>

Resident Communications	
Who will be responsible for providing resident education?	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). MMSW will employ a number of province-wide strategies, including education and awareness campaigns, the development of collector resources, high-level resident support services and research.
If there are resident complaints about changes to recycling, they always contact the municipality (and often, a councillor). What will MMSW do in this instance?	MMSW will develop detailed collector resources for any municipalities acting as collection service providers under the MMSW program. Messaging support will be provided to assist in the handling of resident complaints.
Who is responsible for bylaw enforcement if residents are not following program policies and procedures?	Expectations for bylaw enforcement and resident education / awareness to address collection and contamination related issues will be included in the offer made to municipalities by MMSW. In general, bylaw enforcement is outside the scope of MMSW's mandate.
Producer Fees and Agreements	
Will producers have to enter into a new membership agreement?	While no major changes are anticipated, some revisions to the membership agreement may be necessary; however, producers will not need to sign a new membership agreement. MMSW will proactively reach out to producers with changes to existing agreements as may be necessary.
Will producers have to register with a new regulator?	Obligated producers will need to be a member of a PRO with an approved program plan. There is no requirement under the Regulation to register with the province or with a regulatory body, as exists in some other provinces.
How will producer fees be determined? What will be the impact of the transition on producer fee rates? When will updated producer fee rates be provided to producer members?	Section 2.3 Program Financing provides details on the methodology of how producer fees are established. The fee rates for a given year will reflect the estimated costs of all program elements for that year, including the applicable transition phases. MMSW completes its budgeting process in the summer of each year and provides the fee rates to producer members in October for the coming calendar year.
How does the \$1 million exemption threshold outlined in the Regulation apply?	Producers are exempted under the Regulation if they generate less than \$1 million in gross annual revenue.

<p>Will this program require Stewards to gradually phase in the use of recycle-friendly packaging to remain compliant? Will there be fines and penalties for not doing so?</p>	<p>As per the regulation, Annual Reporting 11(3)(h), MMSW is to include in its annual report to the ministry “...efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle;”</p> <p>The regulation does not provide measurements, nor set targets for ‘reusability’ or ‘recyclability’ and does not set out any schedule, fines or penalties. As such, these are not included in the draft Program Plan.</p>
<p>Who is considered the producer when a company, resident in Canada, sells through a third-party marketplace distributor?</p>	<p>As per the regulation, the producer obligation hierarchy is as follows:</p> <ul style="list-style-type: none"> (a) If a business or organization supplies packaging to consumers in Saskatchewan and is the brand owner resident in Canada, that business is the obligated producer as the brand holder. (b) If a business or organization is resident in Saskatchewan and imports packaging for which there is no brand holder resident in Canada, that business is the obligated producer as the importer. (c) If these two situations do not apply, then the obligated producer is the retailer. <p>However, if the producer determined in accordance with the above 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.</p>

Perspectives

Saskatchewan communities, companies and organizations expected to be affected by the Program Plan were consulted to learn what features may have the greatest positive impact on the management of Household Paper and Packaging in the province. Perspectives to describe the impact of a transition from partial to full EPR were gathered to help understand keys to optimizing for benefits while also reducing risk of unfavourable outcomes. The following profiles use feedback provided through an exercise at in-person sessions and were subsequently tested using questions and feedback from virtual sessions and written submissions.

Producers

Producers, particularly those in industries with low profitability margins, are sensitive to costs. The potential for reputation damage and even loss of customers limit the scope for raising consumer prices to cover increased costs associated with regulatory compliance. Producers seek simple, cost-efficient program design and administration. Many are also interested in access to program materials. The ability for members to play an active governance role is viewed as important to ensuring transparency and program effectiveness. Important competitiveness issues can be addressed through the fair application of fees across regulated industries; and harmonizing rules, accepted materials and reporting across jurisdictions.

Communities

Communities are (directly or indirectly through contractors) front-line waste service providers to residents today. A more active role in recycling by producers is welcomed and expectations are high that such involvement will lead to reduced cost and administrative burden for local governments. Province-wide universality of rules and messaging is identified as important to ensuring strong participation by residents and effective recycling (with low levels of contamination or loss to other waste streams). Changing the relationship for managing different waste streams creates significant complexity as communities have sought efficiencies and effectiveness by optimizing across recycling, organic and disposal programs through investment. A focus on regional approaches and/or social impact have also played a role for many communities.

Existing Waste Management Organizations

Company size is deemed to play a significant role in the perspective of waste management organizations; larger companies and those serving large regions today identify optimism while smaller companies and social enterprises are worried about future opportunities. Social enterprises, in particular, are concerned that cost-efficiency may have a narrow definition in the future (i.e., social inclusion goals deemed out-of-scope). Some optimism exists for the potential for new processing capacity and new markets to be established in Saskatchewan as a result of the new program.

Residents

Benefits accruing to residents are expected to result from the transition to a full EPR program. These include: the potential for lower recycling fees; improved consistency and awareness of what to recycle due to consistency in Saskatchewan (and stronger consistency across the western Canada); the ability to recycle more materials; and additional access to recycling as new communities are brought onboard. Avoiding disruption is important to residents and may be caused by reductions in the level of service convenience or confusion related to the phasing of accepted materials during the transition.

Feedback Themes

During consultation activities, participants were encouraged to identify keys to success as Saskatchewan transitions to a new EPR recycling program. Other feedback was also welcome. Further, written submissions were encouraged. In total, 332 feedback comments were received during 6 sessions and from 11 written submissions. The following is a summary of common themes from these comments, combined and paraphrased for brevity and clarity.

Communications

Overarching theme to feedback: It is important to communicate with all stakeholders through all phases of transition as well as commit to ongoing communications to optimize recycling in Saskatchewan.

Consultation participants seek continued dialogue, and sufficient time and resources to be provided to enable meaningful dialogue to occur. Common sentiments from comments received include:

- Communicate transition details in simple form and with timelines.
- Seek Program Plan approval in phases to ensure adequate details are provided following consultations on each successive transition phase.
- Work with First Nation and Métis communities and organizations on an appropriate process and timeline for consultation on their involvement in recycling opportunities.
- Continue to provide education funding and materials to communities as well as direct support for program awareness.
- Provide education materials for producers to support their stewardship and consumer education.

A number of comments also sought specific information from future communications, such as:

- Provide an improved definition for packaging-like products.
- Post the fee-setting model on the website to improve transparency to producers who pay fees.

Focus on Environmental and Financial Benefits

Overarching theme to feedback: Maintain a focus on environmental and financial benefits, particularly when communicating.

Consultation participants expect change to be undertaken for improved results, not to maintain the status quo. With many sectors and stakeholders involved in the change, communicating benefits helps motivate positive action. Comments describe specific benefits desired as well as pathways to achieving these benefits.

- Encourage packaging innovations to increase reusability, recyclability and reduce 'overpackaging.'
- Restate the waste management hierarchy to align to the Guidelines produced by the Ministry of Environment.
- Establish a more complete set of initial 'pilot' or 'dry-run' performance targets in the Program Plan to motivate higher rates of recycling.
- Give priority to enabling producers access to program materials.
- To demonstrate environmental effectiveness and cost efficiency, provide a description of the process for designing recycling from a provincial perspective (e.g., relationship between processing procurement and collections).

- Apply fees to all obligated producers and all obligated materials in all phases of the Plan. Fees incentivizing change are helpful inside organizations (e.g., using Canada Plastics Pact and other best practices).
- Update the Program Plan to evolve as packaging evolves.
- Provide more clarity on the definition and treatment of bioplastics in the Plan (i.e., some are accepted in some programs today, some are certified compostables and some don't currently have an end-user or end value).

Involve Partners

Overarching theme to feedback: Involve partners and recognize the role all stakeholders can play in future success.

As noted by the previous theme, many sectors and stakeholders are involved in the change to a full EPR recycling program in Saskatchewan. Consultation participants recommend leveraging the strengths and assets of stakeholders as partners in this change. Specific requests include:

- Increase the amount of time allowed under the Program Plan to enable meaningful consultation and participation by stakeholders in the design of each transition phase.
- Allow the continuation of regional waste management partnerships and include whole regions in a single transition phase.
- Make a commitment to social impact by utilizing existing recycling infrastructure established by social enterprises.
- Strengthen the role of producer members in program governance.
- Work with other stewardship organizations to avoid overlap with other regulations and to coordinate material recovery to the fullest extent possible.

Consistency is Important

Overarching theme to feedback: Achieve fairness through consistency.

Consultation participants expect government regulation and public services to be fair to all involved. While stakeholders may describe specific elements of fairness based on their perspective, all seek consistency in MMSW's approach to transition. Common sentiments from the comments received highlight the ways in which stakeholders identify fairness may be achieved.

- Make interprovincial harmonization (of rules, materials and reporting) a priority.
- Clarify when materials will be transitioned under the program. Avoid removing materials already accepted by some programs (e.g., glass). Assume that non-transitioned communities will also see these materials as advertising, which can be expected to cause confusion.
- Provide a definition (i.e., population or geographic thresholds) for fair, reasonable, efficient and effective access to recycling that can be implemented on a province-wide basis.
- Recognize the hybrid nature of the programs offered in communities expected to be included in Transition Phase 1 and provide a 'whole community' approach to transition rather than separating collection streams.
- Recognize specific agreements in place for specialty materials (e.g., Nespresso pods, Pringles spiral-bound containers, etc.)

Acknowledge Jurisdictional Realities

Overarching theme to feedback: Recognize jurisdiction and public perceptions (which may differ from who is actually responsible).

Stakeholders currently involved in waste-related public services (including communities, companies and organizations) expressed perspectives regarding current realities and public perceptions. To address these perspectives, popular recommendations are to:

- Recognize costs to manage non-recyclable materials will be realized by municipalities and landfill operators.
- Recognize that residents tend to ask all waste-related questions of their local government and/or contracted waste operator. They will need to be able to provide answers at each stage of transition.
- Align collection eligibility criteria to local service definitions for other waste streams.

Recognize Market Realities

Overarching theme to feedback: Ensure producer fees and collector incentives recognize market realities and encourage good environmental outcomes.

Consultation participants shared many comments describing ways in which market dynamics, particularly financial considerations, may affect the success or failure of the transition to a full EPR recycling program.

Common sentiments included:

- Ensure a focus on outcomes is maintained to enable innovation and deliver value-for-money.
- Focus on economies of scale to promote diversion to a viable end market.
- Fees incentivizing change is helpful inside organizations (e.g., using Canada Plastics Pact and other best practices), but producer education is also necessary to avoid unintended consequences such as lightweighting instead of recyclability.
- Use targets and the waste management hierarchy to reduce possibility for producers to push costs down to consumers rather than implement changes to packaging – the exchange of money does not help the environment.
- Ensure payments cover collection costs for municipalities and contractors, and ensure incentives are reflecting their true costs.
- Ensure financial prudence is in place by maintaining simple administrative and reporting processes.
- Recognize the importance of good data to achieve good outcomes.

Avoid Disruption

Overarching theme to feedback: Avoid disruption by maintaining a focus on a seamless transition.

Consultation participants expressed keen awareness of impacts to residents and consumers. Common sentiments describing ways to best engage the whole province include:

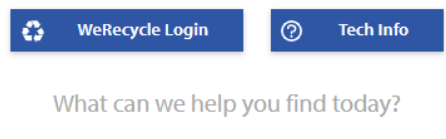
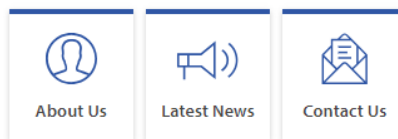
- A smooth transition is a quick transition that takes more time to plan to ensure it is well communicated and implemented.
- Retain existing curbside pickups in low density population areas (i.e., ensure collection incentive payments to collectors is sufficient).
- Establish service accessibility targets.
- Maintain a focus on harmonizing accepted materials across the province as an imperative throughout the transition process.

Appendix A

Promotional Materials

News post on Multi-Material Stewardship Western website

MMSW announced launch of the consultation period and supporting webpage on June 13.



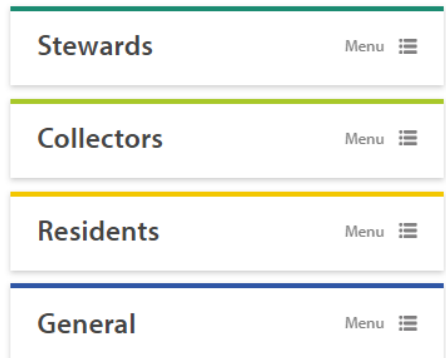
Program Plan Consultation

News posted on June 13, 2023

Multi-Material Stewardship Western (MMSW) is pleased to provide its draft Household Packaging and Paper Stewardship Program Plan ("Program Plan") for stakeholder feedback. The Program Plan describes MMSW's objectives, commitments and a number of transition phases that will be implemented as the program transitions from a shared responsibility model to a system that is entirely managed and operated on behalf of its producer members.

MMSW is working with the national, not-for-profit producer led producer responsibility organization (PRO), Circular Materials, to provide Saskatchewan residents and producers with the benefits of a nationally integrated approach to recycling.

For consultation session details and to review the draft Program Plan, please visit our consultation webpage.



Latest News

- Jun 13** **Program Plan Consultation**
Multi-Material Stewardship Western (MMSW) is pleased to provide its draft Household Packaging and Paper Stewardship Program Plan ("Program Plan") for stakeholder feedback.... [Read More](#)
- Mar 31** **The Province of Saskatchewan has released updated regulations for the management of waste packaging and paper**
On March 31, 2023, the Saskatchewan Ministry of Environment released updated Household Packaging and Paper Stewardship Program Regulations, 2023, which... [Read More](#)

Email invitation to Stakeholders

Beginning on June 13, MMSW sent the following email to stakeholders.



MMSW Program Plan Consultation

Multi-Material Stewardship Western (MMSW) would like to invite you to engage with us in the development of a new Program Plan for Saskatchewan.

As you may be aware, the Household Packaging and Paper Stewardship Program Regulations, 2023 (“the Regulation”) was released and came into effect on March 31, 2023. This will require the transition to a full extended producer responsibility (EPR) model, whereby producers assume operational and financial responsibility for collecting and recycling packaging and paper products in Saskatchewan. A Program Plan, fully consulted on with stakeholders, must be submitted to the Ministry of Environment by September 27, 2023.

MMSW is pleased to provide its draft Household Packaging and Paper Stewardship Program Plan (“Program Plan”) for feedback by local governments and communities. MMSW is working with the national, not-for-profit producer-led producer responsibility organization (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.

To review the draft Program Plan please visit the [consultation webpage](#).

