



Waste Packaging and Paper Stewardship Plan

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Waste Packaging and Paper Stewardship Plan

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1 Introduction

The Province of Saskatchewan approved *The Environmental Management and Protection Act* in 2002. Clause 81(1)(aa) of the Act provides authority to make regulations requiring the creation and operation of a product management program.

On February 6, 2013, the Saskatchewan government approved *The Household Packaging and Paper Stewardship Program Regulations*. Stewards are required to either enter into an agreement with an agency that will develop and operate a product management program¹ on their behalf or develop and operate a product management program to manage their own packaging and paper products.

2 The Stewardship Agency

This stewardship plan for waste packaging and paper (WPP) has been developed by Multi-Material Stewardship Western Inc. (MMSW) pursuant to the requirements of the Regulations. MMSW is a not-for-profit stewardship agency established under the Saskatchewan *Non-Profit Corporations Act* formed in order to discharge stewards' obligations under *The Household Packaging and Paper Stewardship Program Regulations*.

MMSW forms part of the Canadian Stewardship Services Alliance (CSSA) - a family of recycling organizations that includes other provincial stewardship agencies that discharge stewards' obligations for packaging and paper. CSSA is a federally incorporated not-for-profit organization whose mandate is to deliver a shared services business infrastructure that consolidates all the administrative functions related to delivering a stewardship program in any given provincial jurisdiction. The shared services approach is designed to achieve greater administrative efficiencies and less complexity for stewards who must report to multiple jurisdictions across Canada. CSSA's mandate also includes assisting with the development and support of environmentally sustainable producer responsibility programs in Canada and advocating for a nationally harmonized approach to EPR policy and regulations according to the objectives set out in the 2009 Canadian Council of Ministers of the Environment (CCME) Canada-wide Action Plan for Extended Producer Responsibility.

¹ Clause 2(1)(g) defines product management program as "a program for the collection and recycling of residentially generated waste packaging and paper".

2.1 Stewards

Clause 3 of *The Household Packaging and Paper Stewardship Program Regulations* defines stewards as:

- a) “the brand owner² with respect to the packaging or paper, unless the brand owner is a non-resident brand owner³;
- b) if there is no brand owner as described in clause (a), the person that first imports the packaging or paper into Saskatchewan; or
- c) if there is no brand owner as described in (a) or person that first imports the packaging or paper as described in clause (b), the purchaser of the packaging or paper outside of Saskatchewan that purchases it for use in Saskatchewan”.

MMSW is acting on behalf of stewards of WPP in submitting this stewardship plan. For the purposes of the WPP stewardship plan, the steward for a specific unit of packaging or paper is the supplier of service packaging or the first of the following that is resident in Saskatchewan: brand owner, the franchisor or the first seller (also known as the first importer)⁴.

A brand owner that is not resident in Saskatchewan can volunteer to be a steward under this product management program to relieve the steward resident in Saskatchewan (that receives packaging and/or paper from the non-resident brand owner) of the obligations arising from *The Household Packaging and Paper Stewardship Program Regulations*.

2.2 Board of Directors

The Household Packaging and Paper Stewardship Program will be governed by a national board of directors comprising representatives of brand owners and stewards obligated under *The Household Packaging and Paper Stewardship Program Regulations*. Directors will be well versed in their fiduciary responsibilities and will be selected on the basis of their skills and experience as well as their sectoral and regional representation.

In addition to receiving fiduciary oversight from a national board of directors, MMSW will participate in and provide support to the provincial Advisory Committee comprising local stakeholders who are directly impacted by the stewardship program in Saskatchewan and whose views are integral to affecting continuous improvement in the program’s operation.

² Clause 2(1)(b) defines brand owner as the person who is the owner or licensee of a trade-mark that is used in association with or marked on packaging or paper.

³ Clause 2(1)(b) defines non-resident brand owner as a brand owner who does not carry on business in Saskatchewan.

