

# **Supporting Obligated Producers** in Saskatchewan

# Join SK Recycles to Become Compliant with Extended Producer Responsibility (EPR) Regulations in Saskatchewan

On March 31, 2023, the Government of Saskatchewan released The Household Packaging and Paper Stewardship Program Regulations, 2023 (The Regulations). These regulations replaced the regulations from 2016 of the same name and call for a transition from a shared-responsibility stewardship program (where producers covered up to 75 per cent of program costs) to full EPR where producers are financially and operationally responsible for the management of household packaging and paper products (PPP).

Starting in December 2024, Phase 1 of the transition to a full EPR program for the management of PPP will begin in Saskatchewan. As of January 1, 2025, the following producer obligations will be in effect:

- Producers, including brand owners, manufacturers, importers, retailers, marketplace facilitators and restaurants will assume operational and financial responsibility for managing the collection, consolidation, transportation, processing and marketing of the recyclable producer packaging and paper products.
- A broadened definition of an obligated producer and adjusted exemption criteria will impact previously exempt organizations due to changes in the producer obligation hierarchy and changes to exemption criteria. These newly obligated producers will need to ensure they are meeting their new obligations under full EPR legislation in Saskatchewan. Learn more about Saskatchewan's transition to full EPR.

To meet your producer obligations, your business can either develop a plan to meet regulatory requirements independently or join SK Recycles - a producer responsibility organization (PRO) approved by the Saskatchewan government.





#### **About SK Recycles**

SK Recycles (formerly Multi-Material Stewardship Western) is a not-for-profit organization established in 2013 to help obligated businesses meet their requirements under Saskatchewan's Household Packaging and Paper Stewardship Program Regulations. SK Recycles assists its producer members - including brand owners, first importers, franchisors, marketplace facilitators and other obligated organizations - that supply designated household packaging and paper products to Saskatchewan residents fund the recycling program.

The SK Recycles <u>Program Plan</u> was approved by Saskatchewan's <u>Ministry of Environment</u> in May 2024 as a roadmap to transition to a full EPR program operated on behalf of its producer members.

SK Recycles is supported in its work by <u>Circular Materials</u>, a not-for-profit producer responsibility organization which supports producers to meet their EPR requirements and provides management and administrative services to client recycling programs across Canada.



# How to Determine if Your Organization is Obligated Under the **EPR Regulation**



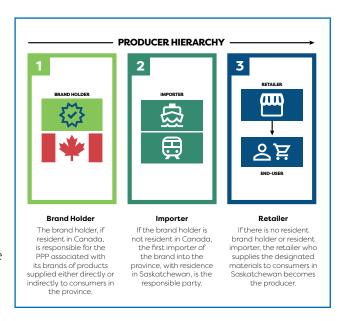
The obligation for an organization to register, report and pay fees is based on three factors:

- Definition of eligibility as defined by The Regulations.
- Supply of packaging and paper products in Saskatchewan.
- Responsibility for supplied packaging and paper.

If your organization is a Canadian brand owner and you supply packaging and paper, including packaging-like products, into Saskatchewan, you may be obligated. The responsibility hierarchy determines your obligation. If there is no Canadian brand owner, then the first importer, or if one does not exist, a retailer in Saskatchewan, may meet the obligations of an obligated producer.

If you are a franchisor with franchisees in Saskatchewan, you are obligated by The Regulations, regardless of your residency, and need to report and pay fees on the materials supplied to consumers by your franchisees. Lastly, if there is no brand owner, first importer, retailer or franchisor, the marketplace seller may be the obligated producer.

**Small Business Exemption**: The Regulations provide exemptions for small businesses that generate less than \$1 million gross annual revenue earned in Saskatchewan (amended from less than \$2 million in the 2016 Regulations), or that supply less than one tonne (1,000 kg) of packaging and paper to residents in the province. Charitable organizations are also exempt from the program.



Detailed definitions and examples of these obligation factors and exemption criteria are available in Circular Materials' Producer Guide. Please contact us at 1-877-667-2626 or info@circularmaterials.ca to discuss your specific situation in detail.