Consultation on the draft Program Plan will take place between June 13 and August 13, 2023. Consultation sessions provide an opportunity to learn more about the draft Program Plan, ask questions and provide feedback.

All Urban, Rural, Northern, First Nation and Métis communities are invited to participate in any of the following sessions:

- Regina Session (in person), Tuesday, June 27, 1:30 – 4:00 p.m. CST
- Saskatoon Session (in person), Wednesday, June 28, 1:30 – 4:00 p.m. CST
- Virtual Session (dedicated to local governments and communities), Wednesday, July 5, 10:00 a.m. CST
- Virtual Session (open to all stakeholder groups), Monday, July 10, 1:30 p.m. CST

To register for one or more in-person or virtual sessions, please visit the [consultation webpage](#).

Written feedback and comments on the draft Program Plan will also be accepted by MMSW until August 13, 2023, and can be submitted to info@multimaterialsw.ca.

Newsletter content

The following information was emailed to 11 organizations.

Email Request to Organizations with Newsletters / Eblasts

Subject: Consultation on Recycling Program Transition - Please share in upcoming email newsletter

Body:

As you may be aware, Multi-Material Stewardship Western (MMSW) has launched public consultation on its draft Household Packaging and Paper Stewardship Program Plan. A Program Plan must be submitted to the Ministry of Environment by September 27, 2023 and therefore we are seeking assistance in communicating the opportunity to participate in consultation which will take place between June 13 and August 13, 2023.

We have crafted wording for a short article or blog post. We appreciate your assistance in getting the word out to your network through your email distribution list.

Our social media campaign will also begin soon. Your posting and sharing of consultation opportunities would be of great value.

Post:

On March 31, 2023, the Saskatchewan Ministry of Environment released updated [Household Packaging and Paper Stewardship Program Regulations, 2023](#), which call for a transition to a full Extended Producer Responsibility (EPR) model, whereby producers assume operational and financial responsibility for collecting and recycling packaging and paper products in Saskatchewan. A Program Plan, fully consulted on with stakeholders, must be submitted to the Ministry of Environment by September 27, 2023.

Multi-Material Stewardship Western (MMSW) is pleased to provide its draft [Household Packaging and Paper Stewardship Program Plan](#) ("Program Plan") for stakeholder feedback. The Program Plan describes MMSW's objectives, commitments and a number of transition phases that will be implemented as the program transitions from a shared responsibility model to a system that is entirely managed and operated on behalf of its producer members.

Consultation on the draft Program Plan will take place between June 13 and August 13, 2023. Consultation sessions provide an opportunity to learn more about the draft Program Plan, ask questions and provide feedback.

Interested individuals and organizations are encouraged to register for one or more in-person or virtual Program Plan consultation sessions.

Regina Session (in person), Tuesday, June 27, 1:30 p.m. to 4:00 p.m. CST
Holiday Inn Express & Suites (4255 Albert Street)
[Register](#)

Saskatoon Session (in person), Wednesday, June 28, 1:30 p.m. to 4:00 p.m. CST
Sandman Signature Saskatoon (2815 Lorne Avenue)
[Register](#)

Virtual Session, Monday, July 11, 2023, 1:30 p.m. to 3:00 p.m. CST
[Register](#)

Advertisements

The following ad copy helped build awareness for the consultation, particularly targeting the general public.



Responsibility for the recycling of household packaging and paper is changing in Saskatchewan

On March 31, 2023, the Saskatchewan Ministry of Environment released the updated *Household Packaging and Paper Stewardship Program Regulations, 2023*, which call for a transition to a full Extended Producer Responsibility (EPR) model.

Producers of packaging and paper must now assume operational and financial responsibility for collecting and recycling these products in Saskatchewan. A Program Plan to meet this new EPR obligation must be submitted to the Ministry of Environment by September 27, 2023.

Multi-Material Stewardship Western (MMSW), a non-profit organization established to support obligated businesses meet their requirements under the recycling regulation, has prepared a draft [Household Packaging and Paper Stewardship Program Plan](#). It describes the objectives, commitments and number of transition phases from the current shared responsibility model to one that is entirely managed and operated by producers.

MMSW is working together with Circular Materials, the national not-for-profit producer responsibility organization (PRO), to provide Saskatchewan residents and producers with the benefits of a nationally integrated approach to recycling. Consultation is taking place between June 13 and August 13, 2023. In-person and virtual consultation sessions provide an opportunity to learn more about the draft Program Plan, ask questions and provide feedback. Sessions begin on Tuesday, June 27. The final session is Monday, July 10. Feedback can also be submitted in writing until August 13, 2023 via email to info@multimaterialsw.ca.

Interested individuals and organizations are encouraged to register for one or more in-person or virtual Program Plan consultation sessions by visiting our website: mmsk.ca/consultation.

Alternate ad for circulations after June 27



Responsibility for the recycling of household packaging and paper is changing in Saskatchewan

On March 31, 2023, the Saskatchewan Ministry of Environment released the updated *Household Packaging and Paper Stewardship Program Regulations, 2023*, which call for a transition to a full Extended Producer Responsibility (EPR) model.

Producers of packaging and paper must now assume operational and financial responsibility for collecting and recycling these products in Saskatchewan. A Program Plan to meet this new EPR obligation must be submitted to the Ministry of Environment by September 27, 2023.

Multi-Material Stewardship Western (MMSW), a non-profit organization established to support obligated businesses meet their requirements under the recycling regulation, has prepared a draft [Household Packaging and Paper Stewardship Program Plan](#). It describes the objectives, commitments and number of transition phases from the current shared responsibility model to one that is entirely managed and operated by producers.

MMSW is working together with Circular Materials, the national not-for-profit producer responsibility organization (PRO), to provide Saskatchewan residents and producers with the benefits of a nationally integrated approach to recycling. Consultation is taking place between June 13 and August 13, 2023. In-person and virtual consultation sessions provide an opportunity to learn more about the draft Program Plan, ask questions and provide feedback. Sessions are scheduled until Monday, July 10. Feedback can also be submitted in writing until August 13, 2023 via email to info@multimaterialsw.ca.

Interested individuals and organizations are encouraged to register for a virtual Program Plan consultation session by visiting our website: mmsk.ca/consultation.

Social media posts

 Saskatchewan Recycles - MMSW
June 21 · 🌐

There are new Household Packaging and Paper Stewardship Program Regulations in Saskatchewan. To support these regulations, we have prepared a draft Program Plan and are working together with Circular Materials on consultations sessions. Share your feedback: mmsk.ca/consultation.



Multi-Material

Stewardship Western

 **Multi-Material SW**
@SKRecycles

There are new Household Packaging and Paper Stewardship Program Regulations in Saskatchewan. To support these regulations, we have prepared a draft Program Plan and are working together with [@CircMaterials](#) on consultations sessions. Share your feedback: mmsk.ca/consultation.



Multi-Material

Stewardship Western

Social media posts

 Saskatchewan Recycles - MMSW
June 23 · 🌐

Responsibility for the recycling of household packaging and paper is changing in Saskatchewan. We are working with Circular Materials to consult on a draft Household Packaging and Paper Stewardship Program Plan based on new provincial regulations. Learn more:
mmsk.ca/consultation



Multi-Material Stewardship Western

MMSK.CA i
MMSW Program Plan Consultation : Multi-Material Stewardship Western Learn more

 **Multi-Material SW**
@SKRecycles

Responsibility for the recycling of household packaging and paper is changing in Saskatchewan. We are working with [@CircMaterials](#) to consult on a draft Household Packaging and Paper Stewardship Program Plan based on new provincial regulations. Learn more:
mmsk.ca/consultation



Multi-Material Stewardship Western

Social media posts



Saskatchewan Recycles - MMSW
August 8 · 🌐



To support new Household Packaging and Paper Stewardship Program Regulations in Saskatchewan, we have prepared a draft Program Plan. Share your feedback by August 13: <http://mmsk.ca/consultation>



Multi-Material SW
@SKRecycles





To support new Household Packaging and Paper Stewardship Program Regulations in Saskatchewan, we have prepared a draft Program Plan. Share your feedback by August 13: mmsk.ca/consultation



Appendix B

Materials Provided to Support Engagement

In-Person Session Agendas

<div data-bbox="344 632 597 737"></div> <div data-bbox="224 772 716 846"><p>Regina Session (in person) – MMSW Program Plan Consultation Tuesday, June 27, 2023 Holiday Inn Express & Suites (4255 Albert Street)</p></div> <div data-bbox="435 888 505 909"><p>AGENDA</p></div> <div data-bbox="159 926 737 1461"><p>1:30 p.m. Welcome and introductions – Brenda Wallace, meeting facilitator Opening presentation – Kelly Goyer, Director, Field Services, MMSW Ann Danilevich, Manager, Stakeholder Relations, MMSW</p><p>Question and Answer period Poll: <i>Initial Reactions?</i></p><p>Small Group Discussion: Understanding Transition Impact Consider the following question with the participants at your table.</p><p><i>What are the significant impacts for:</i></p><ul style="list-style-type: none">o <i>Producers and Producer Associations?</i>o <i>Local Governments and Communities?</i>o <i>Waste Management Companies?</i>o <i>Saskatchewan Residents?</i><p>Small Group Activity: Defining Success This rapid idea-generating activity involves individual and table group work.</p><p><i>What are the keys to a successful transition and best outcome for recycling in Saskatchewan?</i></p><p>Final Discussion: Feedback to MMSW Turn the day's table work into specific advice to MMSW on the Program Plan.</p><p>Closing Poll</p><p>4:00 p.m. Session Wrap Up</p></div> <div data-bbox="215 1499 724 1520"><p><i>Join the MMSW Team for snacks, networking and informal dialogue until 5:30 p.m.</i></p></div>	<div data-bbox="1029 646 1276 751"></div> <div data-bbox="899 783 1408 856"><p>Saskatoon Session (in person) – MMSW Program Plan Consultation Wednesday, June 28, 2023 Sandman Signature Saskatoon (2815 Lorne Avenue)</p></div> <div data-bbox="1117 898 1187 919"><p>AGENDA</p></div> <div data-bbox="846 936 1414 1461"><p>1:30 p.m. Welcome and introductions – Brenda Wallace, meeting facilitator Opening presentation – Kelly Goyer, Director, Field Services, MMSW Ann Danilevich, Manager, Stakeholder Relations, MMSW</p><p>Question and Answer period Poll: <i>Initial Reactions?</i></p><p>Small Group Discussion: Understanding Transition Impact Consider the following question with the participants at your table.</p><p><i>What are the significant impacts for:</i></p><ul style="list-style-type: none">o <i>Producers and Producer Associations?</i>o <i>Local Governments and Communities?</i>o <i>Waste Management Companies?</i>o <i>Saskatchewan Residents?</i><p>Small Group Activity: Defining Success This rapid idea-generating activity involves individual and table group work.</p><p><i>What are the keys to a successful transition and best outcome for recycling in Saskatchewan?</i></p><p>Final Discussion: Feedback to MMSW Turn the day's table work into specific advice to MMSW on the Program Plan.</p><p>Closing Poll</p><p>4:00 p.m. Session Wrap Up</p></div> <div data-bbox="902 1499 1401 1520"><p><i>Join the MMSW Team for snacks, networking and informal dialogue until 5:30 p.m.</i></p></div>
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Agenda



Presentation Slides

Slide decks for each session are available on the [consultation webpage](#).

In-person sessions also used the following slides to support engagement activities.

Question & Answer Period



Poll: Initial Reactions?



Multi-Material
Stewardship Western

2



GRAB YOUR SMARTPHONE



GO TO: 'menti.com'
Enter code '4104 8084'

Or use this
QR code



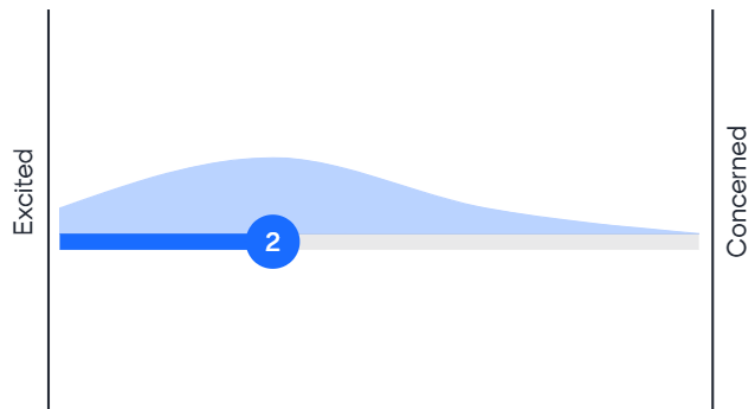
Multi-Material
Stewardship Western

3

Join at menti.com use code 2233 5983

Mentimeter

How are you feeling about the MMSW Program Plan
based on what you have learned so far?



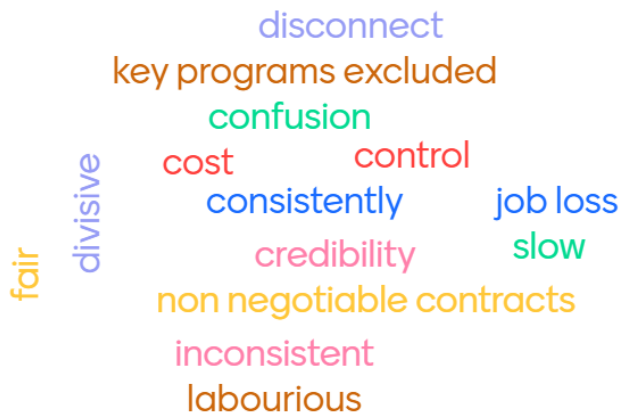
SAMPLE POLL RESULTS

What word describes your greatest hope for a new recycling program in Saskatchewan?
18 Responses



SAMPLE POLL RESULTS

As recycling responsibilities change, what word describes your greatest concern?
14 Responses



SAMPLE POLL RESULTS

Discussion & Feedback Activities



Small Group Discussion

Understanding Transition Impact

What are the significant impacts for:

- Producers and Producer Associations?
- Local Governments and Communities?
- Waste Management Companies?
- Saskatchewan Residents?

Small Group Discussion

Defining Success

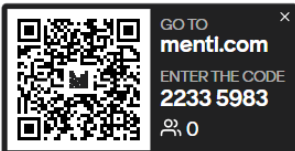
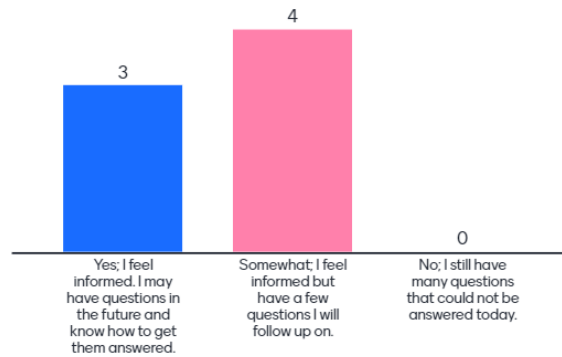
What are the keys to a successful transition and best outcome for PPP recycling in Saskatchewan?