⁴ Refer to the Glossary in Appendix A for definitions of these terms.

2.3 Advisory Committee

An Advisory Committee will be established to serve as a forum through which Saskatchewan stakeholders are kept informed of stewardship program activities and through which they can provide advice and feedback on core program activities. The members of the Advisory Committee will volunteer their services to represent their specific constituency and bring issues from their group (as well as their own personal experience) to Advisory Committee meetings. Committee members are responsible for gathering input from their respective constituencies and representing constituencies' views on issues.

The Advisory Committee will include members reflecting the interests of urban and rural municipalities and regional waste management authorities. Advisory Committee members will be qualified representatives of their respective sector who are committed to reflecting their constituency's perspectives and participating on the committee for its stated purposes.

MMSW will work collaboratively with local government associations to identify the qualifications and expertise required by Advisory Committee members. With the identified qualifications and expertise as a guide:

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

The board will appoint these nominees as well as up to three representatives of stewards of residential packaging and paper to form the Advisory Committee. The steward representatives on the Advisory Committee will reflect the range of stewards participating in the MMSW program⁵. A minimum of one representative will be from a steward based in Saskatchewan.

The Advisory Committee will be co-chaired by a steward representative and a non-steward representative. The co-chairs will provide leadership to the committee, facilitate discussion of specific issues, and serve the committee in meeting its requirements. The co-chairs will, in collaboration with the board and Advisory Committee members, develop terms of reference and protocol to guide the activities of the Advisory Committee.

The Advisory Committee will meet a minimum of twice and no more than four times per year. The committee can meet in person or via teleconference, depending on the availability of committee members. Should an in-person meeting be held, MMSW will reimburse members for travel costs based on a mileage rate approved by the board.

⁵ Brand owners and first importers based in Saskatchewan and voluntary stewards that are based outside of Saskatchewan.

MMSW will make available a staff person to assist the co-chairs in carrying out their duties.

The Advisory Committee may, at its discretion, invite guests with specific expertise in the collection and recycling of WPP to attend a meeting of the Advisory Committee and/or representatives of the Ministry of the Environment to observe Advisory Committee discussions.

The Advisory Committee will submit a report to the board at least annually providing feedback on the operation of the stewardship program and presenting findings and/or recommendations on improvements and/or enhancements. The Advisory Committee may make recommendations on:

- The dispute resolution procedure to be utilized by local governments;
- The collector and processor policies and procedures;
- The definition of municipal costs and revenues;
- The regional waste authorities and municipalities selected in each of the first two years as the sample group for whom the accredited accountants will confirm reported tonnes of residential WPP and will compile municipal costs and revenues associated with the tonnes of residential WPP, as described in Section 4.4.2.
- The proposed methodology to measure efficiency and effectiveness of municipal WPP collection and recycling programs;
- Proposed revisions to the funding formula for local governments; and
- Proposed amendments to the WPP program plan that affect local government programs to collect and recycle residential WPP.

The committee's recommendations are non-binding and are based upon a majority vote of its members. From time to time, the board may request to meet with the Advisory Committee in person.

2.4 Management Structure

MMSW is responsible for implementing the product management program on behalf of the stewards that have chosen to be members. MMSW will administer the implementation of the product management program through:

- A local office to provide direct interface to municipalities and First Nations, and
- Centrally managed administrative and back office services utilizing common business processes and information systems for steward registration, reporting, fee invoicing, payments, audits and compliance in order to facilitate harmonized systems for Canadian stewards, whether operating only in Saskatchewan or in other Canadian provinces.

2.5 Collaborating with Other Product Management Programs⁶

MMSW will participate on Recycle Saskatchewan in order to collaborate with SARCAN Recycling, the Saskatchewan Waste Electronic Equipment Program, the Saskatchewan Association for Resource Recovery Corporation, the Saskatchewan Scrap Tire Corporation and the Saskatchewan Paint Recycling Program to identify and implement joint projects that can assist the organizations in achieving their regulatory objectives.