#### Registration with SK Recycles Program to Meet Your Obligations

If you are a newly obligated producer in Saskatchewan and would like to register with SK Recycles to meet your obligations, you will need to take the following steps:

- Create an account on the WeRecycle Portal, a secure online platform for reporting supply data across Canada, within 60 days of becoming obligated (i.e. by March 3, 2025). Creating an account on the WeRecycle Portal requires basic contact information from a registrant to initiate the welcome and onboarding process.
  - Please note, producers already registered with any other provincial program in Canada that is supported by <u>Circular Materials</u> can simply add the SK Recycles program to their existing Portal account.
- Sign a Membership Agreement with SK Recycles.

# Reporting your packaging and paper products to SK Recycles

Producers registered with SK Recycles are required to submit reports on the quantities of designated packaging and paper products supplied in Saskatchewan by the May 31 annual reporting deadline.

To prepare annual reports, producer members must collect and organize their packaging, paper and packaging-like product data based on material types and quantities supplied to consumers in Saskatchewan. Please note, under the new EPR Regulation, aerosol containers have been removed from the reporting obligation requirements.

Producers supplying between 1,000 kg and 5,000 kg of materials annually have the option of a simplified process that reduces the complexity of submitting detailed material reports and allows payment of a set fee.

Various tools and resources are available on the Circular Materials' **Producer Guide** to assist and guide producers with annual reporting data preparation to be submitted via the WeRecycle Portal.



### **Reporting Requirements for Newly Obligated Producers**

Newly obligated producers must file two Annual Producer Reports within 60 days of registering with SK Recycles, or before May 1, 2025, to become up to date with their reporting obligations. These reports include:

- A 2024 Annual Producer Report (based on 2023 supply data) must be filed by May 2, 2025 (or 60 days from registration) which forms the basis for the 2025 invoicing year.
- A 2025 Annual Producer Report (based on 2024 supply data) must be filed by May 31, 2025, as part of the typical annual reporting cycle. The 2025 Report establishes the basis for the 2026 invoicing year.

## Material fee rates and payments

Effective January 1, 2025, producers will be responsible for fees under the new EPR program. Each designated packaging and paper product material is associated with a fee rate. SK Recycles operates on a cost-recovery basis with the objective that all producers pay their fair share to cover costs associated with the collection, transportation and processing of each material.

The SK Recycles program calculates material rate fees for each material category using a producer-developed and approved Four Step Fee Methodology. The fee for each material is divided by the total reported quantity of that material to produce an annual fee rate expressed in cents per kilogram. Invoices are determined by multiplying fee rates by quantities of materials reported.

For more information about historical fee rates, visit our website or check out this Fee Setting 101 Video.

## **Questions and Assistance**

SK Recycles and Circular Materials are ready to help your organization meet obligations for packaging and paper recycling in Saskatchewan. Contact us to obtain a fee estimate, request a copy of the SK Recycles Membership Agreement or with any other questions:

SK Recycles: <u>producers@skrecycles.ca</u> or 1-888-980-9549. Circular Materials: info@circularmaterials.ca or 1-877-667-2626.

To learn more about SK Recycles and Circular Materials, please visit our websites.



**SK Recycles** 401-333 3rd Avenue North Saskatoon, SK S7K 2M2 SKRecycles.ca



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At a Glance: Saskatchewan Regulatory Framework, Annual Reporting, Invoicing & Fees	
Legislation	The Environmental Management & Protection Act
Regulation	The Household Packaging & Paper Stewardship Program Regulations, 2023
Regulator/Oversight Agency	Ministry of Environment
Producer Responsibility Organization	SK Recycles (legal name remains Multi-Material Stewardship Western Inc.)
Agreement Type	Membership Agreement
Designated Materials	SK Recycles - Material List
Share of Obligation	Transition to 100% industry funded and operated
Producer Obligation Date	<ul> <li>January 1, 2025.</li> <li>Under new Regulations, program operations begin December 1, 2024.</li> </ul>
Annual Producer Report Due in WeRecycle Portal	<ul> <li>Newly obligated producers will owe both a 2025 and a 2026 invoice.</li> <li>2025 Annual Producer Report (based on 2024 supply data) is due to SK Recycles on May 31, 2025. This Report informs the 2026 invoice.</li> </ul>