Small Group Discussion

Feedback to MMSW

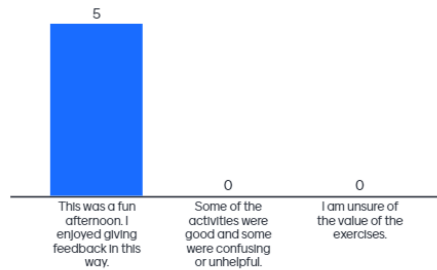
What is your specific feedback to MMSW on the draft Program Plan?

Did you receive the information you were looking for today?



SAMPLE POLL RESULTS

Multiple choice: How did you feel about the opportunity to participate in group discussions today?



SAMPLE POLL RESULTS

Consultation Next Steps



Consultation Process

- In-person sessions:
 - Regina - June 27
 - Saskatoon - June 28
- Virtual sessions:
 - Producers and Producer Associations - July 4
 - Local Governments and Communities - July 5
 - Waste Management Companies - July 5
 - All Stakeholder Groups - July 10
- Feedback can be submitted in writing until August 13 via email to info@multimaterialsw.ca.



Thank You

Join us for snacks, networking and informal dialogue.



Engagement Insights Report

At the conclusion of in-person and virtual sessions, the following high level summary was shared with all registrants and posted the [consultation webpage](#). Intended use of this summary was to enable stakeholders to reflect on the initial phase of consultation to confirm, clarify and identify important elements of feedback for MMSW in advance of the August 13 deadline (ending the consultation period).



Multi-Material Stewardship Western (MMSW) Program Plan Consultation – Engagement Insights

To gain feedback from its stakeholders, MMSW conducted a number of in-person and virtual consultation sessions in June and July 2023.

- Regina, in-person: Tuesday, June 27
- Saskatoon, in-person: Wednesday, June 28
- Saskatoon, Advisory Committee in-person session: Wednesday, June 28
- Producers and Producer Associations, virtual: Tuesday, July 4
- Local Governments and Communities, virtual: Wednesday, July 5
- Waste Management Companies, virtual: Wednesday, July 5
- All Stakeholder Groups, virtual: Monday, July 10

In-person and virtual consultation sessions provided an opportunity for stakeholders to raise questions and offer feedback on the draft [Household Packaging and Paper Stewardship Program Plan](#). The following represent major themes from discussions at these sessions.

Stakeholder Questions (Major Themes)

Producers, local governments, environmental NGOs, waste companies and other stakeholders participated in sessions and raised a number of questions. A summary of specific questions (combined and paraphrased, where applicable) is available on the [consultation webpage](#). Topical themes include:

Transition Phases and Timelines

- Which communities will be included in Transition phases 1 and 2
- What role communities currently participating in the MMSW program might have in the new program
- Regional approaches and specific local programs (such as the treatment of community depots in cities with curbside and multi-family collection programs)

Collection

- Eligibility criteria to be used for determining curbside vs. depot collection.
- Communities with existing contracts and user fees raised questions about their continued involvement and implications for contractual relationships and fees
- How MMSW might provide coverage for the entire province
- The services agreement “offer” process

Post Collections

- MMSW's procurement process generated questions about existing facilities and community arrangements

Accepted Materials

- Details on the process for creating a common list of accepted materials across all of Saskatchewan
- Communications with residents (in support of participation) and education of producers (in support of innovation)

Producers

- Program administration and questions related to producer fees

Stakeholder Feedback (Major Themes)

Encouraged to identify keys to success, stakeholders shared the following:

- The importance of communication with all stakeholders through all phases of transition as well as commitment to ongoing communications to optimize recycling in Saskatchewan
- Maintaining a focus on environmental and financial benefits when communicating
- Involving partners and recognizing the role all stakeholders can play in future success
- Achieving fairness through consistency
- Recognizing jurisdiction and public perceptions (which may differ from who is actually responsible)
- Ensuring producer fees and collector incentives recognize market realities and encourage good environmental outcomes
- Avoiding disruption by maintaining a focus on a seamless transition

Consultation closes on August 13, 2023. All stakeholders are encouraged to share any questions or feedback that are not reflected in what MMSW has heard so far by emailing info@multimaterialsw.ca.

Appendix C

List of Participants

The following organizations registered for and/or attended at least one of the in-person or virtual consultation sessions.

Producers / Producer Associations

A & W Canada	Makita Canada
AbbVie Corporation	McKesson Canada
Air King Limited	Melitta Canada
Bayer AG	Mentholatum Canada
Bath & Body Works Canada	Molson Coors Beverage Company
Benjamin Moore	Nespresso Canada
Best Way Recycling & Consulting	Nestle Canada
Canadian Consumer Specialty Products Association	National Smokeless Tobacco Company
Carton Council of Canada	Oetker
Church & Dwight Canada	Petvalu
Coca-Cola Limited	PPG Industries
Coke Canada	Prairie Pride Natural Foods Ltd.
Conglom Inc.	Reckitt Benckiser (Canada) Inc.
Costco Wholesale	Red Bull
Cypress Credit Union	Restaurants Canada
Dell Inc.	Retail Council of Canada
Empire Life	Right Hook Strategies
Federated Co-operatives Limited	Riviana Foods
Ferring Canada	RONA Inc.
Food, Health & Consumer Products of Canada	RW Consumer Products
Fujifilm Canada	Saputo
Game Stop	Sasktel

Gaylea Foods	Save On Foods
General Mills	Scotts Canada
Hartz	Saskatchewan Government Insurance (SGI)
Home Depot	Sherwin-Williams
HP Canada	Sleeman Breweries
JM Smucker	Sony Corporation
Johnson & Johnson Canada	Sphera Solutions, Inc.
KAO	TJX Canada
Kruger Products	Thomas, Large & Singer
Lactalis Canada	Thomas Fresh
Lantic Inc.	United Natural Foods (UNFI Canada)
Lindt & Sprüngli (Canada), Inc.	Unilever
Loblaws Inc.	VistaPrint
London Drugs	Wakefield Canada Inc.
L'Oréal Canada	Walmart
Lululemon Athletica	Wawanesa Insurance
	Wilton Brands LLC

Local Governments

City of Lloydminster	Town of Biggar
City of Melfort	Town of Borden
City of Prince Albert	Town of Bruno
City of Regina	Town of Clavet
City of Saskatoon	Town of Eastend
City of Swift Current	Town of Grand Coulee
R.M. of Canaan (No. 225)	Town of Lemberg
R.M. of Foam Lake (No. 276)	Town of Osler
R.M. of Laird (No. 404)	Town of Radville
R.M. of Laurier (No. 38)	Town of Saltcoats
R.M. of Oakdale (No. 320)	Town of White City
R.M. of Pelletier (No. 107)	Village of Frobisher

R.M. of Progress (No. 351)	Village of Grayson
R.M. of Spiritwood (No. 496)	Village of Kinley
R.M. of Stonehenge (No. 73)	Village of Mervin
R.M. of Torch River (No. 488)	Village of Neville
Town of Aberdeen	Saskatchewan Association of Rural Municipalities
Town of Asquith	Saskatchewan Urban Municipalities Association

Waste Management Companies / Regional Waste Authorities

Association of Regional Waste Management Authorities of Saskatchewan Inc.	Emterra Group
Best Way Recycling & Consulting	Loraas Disposal North
Easybin Waste Removal	

Other Stewardship Organizations / Environmental NonProfits

Circular Materials	SARCAN Recycling
Éco Entreprises Québec	Saskatchewan Association for Resource Recovery Corp.
Multi Material Stewardship Manitoba	Saskatchewan Waste Reduction Council

Appendix D

Submissions Received

Written feedback was submitted to MMSW during the consultation period ending August 13, 2023.

- Association of Regional Waste Management Authorities of Saskatchewan Inc.
- Carton Council of Canada
- Canadian Consumer Specialty Products Association
- City of Prince Albert
- City of Regina
- City of Saskatoon
- City of Yorkton
- Food, Health & Consumer Products of Canada
- Kwik Bagit
- Retail Council of Canada
- Restaurants Canada
- SARCAN Recycling
- Saskatchewan Waste Reduction Council
- Resident from town of Battleford

Copies of these submissions follow.



**Association of Regional Waste
Management Authorities of
Saskatchewan Inc.**

Suite 226 - 510 Cynthia Street
Saskatoon, SK S7L 7K7

August 10, 2023

Multi-Material Stewardship Western (MMSW)
401-333 3rd Avenue North,
Saskatoon, S7K 2M2

Via e-mail: info@multimaterialsw.ca

Dear Kelly,

Congratulations on creating a very comprehensive Household Packaging and Paper Program Plan. In particular, we appreciated the information session(s) on June 28/23 and the open and honest conversations that took place.

We found that the issues that are of most concern to ARWMAS' members weren't so much what is in the draft plan, but what is not presented. The lack of detail with regard to the transition process is concerning for many of our members that offer hybrid programs that deliver multiple types of collection systems within the same municipal entity. Within the same regional waste authority, some members will be in Phase 1, many of them in Phase 2, and our depot-based programs in Phase 3 may have up to a 5-year wait to be part of the fully funded program. Does this also mean that a municipality that offers curbside and depot collection systems would be receiving two different levels of funding until the depots have been fully transitioned?

In the opening sentence in the Program Financing section on page 7, your document appears to indicate that producers can chose to participate in the program, or not. We thought that the regulation requires industry participation, or is this a reference to the possibility that there could be multiple PRO's for this program, and so some of those producers may not be your members?

With regard to your Delivery Principles on page 12, we noted in the 2nd bullet (Provincial Accessibility) that only a "fair, reasonable, efficient and effective level of collection" is referenced. There is no indication that those same principles will apply to the processing of the collected materials. This is important when the economic incentives mentioned in bullet #3 are tied to increased recovery and recycling efforts.

We found it interesting that glass bottles and jars would be part of Phase 3 (pg. 13), as Sarcam Recycling is operating a very efficient program for diversion of this packaging medium from landfill through its bottle depot system. Given the contamination that this type of packaging creates when it breaks apart in the single stream collection system, we would like to see a greater emphasis on ensuring that material can be diverted out of single stream recycling sooner than later.

...2/

We were surprised to see that the current shared pay-out model will eventually wind down (pg. 22), and that non-transitioned communities will have to transition to the new model.

We are wondering who will pay for the actual delivery of Resident Communication, as the plan states on Page 24 that communities "retain primary responsibility for delivering resident communication strategies". In section 2.3 Program Financing, on page 7, the Resident Awareness section states that industry is responsible for the "costs to promote program awareness". We would appreciate greater clarity on this issue.

On page 30, your chart in section 5.3.3. Historic PPP Category Recycling Rates appears to make sense, until we saw the rate for Printed Paper. We don't have information that states what kind of printed paper is included in that category, but the number appears to be excessive. If only 98% could be so!

We would also like to address our concern for the SARC workshops which for decades have been processing recyclable materials delivered to their facilities. Opportunity for employment for adults with disabilities has been a hallmark of the province of Saskatchewan and any reduction in those opportunities would be tragic.

The last concern that we would like to address is the fate of existing capital equipment that some of our regional waste authorities have invested in for their recycling operations. We recognize that some of their equipment, such as loaders and bobcats serve multiple purposes, i.e. recycling and waste operations. However, many of our members have built material recovery facilities (MRF's) and installed equipment specific to the processing of recyclable materials. We understand a mapping exercise will be undertaken to determine the number of MRF's required and their location. We are concerned that some of our current processing facilities may fall outside your service areas, and we are concerned about those facilities and trucks, bins, etc. that are part of that collection and processing system that regions such as REACT own.

Thank you for the opportunity to participate in this review and engagement process. The recordings of the virtual sessions, summary documents, and in-person presentation were very helpful in preparing our response.

Yours truly,
ARWMAS



Keith Matheson, Chair

/alm

August 3rd, 2023

Tamara Burns, Executive Director
Multi Material Stewardship Western (MMSW)
Sent via email to info@multimaterialsw.ca

Dear Tamara:

Thank you for the opportunity to provide comments on the draft Household Packaging and Paper Stewardship Program Plan, as released on June 13th. We are in broad agreement with the proposed plan. We would nonetheless like to make the following points.

Make Available the Excel-Based model Used by MMSW to Set Fees

In the spirit of transparency, performance tracking, and continuous improvement, we strongly encourage MMSW to make available the excel-based model that it uses to set annual fees. This is the practice in place in Quebec ([Éco Entreprises Québec](#), click on “Contribution Table Calculations - Excel”) and Manitoba ([Multi-Material Stewardship Manitoba](#), click on “2023 MMSM Four-Step Fee Model”) as well as in Ontario until 2021, when Stewardship Ontario retired the fee-setting process in the context of its wind-down. This would allow Carton Council to access the following information: tonnes of cartons supplied by your members, tonnes of cartons collected through your system, and the carton collection rate. Those data points would then allow us to track our performance in Saskatchewan against the national goal that has been set for carton collection-recycling (70% by 2025).

Accepted Materials

We were very pleased to see “polycoated cartons” in the list of examples of the materials that will be targeted as accepted PPP in Transition Phase 1 and 2, as presented on page 13 of the document.

Given the importance of standardizing the list of materials targeted for collection across the province, we recommend strengthening the language used in section 4.2.1 in terms of MMSW’s commitment to achieving this outcome. Instead of “MMSW will work to expand and harmonize the list of accepted materials [...]”, we recommend stating that “MMSW will expand and harmonize the list of accepted materials [...]”.

Follow us on [LinkedIn](#) for news and information about carton recycling and our activities.

Thank you for this opportunity to submit comments on the proposed Household Packaging and Paper Stewardship Program Plan. We look forward to our continued collaboration.

Best regards,



Isabelle Faucher
Managing Director, Carton Council of Canada

CC. Kelly Goyer

August 11, 2023

Multi-Material Stewardship Western (MMSW)
401-333 3rd Avenue North
Saskatoon, SK
S7K 2M2

Via e-mail: info@multimaterialsw.ca

To Whom It May Concern:

Subject: CCSPA Submission on the Multi-Material Stewardship Western Draft Household Packaging and Paper Stewardship Program Plan

The Canadian Consumer Specialty Products Association (CCSPA) is a national trade association that represents 40 member companies across Canada that manufacture, process, package and distribute consumer, industrial and institutional specialty products, such as soaps and detergents, pest control products, aerosols, hard surface disinfectants, deodorizers and automotive chemicals. We are a \$20 billion industry directly employing over 12,000 people, with annual exports of \$1 billion.