MMSW will participate in the delivery of harmonized services to stewards of waste paper and packaging and leverage activities of the agencies responsible for waste packaging and paper programs in British Columbia, Saskatchewan, Manitoba and Ontario.

3 Waste Packaging and Paper

3.1 Packaging

Clause 2(1)(e) of *The Household Packaging and Paper Stewardship Program Regulations* defines packaging as “any packaging or container that is composed of glass, metal, paper, boxboard, cardboard, paper fibre or plastic or any combination of those materials and contains a product but does not include approved containers as defined in *The Litter Control Act*”.

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

- (a) Primary packaging, i.e., packaging that contains the product at the point of sale to the residential consumer;
- (b) Grouped packaging or secondary packaging that goes to the household⁷;
- (c) Transportation, distribution or tertiary packaging that goes to the household⁸;
- (d) Service packaging designed and intended to be filled at the point of sale and “disposable” items sold, filled or designed and intended to be filled at the point of sale such as:
 - Paper or plastic carry-out bags provided at checkout;
 - Bags filled at the shelves with bulk goods, produce, baked goods, etc.;
 - Disposable plates and cups;
 - Take-out and home delivery food service packaging such as pizza boxes, cups, bags, folded cartons, wraps, trays, etc.;
 - Flower box/wrap;
 - Food wraps provided by the grocer for meats, fish, cheese, etc.;
 - Paper envelopes for developed photographs;

⁶ Section 7.2(g) of the Regulations refers to “other product management programs approved pursuant to these regulations or any other regulations made pursuant to clause 8(1)(aa) of the Act”. MMSW interprets this to mean other product management programs operated by stewardship agencies.

⁷ Multiple packages of product sold in a unit, often wrapped in film plastic.

⁸ May be both the primary packaging for the product and the package used to ship the product but is referred to as transportation packaging that goes home with the consumer. For example, household products packaged in corrugated boxes intended for final use or management by the consumer or end user.

- Gift wrapping/tissue paper added by the retailer; and
- (e) Packaging components and ancillary elements integrated into packaging, including ancillary elements directly hung or attached to a product and which perform a packaging function unless they are an integral part of the product and all elements are intended to be consumed or disposed of together⁹.

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

The following items are **not** considered packaging for the purposes of the WPP stewardship plan:

- Beverage containers governed by The Litter Control Designation Regulations (1998);
- Empty oil¹⁰ containers as governed by The Used Oil Collection Regulations (1996);
- Transportation and distribution packaging that is not intended primarily for use or management in the home, for example, plastic pallet wrap;
- Industrial or bulk packaging that is not intended for sale or use by residents in the home;
- Other items that are not generally considered to be packaging such as accessories to the product that do not serve a packaging function (e.g., plastic cutlery, straws, paper serviettes) and packaging components sold as product (empty) to the end consumer (e.g., garbage bags, organic waste bags, food storage bags, food storage containers); items that constitute an integral part of the product (e.g., toner cartridges, single use cameras);
- Durable packaging, which is packaging that has a useful life of at least five years and is intended to facilitate storage or transport or to prevent the loss of product components for durable products and which remains with the product throughout its useful life, e.g., CD/DVD cases, packaging used to store pieces of a board game; and
- Wood, ceramic, crystal, rubber and leather packaging.

3.2 Paper

Clause 2(1)(f) of *The Household Packaging and Paper Stewardship Program Regulations* defines paper as “paper of any description including flyers, brochures, booklets, catalogues, telephone directories, newspapers, magazines, paper fibre and paper used for copying, writing or any other general use” qualified by Clause 2(2) which indicates that paper does not include “paper products that, by virtue of their anticipated use, could become unsafe or unsanitary to recycle or any type of bound book not mentioned in clause (1)(f)”.