CCSPA and our members have been fully engaged in all aspects of post-consumer waste developments across Canada. We have provided comments in response to many provincial Packaging and Printed Paper (PPP) and Household Hazardous Waste (HHW) programs across the country. Our comments are guided by the following three principles:

- sound evidence is the basis for all decisions,
- due process and consultation, and
- effective communications to Canadians.

These principles encompass the need for good governance of programs, due process including transparency with appropriate checks and balances, and striving for national and international harmonization where possible.

CCSPA has engaged in all provincial government consultations on packaging, paper and plastic including in Alberta, British Columbia, Saskatchewan, Manitoba, Ontario, Quebec, New Brunswick, and the Yukon, as well as via the CCME.

OVERALL COMMENTS

CCSPA and our members support Saskatchewan moving towards full Extended Producer Responsibility (EPR). We are encouraged by the approach proposed by MMSW and Circular Materials in this Draft Plan. The proposed approach reflects the key recommendations provided by CCSPA, including:

- ***Direct Ministerial oversight of the Program.*** The Ministry maintains responsibility for establishing expectations and verifying compliance while the obligated stewards and their PRO independently develop and implement programs to achieve target outcomes. The Ministry and stewards can engage directly without the added burden and costs of a third-party delegated authority.
- ***Producer Responsibility Organizations (PROs) can represent numerous brand owners through a single product stewardship plan.*** Producers can subscribe to a PRO to meet all provincial requirements, enable collection and recycling systems, and undertake the efficient registering and accounting for designated materials. The PRO has all registration, reporting, and auditing functions and capabilities to manage the program as well as to interact effectively with Government on compliance and enforcement needs. PROs will implement the provincial programs professionally and efficiently on behalf of the individually responsible organizations.
- ***Interprovincial harmonization of materials, reporting, monitoring, and definitions.*** As proposed, the Program Plan largely aligns with other Canadian jurisdiction definitions and enables PROs to tailor a program plan that harmonizes to the furthest extent feasible.
- ***Full financial and operational control for the producer companies.*** The Program Plan is outcome-based and allows producers and their PRO to determine the best way to achieve target outcomes. PROs are able to develop practical and achievable program plans that deliver value-for-money.
- ***Producer hierarchy reflects that brand owners be given first right of refusal for EPR responsibility.*** CCSPA members are proactive stewards and generally wish to be the stewards of their own packaging and printed paper of the brand they own. Brand owners alone can account for 100% of sales in each province and serve as point of contact for 100% of their packaging and paper sales in Canada.
- ***The Program is focused on residential PPP.*** The Transition Plan captures residential sources of PPP while excluding industrial, commercial, and industrial (IC&I) generators.

CONSIDERATIONS

Further to the importance of interprovincial harmonization and value-for-money, CCSPA encourages clarity in the respective responsibilities and scope of national collaboration between MMSW and Circular Materials. Producers prioritize simplicity and cost-efficiency in meeting their regulatory obligations via a PRO.

SUMMARY AND NEXT STEPS

servicing makers of formulated products for home and commercial use since 1958

130 Albert Street, Suite 800, Ottawa, Ontario, K1P 5G4 Tel. (613) 232-6616

<http://www.ccspace.org>; <http://www.healthycleaning101.org>

CCSPA supports MMSW, Circular Materials, and the Province of Saskatchewan in moving towards an EPR framework utilizing the Program Plan. The Plan as proposed provides a strong foundation for success and incorporate many of the lessons learned from other provincial programs. Any changes to the Program Plan should be minor in nature and align with the principle of full producer responsibility and value-for-money.

CCSPA is committed to providing reliable, evidence-based information to support the development of EPR programs across the country. We would be pleased to provide further information and insights based on our experience with EPR to date. We appreciate the communication we have received to date and would like to continue to fully participate in any and all consultations.

Thank you again for this opportunity to provide input. We look forward to working with MMSW and Circular Materials as the Program Plan consultation moves forward and moves to implementation. Please feel free to let me know how we can assist further.

Sincerely,

A handwritten signature in black ink that reads "Simon Kinsman". The signature is written in a cursive, flowing style.

Simon Kinsman
Director, Regulatory Affairs

cc: Allen Langdon, CEO, Circular Materials
cc: Baljit Lalli, CCO, Circular Materials
cc: Kelly Goyer, Director, MMSW

Consultation by Multi Material Stewardship Western (MMSW)

Draft Program Plan

The City of Prince Albert has reviewed the materials provided by MMSW for consultation purposes and attended the consultation session July 5, 2023. During the consultation session it was indicated that additional feedback was requested and could be emailed to info@multimaterialsw.ca until August 13, 2023.

In response to the request for additional information the City of Prince Albert is providing the following comments.

- The City of Prince Albert currently collects recycling material through both curbside collection and operation of multiple recycling depots.
- Curbside collection occur from approximately 11,000 households and is conducted directly by the City.
- There are 6 recycling depots, collection from these depots is done both under contract and directly by the City.
- The City of Prince Albert intends to continue to directly collect recycling and operate recycling depots in the City.
- The City of Prince Albert is currently the largest member of the regional recycling nonprofit corporation, the North Central Saskatchewan Waste Management Corporation (NCSWMC) and we are supportive of continuing on with this partnership in a new recycling material structure.
- The other member communities include:
 - Village of Albertville
 - Town of Birch Hills
 - RM of Buckland #491
 - RM of Garden River #490
 - District of Lakeland #521
 - Village of Meath Park
 - Village of Paddockwood
 - City of Prince Albert
 - Prince Albert National Park (PANP)
 - RM of Prince Albert #461
 - Village of Weirdale
 - Village of Christopher Lake
 - Resort Village of Elk Ridge
- The City believes that any future program must consider and provided adequate reimbursement for the full cost of recycling collection activities and must ensure services are not decreased.
- The City believes that working with municipal governments is the key for recycling programs to be successful, as such we would choose to be directly involved in recycling program operations and decision making within our municipality or with our partners in the NCSWMC. As such, we would not be supportive of MMSW directly contracting out services provided to our residents.

- The City of Prince Albert recycling activities currently includes a sorting facility operated by NCSWMC located in our city and we believe a facility operating in our local region that can service the needs of north and central Saskatchewan is part of the needed infrastructure as recycling activities continue to grow.
- The City is interested in participating in discussions on the acceptable material for a standardized new program and generally look forward to increasing the products being recycled.

Please feel free to contact us if we can provide additional information or to further discuss program implementation options.

Todd Olexson - Sanitation Manager

tolexson@citypa.com

(306) 953-2586

Councilor Dawn Kilmer

dkilmer@citypa.com

(306) 922 1707

Councilor Don Cody

ward4@citypa.com

(306) 764-2177

August 13, 2023

URGENT AND IMPORTANT

Attention: Kelly Goyer, Director of Field Services.
Multi Material Stewardship Western.
401-333 3rd Avenue North.
Saskatoon, SK S7K 2M2

Sent Via email at kgoyer@multimaterialsw.ca and subsequent mail

Dear Mr. Goyer

Re: Extended Producer Responsibility Draft Plan Feedback

The City of Regina (City) is writing to Multi Material Stewardship Western (MMSW) to provide written feedback on its proposed draft Household Packaging and Paper Stewardship Program Plan (Program Plan) regarding the move to a full Extended Producer Responsibility (EPR) model for household packaging and paper within the province of Saskatchewan. The City provided feedback during the June 27, 2023 information session. This written feedback is to confirm some of the previous provided feedback and present some additional thoughts.

The City is supportive of the move towards a full EPR model as it shifts the responsibility for waste packaging and paper from municipalities and residents to the producers.

The following is our overall understanding of the transition plan as it would impact the City of Regina's current recycling program and our feedback is based on this understanding:

- Processing of recyclable materials will be managed by MMSW and is to be transitioned by July 1, 2024.
- Municipalities will have the option of remaining a collector for recyclable materials and would be presented with a Master Services Agreement (MSA) for the City to consider.
- Curbside collection services in larger municipalities is expected to transition by July 1 2024.
- Depot services will follow in phase 3 and be transitioned by July 1, 2026. Municipalities will continue to receive funding for these services until they have transitioned under the new agreement.
- Any MSA will have an incentive or funding component.

Upon further review, transitioning both collection and post collection services by July 1, 2024 might be optimistic. The transition may be easier and better managed by transitioning the post

collection services first and then the collection services a few months later in each phase. One of the most important aspects of this model is clearly defining the acceptable materials. From an outreach perspective, it is essential that the acceptable materials list is clearly defined before the transition occurs to allow outreach materials to be updated. The responsibility for outreach will be the responsibility of the collector which could change if the current collectors (municipalities) chose not to enter into an MSA. This could be more change management for residents including collection schedules changes, change to acceptable items (City curbside accepts glass and other items not accepted in other curbside programs) and where and how residents receive information about the recycling program to name a few of the program communication impacts. Having the opportunity stagger the transition for post processing services and collection services within each transition phase will allow longer lead times to review MSA's, obtain approvals as well as manage the changes for residents.

Another complication in Regina that may not be well understood is Regina's multi-family residences, defined as properties with more than four dwelling units or as designated by the City Manager, are not serviced by the municipality. Each multi-family property is mandated to provide garbage and recycling services to their residents. Most multi-family properties contract a private service provider for collection and post collection services. MMSW would need to coordinate with each multi-family property or multi-family service providers directly.

The transition timeline seems very optimistic taking into account municipal decision-making processes with various proposals requiring City Council approval. Municipalities have agreements with post collection companies currently that will need appropriate notice and wind down periods. Municipalities also, have collections contracts in place that maybe impacted by the proposed collections MSA. Any changes to current collection and post collection agreements and or entering into a MSA will most likely require Council approval. The minimum lead time for Council approval is three months but often can be longer.

The City appreciates the opportunities to provide feedback on the Proposed Household Packaging and Paper Stewardship Program Plan and would like to be included in further discussion as the plan is updated or approved.

Respectfully,

Derek Adam
A/Manager Program Development and Delivery

c: Kurtis Doney, A/Executive Director, Citizen Services
Janet Aird, A/Director, Water, Waste and Environment
Brie Bennett, Senior Waste Management Coordinator, Ministry of Environment

City of Saskatoon Response to Household Paper and Packaging Stewardship Program Plan

2023/08/11

[1] Introduction

The purpose of this document is to provide the City of Saskatoon's (City) detailed feedback and recommendations on the Multi-Material Stewardship Western's (MMSW) Household Paper and Packaging Stewardship Program Plan Draft. The City's response focuses on its requirements to deliver an effective and efficient residential recycling program, based on a solid understanding of the preferences, knowledge, and behaviour of our residents.

With that context, the City supports the newly adopted provincial regulations. However, the information provided in the program plan draft poses several questions and issues that will need to be addressed before the City is able to provide its overall support to a final program plan. More specifically, although the City supports the extended producer responsibility model, a fundamental consideration or principle in the transition into the new program is to ensure that it is not financially regressive to the City. As such, this document offers several recommendations and supporting rationale that aim to uphold this principle while fostering a seamless transition to the new program plan.

The subsequent recommendations and their supporting rationale are organized to follow the headings as presented in the June 13, 2023 Draft. For clarity, a summary of the recommendations is included in Appendix A.

[2] Recommendations and Rationale

Producer Responsibility Organization

Under section 2.3 Program Financing, the Draft Program Plan outlines the cost categories that are proposed to be covered. The City used these categories to structure its recommendations and rationale on this topic:

Category	City of Saskatoon Response	Explanatory Notes
Payments to Non-Transitioned Collectors	<p>Recommendation 1: <i>Ensure that the new program is beneficial or at the very least, not financially harmful to the City of Saskatoon / Municipalities until they are able to fully transition away from existing contracts.</i></p> <p>Recommendation 2: <i>When ready to implement, for municipalities with existing contracts that are unable to be amended without negative financial impacts, those municipalities receive 100% funding until existing contracts expire.</i></p>	<p><i>It is important to note that the current payments have covered less than 75% of the program costs; however, in recent years there have been regular increases that are closing the gap.</i></p>

Material Management for Transition Collectors	City supports MMSW taking full responsibility and cost for material management as long as the service transition is not financially harmful to the City of Saskatoon.	<i>Existing contracts and timing contribute to cost impacts. The City has 2 separate contracts with 2 different service providers for residential recycling, which include containers, collections, transportation, processing, and marketing materials.</i>
Program Management	City supports MMSW taking full responsibility and cost for program management as long as the service transition does not negatively impact the City of Saskatoon.	<i>The City can provide details on what is involved in managing our recycling programs and associated costs.</i>
Residential Awareness	Recommendation 3: <i>Monitor recycling education relative to program metrics to ensure that recycling education resources are adequate to maintain or improve current participation, contamination, and diversion rates.</i>	<i>At \$0.75 per household per year*, funding provided for resident awareness is substantially less than the City's recycling education budget in existing contracts. *Based on a verbal explanation from MMSW and verification from City financial team.</i>
System Improvements	City supports system improvements which encourage producer members to make choices that do not downcycle easily (such as use of HDPE #2 rather than #4 LDPE). Recommendation 4: <i>The final Program Plan to include a fee structure for producer members generating non-recyclable regulated materials that will see that material type move to being recyclable and/or disincentivizes the use of materials that are unacceptable.</i>	<i>While some verbal explanation was provided by MMSW on how this currently works and how it has been applied in British Columbia, an explicit inclusion in the final Program Plan would be helpful to demonstrate how it will meet the objectives of the regulations and move Saskatchewan to a more circular economy as discussed later in the Draft Program Plan.</i>

Section 2.3 of the Program Plan Draft also introduces the studies used to allocate program costs, which later are also referred to for setting payments for municipalities/collectors:

Recommendation 5: *Prepare waste composition studies that look at all streams of waste to determine not just contamination rates in recycling, but also program materials that are ending up in other streams, in particular organics and garbage and provide compensation for program materials that end up in these streams.*

Recommendation 6: *To ensure that there are no negative cost impacts to the City, provide annual cost impact studies that account for inflation, as inflationary pressures and market changes are creating significant cost pressures for municipalities operating waste programs.*

The Program Plan Draft infers that MMSW is in the same position as municipalities in Saskatchewan, having no tools to influence the paper and packaging that end up in the waste streams:

Recommendation 7: *MMSW, with their producer membership, takes a leadership role to influence waste stream decisions and this should be clearly demonstrated in the final Program Plan.*

Household Packaging and Paper Products

Packaging Like Products

The examples of “Packaging Like Products” include very specific material type as well as the function.

Recommendation 8: *Clarify the Program Plan to better understand materials included in the program in addition to the item’s function.*

For example only gift bags that are paper or whether all items with that function are included, gift bags regardless of material type?

Unacceptable Items

The proposed list of unacceptable items includes items from other stewardship programs. However, based on the City’s experience, many of these materials will be captured through the residential recycling program.

Recommendation 9: *Recommend developing Program Plan to ensure that other regulated materials are captured and not landfilled; demonstrate how MMSW will work with other organizations to optimize material recovery across stewardship programs.*

In section 3.5 of the Program Plan Draft, the sources of household packaging and paper products are discussed. Generally, the single-unit and multi-unit definitions align with the City’s programs. That said, this issue generated several questions for the City based on our waste program eligibility criteria and experience with complex property types, of which there are more of in urban areas, namely:

- Are mixed-use properties included, what about commercial at ground level and residential above?
- How are the variety of different types of vacation facilities listed in this section identified and excluded? Many of these types are properties are included in the City’s current program and/or are not actively being tracked.
- What is the threshold for residences where medical services are provided? Within each category provided there is a range of medical services provided.
- What about home-based businesses? In the City, these are eligible for residential use; however, they are responsible for excess collections.

The City strongly prefers Program eligibility for residential recycling collection that aligns with eligibility for garbage and organics collection. This makes it easier for residents to receive services as well as for both the City and MMSW to administer. This is an area that has and continues to undergo significant work as the City introduces organics

collection and moves to variable rate garbage. When this response was prepared, the City is hiring an eligibility analyst to address these questions consistently across all waste streams.

Recommendation 10: Program eligibility for residential recycling collection aligns with eligibility for garbage and organics collection.

Program Design Phases

Program Materials

The City agrees that a first step in the program design should be establishing the accepted materials. While the Program Plan draft identifies some “targeted” materials for each phase, the final Program Plan should provide more certainty about the materials that will be accepted. From the examples provided, there are some materials that the City currently do not accept that are proposed to be collected, such non-beverage polycoated cartons and tubs. The addition of materials would be supported by our residents, who have stated during engagement and surveys, that they would like to see the recycling program accept more items. Similarly, the inclusion of flexible plastics and foam packaging in a depot model would be an expansion of our current program and supported by residents. See Recommendation 81.

Household Glass

Household glass remains an item of concern. While the City recognizes the challenges of glass in a collection-based program, it is an item the City currently accepts. Residents will not be supportive of the removal of materials from their blue carts/bins. If this is the approach taken, the City strongly encourages that MMSW partner on the SARCAN household glass depot program until such as time that the MMSW depot program is prepared to accept household glass. While this will not mitigate all residential dissatisfaction with the removal of an material, it would provide residents a viable option until the new depot program is operational.

Recommendation 11: If the program is not accepting household glass at the outset, MMSW partners on the SARCAN household glass depot program until such as time that the MMSW depot program is prepared to accept household glass.

Compostable Plastics

The exclusion of compostable plastics in the Program Plan Draft is something the City would like MMSW to reconsider. The City has been closely watching the Federal Government’s plan to introduce regulations for compostability labeling. If the end result is labeling that confirms compostability in Canadian facilities and can only be used when meeting that standard, the City is likely to expand the list of acceptable materials in our green cart program. Under these conditions, MMSW should similarly plan to re-evaluate their plans for including compostable plastics. In the interim, the final Program Plan should identify compostable plastics as an item that will be the focus of system improvements.

¹ Recommendation 8: Clarify the Program Plan to better understand materials included in the program in addition to the item’s function.

Recommendation 12: *The final Program Plan identifies compostable plastics as an item that will be the focus of “system improvements”. When Federal regulatory standards require compliance and labeling for compostability in Canadian facilities, MMSW should plan to re-evaluate their plan and include compostable plastics in the program.*

Collection Services

The City supports the collaboration with municipalities on collection schedules, cart placement, assisted collections, and customer service procedures. As noted in our meeting, assisted collections is a human right, and therefore, a mandatory service to provide when offering curbside collections. Adding to the list, the City would like to see collaboration for emergency/weather events and resident complaints/escalated concerns beyond basic customer service procedures.

Recommendation 13: *Collaborate with municipalities on collection schedules, cart placement, assisted collections, and customer service procedures.*

Recommendation 14: *Assisted collections is a human right, and therefore, a mandatory service to provide when offering curbside collections.*

Recommendation 15: *Collaborate with municipality for emergency/weather events and resident complaints/escalated concerns beyond basic customer service procedures.*

Incentives and Program Efficiency

In section 4.2.5 of the Program Plan Draft, financial incentives are discussed. As noted during our meeting, the City has many questions about what is included in MMSW's definition of an “effective and efficient program” as well as what can be expected with “collection incentives”. While the City understands that this will not be determined until a later phase, based on the Program Plan Draft provided, these are key areas where we expect the City's current program and MMSW's definitions may not align. The City encourages MMSW to take the time to understand that operating a residential recycling program in large urban areas is different than in other parts of Saskatchewan. We face a number of unique challenges due to the scale of our program and the diversity of our community that do require additional resources to operate. The City can provide these details to MMSW at the appropriate time.

MMSW Acting as the Processor and Marketer in Phase 1

In the engagement session with MMSW, it was stated that MMSW intends to handle the processing and marketing of material in Phase 1 and will enter into a Master Services Agreement and Statement of Work with the City to remain as the collector. If this is the intent of Phase 1, it should be stated within the plan document, as it currently reads “MMSW will assume full financial and operational control of the collection, transportation, receiving, processing and marketing of PPP collected under this phase”.

Recommendation 16: *Clarify MMSW's role in the Plan document, that MMSW intends to handle the processing and marketing of material in Phase 1 and will enter into a Master Services Agreement and Statement of Work with municipalities to remain as the collector.*

Contract Status - Curbside Residential and Multi-Unit Residential

The City currently contracts the curbside and multi-unit collection and processing of recycling. Loraas Disposal North Ltd. has the contract for collection, processing, and marketing services for the City's curbside residential recycling program. This contract covers the 74,000 plus service addresses in Saskatoon that represent our single-family dwellings. The City pays Loraas approximately \$5,800,000 per year under this contract. The term of this Agreement is from January 1, 2020 until December 31, 2028. In other words, it has a term of 8 years with approximately 4.5 years remaining as of June 30, 2023. The Agreement does not separate collections from processing and marketing. Instead, all three functions are contracted to Loraas. The City could not simply remove processing and marketing from the contract without the consent of Loraas and a negotiation of a change to the Agreement. The Agreement cannot be terminated early. There is likely to be a significant cost with respect to negotiating any change to the Agreement. Any discussions about assigning a portion of the Agreement to another party would also need to involve Loraas.

Cosmopolitan Industries (Cosmo) has the contract to provide recycling services for multi-unit residential properties. This Agreement covers approximately 900 multi-unit residential properties (39,700 units) in Saskatoon. The City approximately pays Cosmo \$3,000,000 per year under this contract. This Agreement does not end until December 31, 2029. Like the curbside contract, the Agreement does not separate collections from processing and marketing, all three functions are contracted to Cosmo. The removal of marketing and processing from the collection of materials would need to be negotiated and consented upon with Cosmo. Cosmo sub-contracts out the collection portion of this Agreement to Emterra and is most interested in the processing portion of the Agreement. This Agreement does have a termination provision, and any termination would require a termination payment to Cosmo. The amount of these payments are pro-rated and diminish as the contract continues. At this point, in the term of the Agreement, a termination payment would be a significant cost. This Agreement does allow the City to assign the Agreement to the Province of Saskatchewan or any agency of the Province of Saskatchewan or as may be required to comply with applicable law.

Within the plan document, it states "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". The plan document outlines timelines, and payments to non-transitioned communities would end in 2027, assuming a 2024 Phase 1 implementation. During the engagement session, MMSW also stated that non-transitioned communities would cease to receive funding at an earlier date than 2027. If that is the intent, it should clearly be stated in the program plan.

From the information in the program plan document and information received during the engagement sessions, the City finds itself deciding between two scenarios:

- MMSW becomes the processor and marketer of the material and the City remains as the collector. As stated above, the contracts for recycling will either be renegotiated or terminated. If contracts are renegotiated, it will most likely result in

higher rates that would not be reflected in the 2021 cost study that determines incentives.

- The City determines that the associated penalties with renegotiating contracts are not worth the incentives provided by MMSW and does not transition into the program. The program funding will be cut off, and the City of Saskatoon will cease to receive payments from MMSW.

One of the objectives of the Household Packaging and Paper Stewardship Program Regulations (HPPSPR) is to make producers responsible for all costs associated with recycling. In either of the scenarios above, the City finds itself exposed to financial risk from the new program. Due to the contrast between the objective of the regulation and the issues associated with the current program plan, it is strongly recommended that MMSW reevaluates their approach to transitioning into the new EPR program. See Recommendation 1².

The Statement of Work and Master Service agreement are two critical documents that were not available for review. These documents contain essential details for the City to fully understand the program, including service levels, payment structure, overhead costs, and contamination penalties. In the absence of these documents, it is difficult for the City to ascertain the efficacy of the plan, as the majority of operational and financial concerns will be addressed in these agreements.

The plan document states that non transitioned municipalities will only receive 75% of program funding. The City is committed to transitioning into this program, but it is not currently feasible with existing contracts in place. For the transition period, we are requesting that MMSW considers providing 100% program funding to municipalities until the expiration of existing contracts. This provides both minimal disruption to existing recycling services and makes the producer responsible for recycling costs, both objectives of the HSPPR. And as far as we can see, this causes no harm to the producers, as they would be providing 100% program funding to transitioned municipalities. In contrast, municipalities that are unable to amend contracts are being penalized, as 25% of program funding will not be received for issues beyond their control. See Recommendation 2³.

Another alternative not discussed by MMSW in the plan or engagement sessions, is taking over the existing contracts from both our multi-unit and curbside operation. MMSW has stated that they want to have full operational and financial controls of the recycling programs, and this is one way that this goal can be achieved. This would also address the potential issue that a municipality does not want to be a collector in the program, as the details contained in the Statement of Work and Master Services Agreement are unknown.

² Recommendation 1: Ensure that the new program is beneficial or at the very least, not financially harmful to the City of Saskatoon / Municipalities until they are able to fully transition away from existing contracts

³ Recommendation 2: When ready to implement, for municipalities with existing contracts that are unable to be amended without negative financial impacts, those municipalities receive 100% until existing contracts expire

Phase 2 and Phase 3 Design

The City suggests that MMSW reconsider the order of the phasing. It may be more straightforward to transition smaller jurisdictions or fill in gaps where recycling does not exist than to transition larger urban municipalities with complex contracts and needs. Alternatively, a longer timeline for Phase 1 is recommended if the order cannot be changed. Based on recent contract negotiations, the City does not see these timelines as feasible for our participation or the benefit of our residents. The City also would like the option to separately address curbside and multi-unit recycling transitions, as these are separate contracts.

The timing for depots would also benefit from adjustment on timing and scope from the City's perspective. Depots that provide options for excess materials, that same as collection, are a core service for our residents, who routinely have extra materials, particularly around the holidays. This part of the depot program should be timed to coincide with collections. The depot approach for other materials, that will not be included in collections, is appropriate to come later. However, the City would like to note that we do have a new Material Recovery Facility that is a staffed transfer station. It currently has capacity and may be an opportunity to pilot or go early with new depot items. The City has an additional 3 unstaffed depots that accept the same items as our curbside and multi-unit recycling programs, only one that is gated at night. The City plans to undertake a review of these depots and would appreciate an indication as early as feasible whether these existing depots or the City will have any role in MMSW's depot plans.

Resident Communications

Communications and education are important to our recycling programs success. A full education and communication plan and budget can be provided if requested. The current payments from MMSW do not cover our full education and communications costs. If contamination or capture rate targets, which in part require resident knowledge and behavior change from residents (in addition to better packaging design and labeling), are a component of this final Program Plan, then municipalities/collections require adequate resources for education and communications instead of reduced budgets. The proposed assistance that was discussed during our meeting will not go far enough. There may be an opportunity to work with the larger cities, like Saskatoon, that have a robust education and communications toolkit and branding to share these with other jurisdictions, rather than developing materials from scratch. See Recommendation 4⁴.

Thank you for providing the opportunity to provide feedback on the Household Packaging and Paper Stewardship Plan, and we look forward to working with MMSW in the future on the extended producer responsibility program.

⁴ Recommendation 4: Monitor recycling education relative to program metrics to ensure that recycling education resources are adequate to maintain or improve current participation, contamination, and diversion rates.

Appendix A – Summary of Recommendations

- Recommendation 1:** *Ensure that the new program is beneficial or at the very least, not financially harmful to the City of Saskatoon / Municipalities until they are able to fully transition away from existing contracts.*
- Recommendation 2:** *When ready to implement, for municipalities with existing contracts that are unable to be amended without negative financial impacts, those municipalities receive 100% funding until existing contracts expire.*
- Recommendation 3:** *Monitor recycling education relative to program metrics to ensure that recycling education resources are adequate to maintain or improve current participation, contamination, and diversion rates.*
- Recommendation 4:** *The final Program Plan to include a fee structure for producer members generating non-recyclable regulated materials that will see that material type move to being recyclable and/or disincentivizes the use of materials that are unacceptable.*
- Recommendation 5:** *Prepare waste composition studies that look at all streams of waste to determine not just contamination rates in recycling, but also program materials that are ending up in other streams, in particular, organics and garbage, and provide compensation for program materials that end up in these streams.*
- Recommendation 6:** *To ensure that there are no negative cost impacts to the City, provide annual cost impact studies that account for inflation, as inflationary pressures and market changes are creating significant cost pressures for municipalities operating waste programs.*
- Recommendation 7:** *MMSW, with their producer membership, takes a leadership role to influence waste stream decisions and this should be clearly demonstrated in the final Program Plan.*
- Recommendation 8:** *Clarify the Program Plan to better understand materials included in the program in addition to the item's function.*
- Recommendation 9:** *Recommend developing Program Plan to ensure that other regulated materials are captured and not landfilled; demonstrate how MMSW will work with other organizations to optimize material recovery across stewardship programs.*
- Recommendation 10:** *Program eligibility for residential recycling collection to align with eligibility for garbage and organics collection.*
- Recommendation 11:** *If the program is not accepting household glass at the outset, MMSW partners on the SARCAN household glass depot program until such as time that the MMSW depot program is prepared to accept household glass.*

Recommendation 12: *The final Program Plan identifies compostable plastics as an item that will be the focus of “system improvements”. When Federal regulatory standards require compliance and labeling for compostability in Canadian facilities, MMSW should plan to re-evaluate their plan and include compostable plastics in the program.*

Recommendation 13: *Collaborate with municipalities on collection schedules, cart placement, assisted collections, and customer service procedures*

Recommendation 14: *Assisted collections is a human right and therefore a mandatory service to provide when offering curbside collections*

Recommendation 15: *Collaborate with municipality for emergency/weather events and resident complaints/escalated concerns beyond basic customer service procedures.*

Recommendation 16: *Clarify MMSW’s role in the Plan document, that MMSW intends to handle the processing and marketing of material in Phase 1 and will enter into a Master Services Agreement and Statement of Work with the City to remain as the collector.*

Kelly Goyer

From: Lyndon Hicks <lhicks@yorkton.ca>
Sent: Thursday, August 3, 2023 2:00 PM
To: Kelly Goyer; Ann Danilevich; MMSW Info
Cc: Aleks Hoeber; Sandra Bilan; Val Fatteicher; Aron Hershmillier
Subject: RE: MMSW Draft Program Plan Consultation Resources

CAUTION: This email originated from outside of the organization.