⁹ Examples of this kind of packaging include, but are not limited to: labels and lids hung directly on or attached to the packaging; mascara brush which forms part of the container lid; staples, pins, clips; toy on the top of a candy product which forms part of the lid; devices for measuring dosage that form part of the detergent container lid; plastic make-up case; brush contained in the lid of corrective liquid paper; zipper on a plastic film bag containing a product.

¹⁰ “Oil” means any petroleum or synthetic oil that is recoverable for other uses and that is used for the purposes of insulation, lubrication, hydraulics or heat transfer and includes vegetable oil used for lubricating purposes (Section 2(1)(d) The Used Oil Collection Regulations 1996).

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

3.3 Sources of Waste Packaging and Paper

Clause 2(1)(g) of *The Household Packaging and Paper Stewardship Program Regulations* defines a product management program as “a program for the collection and recycling of residentially generated waste packaging and paper”.

Residential sources of waste packaging and paper include:

- Single-family dwellings inhabited year round or seasonally¹¹; and
- Multi-family dwellings including rental, co-operative, fractional ownership, time-share, condominium¹² and seniors residences¹³.

4 Product Management Program

4.1 Approach to Addressing Approval Standards

Clause 7(4) of *The Household Packaging and Paper Stewardship Program Regulations* sets out the standards considered by the Minister when assessing the product management program:

- Clause 7(4)(a) requires that, if a program for waste packaging and paper is operated efficiently and effectively by a municipality or its designate, the municipality or designate will be reimbursed for up to 75% of the net costs of operating the program;
- Clause 7(4)(b) requires that the funding formula be appropriate for the range of collection and recycling options to be offered under the program across Saskatchewan;
- Clause 7(4)(c) requires that the product management program provide convenient, effective and efficient recycling to Saskatchewan residents, taking into consideration Saskatchewan's demography and geography;
- Clause 7(4)(d) requires that the product management program maximize diversion of residentially generated waste packaging and paper from municipal landfills;
- Clause 7(4)(e) requires that the product management program maximize social benefits, including encouraging municipalities to contract with persons, bodies or other entities that provide employment and training to persons with disabilities and operate efficient and effective programs; and

¹¹ Excluding vacation facilities, such as hotels, motels, cottages and cabins, which are considered commercial operations.

¹² Excluding vacation facilities, such as rental, co-operative, fractional ownership, time-share or condominium accommodation associated with sports and leisure facilities (e.g., ski resorts), which are considered commercial operations.

¹³ Excluding residences at which medical care is provided, such as nursing homes, long-term care facilities and hospices, which are considered institutions.

- Clause 7(4)(f) requires that the product management program encourage entrepreneurial opportunities within Saskatchewan.

The standard set out in Clause 7(4)(a) relates to the manner in which municipal costs are determined and the manner in which funding will be available to municipalities. Section 4.4.1 describes the methodology to be used to determine municipal costs and Section 4.4.2 describes the manner in which funding will be available to municipalities.

The standards set out in Clauses 7(4)(b) (c) and (d) relate to the manner in which WPP services are delivered to residents including the range of collection and recycling options, convenience, efficiency, effectiveness and diversion performance. As municipalities deliver WPP services, these standards are addressed in Section 4.4.2 which describes the manner in which funding will be available to municipalities.

The standard set out in Clause 7(4)(e) relates to maximizing social benefits. This standard is addressed in the collector and processor policies and procedures described in Section 4.3 and set out in Appendix B.

The standard set out in Clause 7(4)(e) relates to encouraging entrepreneurial opportunities within Saskatchewan. This standard is addressed in Section 4.4.2 which describes the manner in which funding will be available to municipalities.

4.2 Representing Interests

4.2.1 Government of Saskatchewan and Residents of Saskatchewan

The Government of Saskatchewan and the residents of Saskatchewan have been grouped together for purposes of this section as it is assumed that the interests of both groups are aligned.