Hello Kelly and Ann,

Thanks again for the MMSW consultation discussion. We appreciated the opportunity to converse, ask questions and voice our thoughts/concerns pertaining to the upcoming changes! During the chat we were asked to provide some written feedback pertaining to our thoughts/considerations moving forward... we've attempted to do this below!

Yorkton has a truly special model for recycling services that we're proud of! It's a fantastic three-way partnership between Prairie Harvest Employment Program (collection), SaskAbilities (post collection), and the City of Yorkton (funder). The best part is, this model focuses on the triple bottom line, taking into account the social, economic, and environmental impact. It creates valuable job opportunities for youth at risk and individuals experiencing disabilities or health conditions.

The proposed plan by MMSW wasn't entirely clear on how it would bring about social impact alongside environmental benefits. While we understand the importance of effectiveness and efficiency, we believe in the value of our current model. It may not be the most labor-efficient, but it brings about tremendous social returns and is cost-effective for all our city residents.

When we look at our model and the plan's timelines, we do have some concerns. We believe it would take much longer than six months to fully wind down the service. Currently, the recycling depot location also handles Household Hazardous Waste Depot, Compost/Organics Collection, Eco Oil Centre, and "two doors down," the SARCAN depot. All these fantastic recycling services are operated by SaskAbilities.

Additionally, the City of Yorkton has made significant investments in capital purchases, including a scale, a baler, a sort line, and building improvements, which we believe will have a long-term positive impact on the community.

During the stakeholder engagement session, we were eager to explore how SaskAbilities could stay relevant and significant, and we're glad that our current model was well-received. It's all about investing in the people of our community, creating local jobs for those marginalized in society, and offering residents the opportunity to support two non-profits indirectly through recycling. Our partnership is truly unique and strong, and we've proudly maintained it for many years. The community values it greatly, providing a cost-efficient, one-stop option for recycling various types of products. The Environmental Committee, consisting of city staff members, local business owners, residents, and city councillors, oversees the work and wholeheartedly supports it.

Again we appreciate the opportunity to provide feedback. We encourage your team to reach out to us if you have any questions or we can help in any way.

Thanks again, have a great long weekend everyone.

Lyndon

Lyndon Hicks, PAg.

Solid Waste and Environmental Programs Manager

Box 400, 9 Queen Street West

Yorkton, SK. S3N 2W3

Ph: 306.786.1775

Fax: 306.786-6880

www.yorkton.ca | LHicks@yorkton.ca



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From: Kelly Goyer <kgoyer@multimaterialsw.ca>

Sent: Friday, July 14, 2023 9:53 AM

To: Sandra Bilan <sbilan@saskabilities.ca>; Lyndon Hicks <lhicks@yorkton.ca>; Val Fatteicher <VFatteicher@yorkton.ca>; Aron Hershmillier <ahershmillier@yorkton.ca>; Aleks Hoeber <ahoeber@saskabilities.ca>

Cc: Ann Danilevich <adanilevich@multimaterialsw.ca>

Subject: MMSW Draft Program Plan Consultation Resources

CAUTION: External Email

Thank you again for such a forthright and helpful discussion yesterday. Below please find the link to our consultation web page where you will find timelines for our consultation phase, past recordings of presentations given to specific stakeholder groups and a link to the draft program plan itself. As discussed yesterday, we look forward to receiving additional feedback from you regarding the details of your concerns over implementation timelines (ie. 6 mos.) as well as any additional input you may wish to provide.

<https://www.mmsk.ca/consultation/>

With kindest regards and appreciation,

Kelly G. Goyer

Director, Field Services

Multi-Material Stewardship Western (MMSW) | 401 – 333 3rd Ave. North, Saskatoon, SK S7K 2M2
T: 306-500-6172 Ext. 503 | C: 306-370-6407 | kgoyer@multimaterialsw.ca | www.mmsk.ca



August 13, 2023

Submitted via email: info@multimaterialsw.ca

Multi-Material Stewardship Western (MMSW)
401-333 3rd Avenue North
Saskatoon, SK S7K 2M2

Re: Household Packaging and Paper Stewardship Program Plan – draft

On behalf of Food, Health & Consumer Products of Canada (FHCP) and our members, I am pleased to respond to Multi-Material Stewardship Western (MMSW)'s draft Household Packaging and Paper Stewardship Program Plan (the Plan).

FHCP is the largest national industry association representing companies that manufacture and distribute the majority of everyday products found in every Canadian household.

Our sector employs over 350,000 people in nearly 10,000 facilities across Canada. Our members transform Canada's agricultural riches into value-added finished goods that feed families at home and worldwide. They make safe over-the-counter (OTC) medications and natural health products (NHPs) that empower Canadians to practice self-care while relieving pressure on the healthcare system. Consumers have trusted FHCP members' brands for more than a century.

FHCP Leadership in Sustainability

FHCP works collaboratively with members, partners and governments on regulatory and policy frameworks as well as voluntary initiatives to lead to a circular economy for plastics. In 2019 FHCP became the first trade association in Canada to endorse the Ellen MacArthur Foundation's common vision for a New Plastics Economy¹, envisioning a world where plastic never becomes waste. This builds on the leadership of our members, many of whom have made global commitments to ensure their packaging is fully re-useable, recyclable or compostable, and re-used, recycled or composted in practice at end of life. Many of our members are also adopting the Golden Design Rules for Plastic Packaging, launched in 2021 by the Consumer Goods Forum². FHCP is also a founding partner in the Canada Plastics Pact³, working on Canadian specific solutions to the global issue of plastics, and in 2021 FHCP endorsed the Global Self-Care Federation's charter for environmentally sustainable self-care⁴.

Across Canada our members hold financial and/or operational obligations in various provinces for the delivery of residential or curbside recycling programs for packaging sold to consumers, and are engaged in policy discussions as more provinces look to introduce or transition to full Extended Producer Responsibility (EPR).

¹ <https://ellenmacarthurfoundation.org>

² <https://www.theconsumergoodsforum.com/environmental-sustainability/plastic-waste/key-projects/packaging-design>

³ <https://plasticspact.ca>

⁴ <https://www.selfcarefederation.org/environmental-charter-launch-landing>

To help our members meet their obligations under provincial EPR programs for packaging and to improve interprovincial alignment in 2021 FHCP supported the launch of Circular Materials⁵, Canada's only industry-led, not-for-profit, multi-jurisdiction Producer Responsibility Organization (PRO) focused on packaging.

Introduction of Extended Producer Responsibility in Saskatchewan

The publication earlier this year of the Household Packaging and Paper Stewardship Program Regulations⁶ under the Environmental Management and Protection Act⁷ and the accompanying Product Stewardship Program Development Guidelines⁸ (the Guidelines) provide an important opportunity to introduce Extended Producer Responsibility for packaging, packaging-like products and paper products (PPP). This transition away from a traditional stewardship model to a full EPR model presents an opportunity for the producer community to establish a province-wide harmonized model to benefit residents of Saskatchewan and improve environmental outcomes while identifying opportunities for both innovations and efficiencies.

Throughout our engagement in EPR policy and program design and delivery across the country FHCP efforts are focused on improved environmental outcomes while also ensuring Canada remains a competitive environment in which companies can innovate, grow and create jobs. FHCP encourages all Canadian jurisdictions to work toward enhanced interjurisdictional alignment of regulatory design, and we have worked with PROs to improve interprovincial alignment within program plans. This includes governance, producer registration and reporting, fee setting and public reporting on program performance.

As the national landscape of EPR unfolds the regulatory and cost obligations on industry are rapidly escalating, even more so when the federal plastics agenda is taken into account. It is imperative that industry take every opportunity to find efficiencies and best utilize our limited collective resources. To that end FHCP supports the ongoing dialogue within industry to consider opportunities for the national integration of PROs and PRO services while maintaining the opportunity for local producers to be engaged in a meaningful way and for local concerns to be addressed.

The Saskatchewan regulation includes tight timeframes for the submission of a program plan and **FHCP urges all parties to the consideration of national integration to expedite those discussions**, and for MMSW to request more time from the ministry if required. The regulation provides a natural point for a new path forward together.

The Plan

Following are some reflections and recommendations to clarify and strengthen the Plan.

⁵ www.circularmaterials.ca

⁶ <https://publications.saskatchewan.ca/#/products/120592>

⁷ <https://publications.saskatchewan.ca/#/products/31893>

⁸ <https://www.saskatchewan.ca/residents/environment-public-health-and-safety/saskatchewan-waste-management/household-packaging-and-paper-recycling>

2.2.2 Membership in MMSW

The plan indicates that “(p)roducer members are invited to participate in an Annual Steward Meeting to review the program’s results for the previous year, any changes to the program’s fee methodology and the budgets and fee rates for the coming calendar year.” This was entirely appropriate when MMSW acted as an industry funding organization under a traditional stewardship program. However, under EPR members should have the right to be meaningfully engaged in consideration of policy or program changes that will directly impact cost, obligations or practices.

We encourage further consideration of the role of members under an EPR model.

3.2 Packaging

Although certified compostables are a sub-set of bioplastics FHCP views them as distinct categories of materials and recommends they be treated separately.

FHCP encourages further consideration and specific detail concerning bioplastics as a packaging material. Certified compostables have been through testing and verification. Bioplastics, despite incorporation in the regulation and definition in the Guidelines remains an overly broad term. It is not clear what is included within the definition of bioplastics, nor the purpose for the inclusion as a separate packaging material. Like certified compostables, bioplastics that are already in the market are currently reported to MMSW simply as either rigid or flexible plastics. These products are being collected through either the recycling or compost streams and should have fees attributed to them to compensate the system for costs of collection and processing as well as determining the end of life outcomes and best path to management.

3.3 Packaging-like products

Greater clarity should be included in the Plan to identify packaging-like products as “ordinarily disposed of after a single-use or short term use refers to products that are used or re-used typically less than five years”. This is in line with the ministry Guidelines but adds additional clarity for readers of the Plan.

5.1 Waste Management Hierarchy

Although the Plan includes a waste management hierarchy it is not aligned with the waste management hierarchy articulated in the Guidelines. FHCP recommends replacing the hierarchy to mirror the Guidelines, as follows:

- Reduce – reducing the amount of material used to produce the packaging and paper product or redesign the packaging or paper product to improve recyclability.
- Reuse – developing durable, reusable alternatives.
- Recycle – defined in Section 2 as household packaging and paper products collected by a PSP 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.
- Recover – includes recovering material or energy from the household packaging and paper product.
- Dispose – includes disposing of the waste from the household packaging and paper product in a landfill.

Other

Throughout the Plan MMSW indicates that additional details cannot be determined until approval of the Plan is granted. This presents a case where a number of elements typically in a program plan are not

outlined. FHCP recommends consideration of seeking approval for the plan from the government with additional approvals on each stage of the plan as more details are considered and details confirmed.

- As written the Plan currently lacks clarity on identifying the criteria for “eligible municipalities”. Based on experience in other jurisdictions eligibility may be based on population or existing residential recycling services, and transition phases may consider the natural termination of existing service contracts or geographic catchments. Like producers, municipalities require as much certainty and time to prepare for transition as possible.
- It is proposed that performance targets will not be established until after the commencement of phase III of the Plan. This is generally consistent with other program plans in other jurisdictions as EPR for packaging is introduced. Targets should be ambitious and progressive but achievable when supported by strong procurement practices and service delivery, promotion and education and consideration is given to eco-modulated producer fees that incentivize packaging innovation.
- Throughout continued development of future phases of the Plan FHCP encourages consideration of ensuring producers have access to the materials they place in the market. Producers who pay for the collection and management of materials should have access to those materials to achieve corporate commitments and comply with anticipated federal requirements for recycled content in plastic packaging.
- The plan should include a commitment to financial prudence, while establishing stable reserves, and fairness of fees to all obligated producers who place obligated materials in the market.
- The Plan identifies materials that will be accepted in phases I and II, while others will be collected in phase III. FHCP recommends fees apply to all obligated producers and all obligated materials in all phases of the Plan. By collecting these fees, particularly for materials that are currently already being collected in the province, will compensate for the cost of sorting these items that are collected and to undertaking studies or piloting new collection or processing methods so these items can be successfully managed by phase III.

FHCP supports the introduction of EPR for packaging in Saskatchewan. This provides opportunities for greater interprovincial alignment of policies and practices, scales of efficiencies, access to regional assets and the potential for interprovincial collaborations on technological solutions, clarity and ease of use for residents and improved environmental outcomes. We are committed to working together to ensure a successful transition to meet the intent and requirements of the Regulation and achieve industry's collective commitment to a circular economy.

To ensure certainty for producers, government and all stakeholders, we urge continued focus on the consideration of national integration of industry resources and talents.

Please consider FHCP a resource.

Sincerely,



Michelle Saunders
Vice President, Sustainability



August 10, 2023

**RE: MMSW Stakeholder Feed Back
Household Packaging and Paper Stewardship Program Plan_("Program Plan")**

Hello,

In keeping with the goals and deadline of the PPP, I hereby submit my feedback, regarding the draft proposal.

After carefully reviewing the outline, meeting and speaking with Kelly Goyer, Field Supervisor on several occasions, and participating in the on-line presentations, I have concluded that my business does not fall into the guidelines of the Program – specifically with respect to **2.2 Producer Members**, (generate \$1 Million Gross Revenue) and **Plan 9 (b)** exempt - since our containers are part of an operating reuse system. Therefore, I wish to be excluded from the membership, until such time that I qualify.

However, I will give you my input, and I do hope that my comments will be considered and I do believe that the program will benefit from a simple common-sense approach, which seems to be lacking whenever bureaucrats and politician begin to “talk” about what needs to be done to correct problems.

As usual whenever bureaucrats and politicians start inventing new laws, the result is another form a “Tax” that will be imposed, and in this case on it will be the to the manufacturers and producers and finally in the end - the consumers.

Case in point – plastic bags have now been banned in retail outlets (which IS the right thing to do), however this has resulted in retailers now having to add additional cost to the consumer costs. This is a boost to the retailer sales, which will certainly increase their profits – but it is also an increase in GST and PST that is charged to the consumer and that sits quite well with the governments, but the real loser is the consumer.

The concept of the EPR is simply a “Tax on a Tax” and the at the end of the day, it’s the taxpayer who “flips the bill”, so that government employees, politicians and management and staff of the various Stewardship Recycling Programs can operate so that their management and staff can continue to be paid and employed. This is the foundation of all government programs.

Now the only, positive element of the Program relates to **4.2.5 Collection Incentives.**”

The MMSW post-collection network 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.

Is this “smoke and mirrors” and how much will the MMSW seriously “invest” in all these issues?
I will anxiously remain to see the results.

The 2 areas that the MMSW has not focused on is **Curbside Recycling and Beverage Container Redemption Depots**. Both have been failing miserably, since they were first implemented and managed by Saskatchewan Recycling Council in 1991.

Curbside MRF Collectors.

- Since 1986 when they were first introduced in Kitchener Ontario, they are basically haulers of waste and operate an unsustainable weekly service that continues to cost more every year and even more when increasing fuel service charges are imposed on a municipality. The more that they charge the municipality – the more that it costs the taxpayer. Ask yourself – when’s the last time a municipality reduced taxes?
- Current Single-Stream recycling methods have been failing ever since China stopped accepting the garbage that MRF’s were sending to them.
- Now that this stopped – it is the municipalities who must suffer and pass on the expense to the taxpayer.
- Curbside recycle recyclers do not care about sustainability and a circular economy. The massive diesel guzzling trucks that roar through the community on a weekly basis, are unsustainable expensive to maintain and operate.
- Despite all the expensive conveyor systems, robotic scanning devices, and bailing equipment they still on average, only retrieve and repurpose less than 10% of what is collected in the curbside bins.
- The costs of trucking the good material to reprocessing facilities is more expensive than the material is worth.
- Their basic incentive is to charge as much as possible to pick up – and charge as much as possible to haul and dump.
- Smaller companies are gobbled up by large US corporations.
- We are all effected by this and continue to do the same thing “over and over” ...

I have a developed solutions to these problems, but no one who should care - wants to listen. I have written letters to the Prime Minister, 3 different Federal Environment Ministers, 43 Provincial Environment Ministers, Opposition Ministers, SARM members, SUMA members individual municipalities and I am still waiting to hear from someone who really cares. What a SHAME.

SARCAN DEPOTS

- According to the managing director, a SARCAN Depot collects on average 400 single-use plastic bags - DAILY - at a location. That’s 2,400 bags per week, x 71 locations = 170,400 per week x 52 weeks = 8.86 million bags per year that end up in our municipal landfills. That’s disgusting and it is unbelievable that all members of the SWRC allow this to continue in every community in Saskatchewan.
- SARCAN does do well with the 80% recovery - but why wouldn’t they? Most of us want the deposit money that we have paid for at retail.
- However, we are not returned the GST that is collected, nor are we reimbursed for the cost of paying for single use plastic bags, the cost of fuel and wear and tear to get the returns to the depot and the time that it takes to wait in line for a very inefficient method of counting and sorting.
- SARCAN is also affected by the high cost of transporting the recyclable containers to the re-processors who are thousands of miles away from Saskatchewan.
- When it’s all said and done - Ask yourself – Is this a truly sustainable practice?
- Is Environment Saskatchewan meeting their obligations to the taxpayers of Saskatchewan?
- We are all effected by this and continue to do the same thing “over and over” ...

3.

I have developed solutions to these problems, but no one who should care - wants to listen. I have consulted with 3 Provincial Environment Ministers over the past 5 years (they change like the wind) and made presentations to the Management and Director at SARCAN, but they refuse to sit down and discuss what I have developed, for what ever reasons. Ask them.

Ever since the CCEM was instituted 1964 <https://ccme.ca/en/about> the Environment Minsters have been “spinning their wheels” and “talking” and “trying” to figure out ways to reduce the amount of unnecessary plastic waste that is plugging up our landfills – costing the taxpayer millions of dollars. The biggest hurdle is that they rely on the advice of the bureaucrats with the same advice “over and over” ...

Now, the Environment Ministers have announced the goal of “*Net Zero Plastic by 2030*”. Sadly, if we continue in the manner that we have, this goal will never be achieved. Regardless of the time spent on re-inventing the Saskatchewan’s version of the EPR. The jury is still out - how successfully it is working out in British Columbia?

One of my most influential mentors is Albert Einstein. Some people believe that it is he who so appropriately defined “INSANITY” – “Doing the same thing over and over expecting different results”.

My name is Harold Sokyka and I am an Innovator from Saskatoon who has spent the past 5 years developing the “*Kwik-BagIt Closed-Loop Rewards Recycling System*” which is successfully retrieving over 80% of valuable post-consumer plastic that is collected in households and businesses. The KBI System WORKS and materials collected is free of contamination and co-mingling of materials before it is placed into the curbside which results in better quality paper/cardboard stock and will divert millions of tons of plastic that currently ends up in the municipal landfills.

The KBI Bag has been implemented by www.cans4cosmo.ca for the past 2 years, and their program has resulted in successfully diverting over 8,400 single-use plastic bags from the landfill, and the roughly 500 members in their door-door program are still using the original Kwik BagIt Reusable, washable Recycling bags. Can you only imagine the success that we would have if every household and business in the province was using a Kwik BagIt?

The KBI Bag is the foundation to the patent pending process that I have develop which will help to solve all the problems mentioned above, and it will create “*newfound revenue*” that will remain in Saskatchewan and that can be shared by all stakeholders to improve our quality of life and to help to Achieve Net Zero Plastic by 2030.

Please visit click on this link <https://www.youtube.com/watch?v=L5K2H7hecVQ> to get a 5-minute overview. Also visit www.bestwaytorecycle.com and reach out to me any time – my phone is always answered and my emails are always returned.

Best Regards



Harold Sokyka CEO/Founder

Best Way Recycling and Consulting.
(div. of Kwik BagIt Products International Inc.) Cell 1(306)717-3895. WA+1 3067173895
<https://www.bestwaytorecycle.com/pages/about-us>
<https://www.linkedin.com/in/harold-sokyka-37366590/>

Award-Winning Patented Inventor for contributions to the Environment
Queen Elizabeth II Platinum Jubilee Medal (Saskatchewan) Recipient
<https://www.tinyurl.com/y63n554j>
(div. of Kwik BagIt Products International Inc.) Cell 1(306)717-3895. WA+1 3067173895
<https://www.bestwaytorecycle.com>

August 11, 2023

Multi-Material Stewardship Western (MMSW)
401-333 3rd Avenue North
Saskatoon, SK
S7K 2M2

Submitted via: info@multimaterialsw.ca

Re: RCC's Response to MMSW's Draft Household Packaging and Paper Stewardship Program Plan

Dear MMSW,

On behalf of Retail Council of Canada (RCC) and our members operating in Saskatchewan, we would like to thank Multi-Material Stewardship Western (MMSW) for giving producers the opportunity to comment on the draft Household Packaging and Paper Stewardship Program Plan.

RCC members represent more than two thirds of retail sales across Saskatchewan, and with one in every ten jobs in the province retail, benefit from the talents of over 73,500 Saskatchewanians working in more than 4,800 stores across the province. RCC is a not-for-profit, industry-funded association, and as the Voice of Retail™ represents small, medium and large retail businesses of every format, who collectively make up the majority of obligated producers in most EPR programs.

RCC and our members recognize there are many opportunities when it comes to full extended producer responsibility (EPR), including a consistent list of designated materials across the province, the creation of economies of scale to promote diversion, and increased material value and sustainable packaging innovation. Therefore, we support MMSW's program plan but would like to flag a few areas where further clarity and plan development would be beneficial for stakeholders and ultimately, help support plan approval by government.

Division of roles between MMSW and Circular Materials

During the Producer and Producer Association Virtual Session on July 4, as well as other sessions, we understand there were many questions related to the relationship and division of roles between MMSW and Circular Materials. To help alleviate stakeholder confusion and bolster confidence in the transition, we would recommend providing further clarity on how this relationship will be structured in the future, including clarity on roles and responsibilities. RCC and the majority of our members strongly support a harmonized approach to EPR across the country via a national PRO with full-service offerings. Therefore, we encourage MMSW to continue to have discussions with Circular Materials on opportunities for PRO integration.

To achieve this objective, should MMSW or Circular Materials find it beneficial for RCC to **advocate for an extension** of 30-60 days beyond the government's current September 27, 2023 plan submission deadline, we would be pleased to take this action in support of greater forward looking clarity.

Performance targets

While we understand the importance of having comprehensive data to help inform ambitious yet achievable performance targets, we are concerned the current plan will not receive government approval, as is, given the specific target requirements laid out in the regulation. These include targets for overall program recycling rate, overall program diversion rate, recycling rate by PPP category and diversion rate by PPP category. Based on our discussions with government, we anticipate they will want targets in all four areas in the initial program plan to demonstrate compliance with the regulation. Our recommendation in the immediate term is therefore to engage with the province and municipalities to leverage existing data and source new data in order to build an initial baseline for eventual target-setting. At the very least, we would suggest that a timeline be set to revert back to the province with proposed targets.

Coverage of remote and First Nation communities

Recognizing the unique challenges posed by collecting and transporting materials from remote and First Nation communities, it is RCC’s understanding that the transition and coverage of these communities will be of particular interest to Ministry staff when reviewing the draft program plan for approval. For example, specific criteria may need to be developed for municipalities to help identify when and what level of service they will receive (e.g., curbside collection, depots, etc.). Moreover, we believe it will be helpful to emphasize the importance of stakeholder consultation, system optimization and the addition of depots in discussions with government.

On behalf of RCC and our members operating in Saskatchewan, we look forward to supporting and being actively involved in the successful transition of the program.

Best regards,



Michael Zabaneh

Vice President, Sustainability
RETAIL COUNCIL OF CANADA
1881 Yonge Street, Suite 800,
Toronto, ON M4S 3C4

MMSW Draft Program Plan Consultation: Restaurants Canada Submission

Presented to:

Multi-Material Stewardship Western (MMSW)

Submitted via email to: info@multimaterialsw.ca.

For more information please contact:

Jennifer Henshaw
Vice President, Prairies and the North
Restaurants Canada
jhenshaw@restaurantscanda.org



**Restaurants
Canada**

The voice of foodservice | La voix des services alimentaires

Introduction

On behalf of Restaurants Canada and our Saskatchewan members, I would like to thank Multi-Material Stewardship Western for the opportunity to provide feedback on the draft Household Packaging and Paper Stewardship Program Plan which was developed in response to the implementation of the Household Packaging and Paper Stewardship Program Regulations, 2023 in March 2023.

Restaurants Canada and our Saskatchewan members support achieving better social, economic and environmental recycling outcomes. Most members and the foodservice sector in general have already taken action to improve the environmental sustainability of their operations.

While reviewing the updated program plan, Restaurants Canada and a number of our members were encouraged to learn that MMSW's draft program, and the Ministry's updated regulations, have incorporated feedback from our previous submission during the consultation phase of the recently implemented Household Packaging and Paper Stewardship Program Regulations, 2023. However, there are still a couple of outstanding recommendations from Restaurants Canada's June 2022 consultation response to the Sask EPR Discussion paper which are not reflected in the draft program plan.

Restaurants Canada

Restaurants Canada is the largest hospitality industry trade association in Canada representing 30,000 members in communities all across Saskatchewan and Canada, including 2,700 restaurants, bars and pubs in the province. Our member businesses across Canada represent every segment of the industry, including full and quick service restaurants, bars, caterers, institutions and their suppliers. Our members recognize sustainability is simply a part of doing good business in restaurants today.

Saskatchewan's Restaurant & Foodservice Industry

Prior to the pandemic, Saskatchewan's \$2.4 billion restaurant industry represented 3% of the province's GDP and was already a highly competitive, labour intensive, low margin industry with average pre-tax profitability of less than 5%. In 2019 our industry was the third largest private sector employer and largest youth employer directly employing 39,700 Saskatchewanians just before COVID, including 15,300 young people under the age of 25, representing 6.8% of the province's workforce. Before COVID-19 the industry included more than 2,700 mostly small businesses in every Saskatchewan community.

The restaurant and foodservice industry brings jobs, investment, innovation and tourism to every community in the province, while creating a focal point for people to gather. Restaurants, cafeterias, coffee shops and bars are gathering spots for people from all walks of life, and operators are proud to serve as a social club for seniors, the sponsor of the local hockey or sports team, the boardroom of small business, and a meeting place for community groups.

Introduction: Saskatchewan Restaurant Sector Update

Restaurants and the many small and medium-sized businesses that make up Saskatchewan’s foodservice sector are critical pillars of our culture, economy, labour market. They are key drivers within their local communities, while generating \$2.6 billion in economic activity, representing nearly 3% of the province’s GDP.

The restaurant industry is also the third largest private-sector employer. We directly employ 32,100 people in Saskatchewan representing more than 5% of the province’s workforce. Due to the impacts of COVID-19, employment is still 5,500 jobs below 2019 levels.

The sector has continued to modernize to keep pace with the growing cost-of-living pressures facing Canadians. Wages in the food and accommodation industry have grown at the second fastest rate between 2022 and 2023 (+9.9% for full-time employees, compared to an average of 4.9%).

Despite the integral role restaurants play in the Canadian landscape, the sector was disproportionately hard-hit by the pandemic, and continues to face lingering impacts that will persist into 2024-25. Half of restaurants and food service companies report continuing to operate at a loss or just break even (Compared to 2019’s pre-pandemic 12%) as food costs continue to grow, while job vacancies across the sector approach 100,000.

Restaurants are resilient, but the pressures they face – from food and transportation costs, to debt, to labor shortages – are severe. Saskatchewan’s restaurants strive to keep meals affordable for those they serve. Restaurants want to continue to do their part to be great community builders and supporters of local charities, but they are at a crisis point. That is why it is so critically important that implementation of the different elements of the updated MMSW program plan, and the fees being imposed on obligated stewards under the revised compliance requirements do not create any undue financial or regulatory burden, and are effectively communicated well in advance.

Draft MMSW Program Plan: Restaurants Canada’s Feedback

Transitioning to a Full EPR Model for Saskatchewan

Restaurants Canada supports the regulatory shift towards a full EPR model will provide producers control over all operational and financial aspects of the system while ensuring a consistent list of designated materials across the province and the creation of economies of scale to promote diversion, increase material value, and encourage packaging innovation. The transition to an EPR program fully funded and operated by producers of household packaging and paper products need to be both operationally and financially responsible for the system to maximize EPR efficiencies.