The product management plan for waste packaging and paper will represent the interests of the Government of Saskatchewan and the residents of Saskatchewan by:

- Encouraging convenient, effective and efficient recycling services for Saskatchewan residents, taking into consideration Saskatchewan's demography and geography;
- Providing financial incentives to maximize collection and recycling of residential WPP which will divert residential WPP from municipal landfills, thereby extending the life of the landfills, reducing release of leachate and emission of greenhouse gases, and conserving resources;
- Measuring and tracking greenhouse gas emissions associated with collecting and recycling residential WPP;
- Encouraging municipalities to contract with persons, bodies or other entities that provide employment and training to persons with disabilities and operate efficient and effective programs; and
- Encouraging entrepreneurial opportunities associated with the collection and recycling of residential WPP.

4.2.2 Municipalities and First Nations

Municipalities and First Nations have been grouped together for purposes of this section as it is assumed that the interests of both groups are aligned.

The product management plan for waste packaging and paper will represent the interests of municipalities and First Nations by:

- Providing financial incentives to municipalities and First Nations to deliver curbside and multi-family building collection services and/or to operate depots to accept WPP delivered by residents, as appropriate given Saskatchewan's demography and geography;
- Providing financial incentives to municipalities and First Nations to maximize collection and recycling of residential WPP reducing demand for disposal capacity;
- Compiling and reporting the data described in Section 4.6.1, providing a source of information for municipalities and First Nations in their on-going efforts to provide more convenient, effective, efficient and sustainable residential WPP collection and recycling programs; and
- Contributing to building awareness among Saskatchewan residents about WPP collection and recycling opportunities.

4.2.3 Recycling Service Providers

The product management plan for waste packaging and paper will represent the interests of recycling service providers by:

- Providing financial incentives to support existing WPP collection and processing services which have been established through investments in social and capital infrastructure in Saskatchewan;
- Providing financial incentives to maximize collection and recycling of residential WPP which will allow additional investment into social and capital infrastructure and will provide entrepreneurial opportunities associated with WPP management in Saskatchewan; and
- Compiling and reporting the data described in Section 4.6.1, allowing recycling service providers that provide WPP services to municipalities to benchmark their operations and identify opportunities for improvements to yield more effective, efficient and sustainable residential WPP collection and recycling programs.

4.2.4 Environmental Organizations

The product management plan for waste packaging and paper will represent the interests of environmental organizations by:

- Encouraging convenient, effective and efficient recycling services for Saskatchewan residents;
- Providing financial incentives to maximize collection and recycling of residential WPP which will divert residential WPP from disposal; and

- Measuring and tracking greenhouse gas emissions associated with collecting and recycling residential WPP.

4.3 Collector and Processor Policies and Procedures

Collector and processor policies and procedures set out the minimum requirements that a municipality or a municipality's designate¹⁴ must meet on a continuous basis in order to be eligible to receive funding under the product management program.

These policies and procedures are intended to support the continued growth of a safe, stable and sustainable WPP collection and recycling system in Saskatchewan and will be incorporated into contracts with municipalities or municipalities' designates.

Policies and procedures are set out in Appendix B in the following categories:

- General Policies and Procedures for Collectors and Processors;
- Policies and Procedures for Household Collection Services;
- Policies and Procedures for Depot Collection Services; and
- Policies and Procedures for Processing Services.

The Collector and Processor Policies and Procedures in Appendix B will be reviewed periodically and will be updated as appropriate to reflect best practice in delivery of municipal programs to collect and recycle residential WPP.

4.4 Funding of Municipal WPP Collection and Recycling Services

4.4.1 Determining Municipal Costs and Revenues for Years 1 and 2

In July 2012, MMSW commissioned a *Saskatchewan Datacall Analysis Report* (Datacall Report) to compile baseline information on the volumes of residential WPP recycled within the province of Saskatchewan and the methods and costs associated with managing these materials. This Report represents a single snapshot of municipal program tonnes and costs compiled between March and July 2012.