As the calculation formula for the volume of materials being diverted is developed and finalized, accommodation needs to be made for consumption and the subsequent disposal of packaging and paper materials outside of the home (i.e., in a commercial setting). We echo the recommendation made by other impacted stakeholders: calculation of material volumes being diverted and/or recycled needs to be adjusted in a way which reflects the reality of consumer disposal habits. To achieve this, Restaurants Canada also recommends that the plan is updated by MMSW to include an exclusions and deductions policy which will also be harmonized with B.C.’s EPR. System. Restaurants Canada is urging MMSW to note

this issue as part of the broader discussions around the consultations on proposed collection/diversion targets.

Restaurants Canada supports MMSW's EPR harmonization commitment

Restaurants Canada and our industry's larger franchises and multi-unit operators with locations in different provinces were encouraged to learn that included were the following commitments on EPR program harmonization:

"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."

Harmonization is critical because our members who qualify as obligated producers need to avoid a patchwork of different EPR regulations in each province resulting in confusion and additional regulatory compliance costs. However, Restaurants Canada opposes using Ontario's individual producer responsibility (IPR) framework due to its complexity and is encouraged to learn that Saskatchewan is looking at the BC packaging EPR model for guidance instead. Saskatchewan's EPR model must also be flexible and should avoid being overly prescriptive so ensure it does not disproportionately burden the restaurant sector with additional complex regulations or costly compliance requirements.

The planned transition to full EPR must be done gradually over multiple years, especially given that the restaurant sector has only just begun showing signs of a fragile economic recovery from the pandemic and municipal outreach and planning will be key to ensure the success of system.

Updated business exemptions

Given that Saskatchewan's foodservice industry includes numerous small independent restaurants, it is important to maintain a small producer exemption to help reduce costs and administrative burden for these small businesses. The smaller foodservice businesses which are grappling with several operational and profitability challenges simply do not have the resources and time to effectively participate in the program. Restaurants Canada supports Saskatchewan's exemption for businesses with less than \$1 million in gross annual sales with a requirement to keep records for five years to demonstrate its annual revenue or produce less than one tonne of packaging and paper annually.

However, Restaurants Canada is strongly recommending that MMSW develops a straightforward exemption application process with a concise, flexible and well-communicated list of supporting documents which can be submitted for the compliance exemption application. Creating an overly burdensome and time-consuming exemption application process for smaller businesses, especially restaurant operators, will create additional red tape and cost them precious time and money at a time when they can least afford it.

Designated Materials

As previously outlined, Restaurants Canada supports harmonizing designated materials with other provinces when possible and supports aligning definitions for paper and packaging products with British Columbia with the exception of single-use items such as straws, stir-sticks, cutlery and other foodservice items made from problematic plastics which cause problems for material recovery facilities (MRFs) and often end up in landfills.

For the restaurant sector, their daily operations require the use of packaging because it plays a major role in food safety – from preparation to storage, and packaging take-out orders. While foodservice operators have continued to source environmentally friendly alternatives for these products, they are still necessary for restaurants to maintain the highest health and safety standards and to protect their customers. This is one of the primary reasons why Restaurants Canada does not support the designation of single-use or short-term use products such as straws, utensils, plates, cups and stir-sticks as well as the proposed expanded scope of designated materials to include packaging producers, including foil, plastic food wrap, parchment paper, etc. In addition, while some of these materials will be recycled by producers, given the nature of the restaurant sector – especially quick service restaurants – consumer behavior plays a key role in diversion of these materials. The reality is that food contamination and consumers placing these items into garbage can instead recycling receptacles will continue to result in poor diversion rates.

For those reasons, Restaurants Canada is urging MMSW to make provision in the final program plan for an exemption for food packaging products which are used specifically for food protection and to ensure restaurant customers' health and safety.

Program Costs and Funding

With the transition to a fully producer funded EPR program, we would like to reiterate that industry stewards should be operationally and financially responsible for the system. The financial implications for producers' needs to be clearly understood. Potential increases in program scope including additional designated materials can represent significant cost increases for producers. For this reason, Restaurants Canada supports a gradually phased-in approach beginning in 2024. As identified by other impacted stakeholder organizations as well, Restaurants Canada also supports the creation of a dry-run time period for after the PRO establishes targets for diversion and recycling which will provide MMSW, obligated stewards, and the Ministry with a more accurate and realistic data set to better reflect market realities.

Recovery Rates and Performance Targets

Restaurants Canada believes that realistic and well-understood, widely communicated targets are critical to incentivize diversion and ensure an effective and efficient collection system. In establishing ambitious targets, producers need to be provided with the flexibility to include materials and come up with efficient, cost-effective solutions. A well-designed, effective EPR program provides producers access to post-consumer recycled material that can be integrated into new products and packaging incentivizing producers to innovate inputs into the system in order to improve the quality, quantity, and value of

material outputs. It is critical that material categories are broad enough to capture multiple materials without creating excessive reporting and the administrative burden caused by narrow specific targets.

MMSM to set targets

As outlined in our previous submission during the initial regulatory consultation phase, Restaurants Canada is also in favour of providing MMSM the authority to set initial diversion and recycling rate targets which should be done specifically as a pilot project, aka a 'dry run' to allow for adjustment as necessary before coming into full force. It is critical that the transition to a full EPR system is not rushed, and this approach will provide adequate time for data collection and an in-depth understanding of the recycling rates, etc. The foodservice sector has already taken a leadership role as environmental stewards, with the majority of businesses shifting towards fully recyclable and compostable takeout and delivery packaging. A well-designed EPR program, with industry engagement and investment, will no doubt further incentivize more environmentally friendly packaging options and continue to reduce to use of hard to recycle materials including Styrofoam containers, some plastic materials, etc.

Restaurants Canada supports harmonizing targets and material categories with British Columbia. A grace period before targets and enforcement begins is also necessary given the time and industry investment required during the transition to full EPR. Also, to facilitate compliance and improve diversion rates, it will be important for the Ministry to focus on education and improving awareness with non-compliant producers versus issuing punitive fines.

Conclusion

Restaurants Canada appreciates the opportunity to provide the foodservice sector's perspective and feedback on MMSW's draft Household Packaging and Paper Stewardship Program Plan.

We look forward to continued communication with MSSW and the Ministry going forward to ensure the updated program plan doesn't unduly burden Saskatchewan's struggling restaurant sector and is actually effective in achieving its goal of improved diversion rates within the framework of a producer-driven fully-funded and operated program.



August 1, 2023

Multi-Material Stewardship Western (MMSW)
info@multimaterialsw.ca

RE: MMSW Program Plan Feedback

To whom it may concern:

Based on the information shared at the public consultation in Saskatoon at the Sandman Hotel on June 28, 2023, we would like to provide some feedback on the proposed three-phase rollout of the new MMSW plan for the Province of Saskatchewan.

SARC and SARCAN Recycling have managed and operated the beverage container recycling program for the last 35 years under contract with the Ministry of Environment. SARCAN operates 73 collection depots located in 64 communities across Saskatchewan. In addition, SARCAN owns a fleet of 190 semi-trailers and 7 tractor units, two industrial processing plants and maintains an integrated transportation, logistics, administration, and financial system for the management of the beverage container recycling program. SARCAN currently has an 84% return rate for beverage containers sold in the province. We employ over 900 people across the provincial system. Over 95% of Saskatchewan residents are located within 50 kilometers of a SARCAN depot. SARCAN also accepts electronics, paint and batteries under contract with Saskatchewan EPR programs.

While we recognize the sizeable magnitude and scope of the pending system to be implemented and operated by MMSW, we have a few comments with respect to the limited amount of information and detail shared at the consultation. Based on the information shared, the MMSW program will implement and change the funding model for respective municipalities through the three phases. This is a concern as it will create inequity between municipalities. Some will get a greater degree of funding, while others will receive less funding until later phases. We would advise caution as this will create concerns and confusion amongst SUMA and SARM members across the province. Couple this with a potential shift in the recycling process in the municipality, curbside to depot or new depot, or depot to curbside, or removal of existing systems (curbside and/or depot) and there will be a heightened level of confusion amongst residents in these municipalities.

Limiting accepted PPP in Phase 1 and 2 to paper and cardboard and mixed containers may result in some municipalities having to suspend some items currently collected in their curbside systems until sometime in the future when they may be re-introduced. It is our experience that

changing customer behaviour in an existing program can be challenging and problematic. We strongly discourage removing PPP materials currently recycled unless absolutely necessary. There are viable options ready to accept some of the materials targeted for Phase 3. One of these is Household Glass. SARCAN currently collects Household glass at 43 depots in 35 municipalities across the province and we are prepared to extend this program to all depots in the province. SARCAN had hoped for a relatively seamless transition into a provincial system with MMSW. We feel a simple and early solution is available for household glass across the province and should be considered by MMSW. This would create an accessible province-wide solution for household glass in Saskatchewan. This material should be dealt with earlier in the process, not in year 3 or phase 3. To now remove a material currently being collected, only to try to recapture it in a similar or different collection model in a few years seems complicated and unnecessary. Last year over 800,000 lbs of household glass was collected and diverted from landfills through the SARCAN participating depots. We have the systems, equipment, transport and downstream markets available to handle this material.

While beverage containers are not considered packaging for the purpose of the Program Plan, SARCAN recognizes these containers are currently captured through existing PPP collection systems and will continue to be captured moving forward. As with the MMSW proposed system, any materials that SARCAN is contracted with the Ministry of Environment to manage will need to come to SARCAN and remain with us throughout the recycling and downstream marketing process. Long-standing systems are in place in Saskatchewan for capturing, reporting, refunding, and recycling these deposit-paid beverage containers. We are confident a solution can be reached between MMSW and SARCAN with respect to materials designated for each program.

We are available to meet and further discuss these concerns or options that may exist with MMSW. Please feel free to reach out to me to arrange further meetings or discussions.

Sincerely,



Kevin Acton
Director of SARCAN Operations
SARC/SARCAN Recycling

cc: Amy McNeil, Executive Director – SARC/SARCAN Recycling
Sean Collins, Director of SARCAN Collections – SARC/SARCAN Recycling

August 1, 2023

Multi-Material Stewardship Western
401 – 333 3rd Ave North
Saskatoon, SK

Re: Feedback on Household Packaging and Paper Stewardship Program Plan – DRAFT

Thank you for the opportunity to provide comments on the draft program plan. We appreciate that transitioning to 100 percent producer responsibility is a complex undertaking with many things to consider.

Program Financing

- While we appreciate the efficiencies involved in participating with other PPP programs in Canada to standardize methodologies, how is the situation in Saskatchewan specifically taken into account?
- How does the methodology handle materials that are recycled in some programs, but not in others? Is an additional non-recycling fee charged in those jurisdictions that can't recycle the material?
- Is the steward made aware of the non-recyclability of the material? You speak of using economic incentives to elicit appropriate behaviours from collectors and processors, do you also apply this method to stewards?

Supply Chain Design - principles

- Accessibility is a key principle. We would like to see specifics rather than just the adjectives, which can be interpreted in different ways. Perhaps a target?
- SWRC would like to see a principle that there be no (minimal?) interruption to residential recycling services during the transition.

Collection System

- We agree with the goal of increasing the number of collected materials and standardizing the list across the province.
- We are concerned about the intention to not deal with glass until Stage 3. SARCAN has created partnerships with municipalities to collect household glass via their depots. Their depot network spans the whole province and their end markets for glass are strong. We are concerned that momentum will be lost on a

strong, made-in-Saskatchewan program if it is left until State 3. Why not include it in the Stage 1 and have glass handled from the beginning?

- Compostable packaging and food-soiled paper packaging are collected in composting systems in the province. These are under your purview, as fees are paid on them. They ought to be included in your program. Moreover, data on compostable and food soiled packaging in composting programs should be included in your 'recycling' rate.
- If your processors encounter packages that are on your non-accepted list, will they be compensated for the work involved in handling them?

Transition

- We encourage you to not wait for the official start date for each successive phase to start working on it. The process is quite drawn out and it would be good to accelerate it if possible.

Phase 3

- "Complete an assessment, including stakeholder consultation, on whether providing the option for communities included or eligible under Transition Phase 1 to transition to having MMSW provide curbside and/or multi-family collection directly through a competitive procurement process will provide additional system optimization or efficiencies" – what does this mean? We are uncertain as to your intent.
- Phase 3 seems to cover both depots for communities that have no curbside collection and depots for new additional materials. Aren't these different things? Depots for additional materials will need to be set up throughout the province, in communities with and without curbside programs. They may also need a separate collection and processing system from that used for commingled blue box/bin items. Also, how will you determine program costs for the new additional items?

We look forward to your response and are happy to discuss any of these comments further. Thank you again for the opportunity.



Joanne Fedyk
Executive Director

Kelly Goyer

From: Rhea Good <rhea2224@yahoo.com>
Sent: Tuesday, August 8, 2023 11:14 AM
To: MMSW Info
Subject: comments from Battleford, SK

CAUTION: This email originated from outside of the organization.

Hello MMSW Team,

I am very eager to see the roll-out of this new collection process in Saskatchewan.

When is the best time to start recycling? 20 years ago.
When is the second best time to start recycling? Today.

I understand that your organization is striving to create a brand new entity to coordinate and standardize collection and recycling and this is a daunting task. However, you have the government's mandate to do it, so please do it sooner than later.

I am 100% committed to the "reduce-reuse-recycle" philosophy and I am not squeamish to get dirty doing what needs to be done, but it is disheartening to learn that my blue bin efforts are for naught.

Here are my thoughts after watching the webinars:

1- The SARCAN beverage container system in Saskatchewan is a well-organized system and I wonder if there could be ways to blend the collection facilities to collect other circular materials at SARCAN depots.

2- Incentives need not only be cash per item. Incentives could be expanded to include coupon-type systems such as earning FREE passes to the public swimming pools, FRONT LINE access for camping spots in provincial parks, FREE passes to movie theatres, FREE passes for public transit (this might be very appealing in urban centres) credits for income tax, etc.

3- There are segments of the population that can be invited into the process. There are many adults who are not able to participate in the mainstream workforce due to cognitive deficits and/or physical limitations, but these people are able to do meaningful work in other ways. I was a special education teacher in my career and I often had my students doing hands-on tasks like beverage container collection, paper-shredding, composting, etc. There are many classrooms, adult day programs, and adult residential programs that would be able to sort paper, or wash plastic containers, etc. Is there a way to involve inmates in the corrections system?

I look forward to your reply.

Rhea Good