Experience with datacalls in other jurisdictions indicates that the first effort to compile WPP program data from municipalities typically includes significant inaccuracies as a result of:

- Difficulty extracting WPP data from local government data management systems;
- Inconsistent interpretation of terminology among local governments resulting in inconsistent data reporting; and
- Lack of experience allocating shared or blended costs to WPP services.

¹⁴ A municipality's designate is "another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality" as set out in Clause 7(4)(a).

Typically a number of years of experience, supported by local government staff training and rigorous verification protocol, are required to reach a steady-state of reliable data.

Since the Datacall Report was completed, a number of Saskatchewan municipalities have taken steps to implement new curbside collection programs, most notably the Cities of Saskatoon and Regina. Due to the construction of new processing facilities in each of these cities, a number of surrounding communities have also modified their WPP collection system either from depot to curbside collection or from paper products only to single stream collection including paper products and packaging containers. It is estimated that curbside collection of WPP will be introduced to approximately 35% of the households in Saskatchewan between Quarter 1 and Quarter 3 of 2013.

Concerns with the reliability of the data compiled in the 2012 Datacall Report together with program changes since the report was completed have contributed to a reluctance to utilize the cost data in the Datacall Report as the basis for a funding formula.

MMSW is therefore proposing to utilize municipal program cost data from the Multi-Material Stewardship Manitoba (MMSM) program where:

- Municipal costs have been compiled for more than a decade providing the time necessary for reporting accuracy to improve; and
- WPP collection programs have been operating for a similar period of time providing the time necessary to identify and implement best practices.

To determine municipal costs and revenues for the first two years of program implementation, MMSW proposes to utilize:

- The costs identified by Multi-Material Stewardship Manitoba for Winnipeg to estimate program costs for Saskatoon and Regina;
- The costs identified by Multi-Material Stewardship Manitoba for Brandon to estimate program costs for municipalities with a population between 15,000 and 100,000 (Prince Albert, Moose Jaw, Yorkton, Swift Current); and
- The costs identified by Multi-Material Stewardship Manitoba for Manitoba municipalities with population less than 15,000 in three population categories (0 to 999, 1,000 to 4,999 and 5,000 to 14,999 people) to estimate program costs for all remaining Saskatchewan municipalities.

Recognizing that a portion of the containers managed by Manitoba programs are part of a deposit-return system in Saskatchewan, Manitoba costs have been adjusted to remove commodity revenue that Manitoba programs receive for the containers likely to be returned for deposit by Saskatchewan residents.

4.4.2 Determining Municipal Costs and Revenues for Year 3 and Beyond

During the first two years of program operation, MMSW will implement a process to update municipal cost data. To avoid imposing the administrative burden of an annual Datacall on all Saskatchewan municipalities participating in the product management program and to ensure that the data compiled are comprehensive and consistent, MMSW is proposing to use the services of accredited accountants to confirm tonnage data reported by municipalities and compile data on municipal costs and revenues¹⁵ including:

- The quantity of residential WPP collected and marketed by the municipality;
- Costs¹⁶ incurred by the municipality to deliver WPP collection services and to process and market the collected WPP;
- Revenue received by the municipality and/or by its processing contractor from commodity markets; and
- Any other revenue received by the municipality associated with the WPP program.

Data will be compiled from a sufficient number of municipalities and regional waste authorities (RWA) to provide a reasonable sample of the municipalities in the categories used in the funding formula, taking into consideration the proportion of tonnes collected and costs incurred by the municipalities in the category.

The following table sets out the number of regional waste authorities and municipalities that will be selected in each of the first two years as the sample group for whom the accredited accountants will confirm reported tonnes of residential WPP and will compile municipal costs and revenues associated with the tonnes of residential WPP.

Population Categories	Number of RWA in Population Category	Estimated Number of RWA in Study Group	Number of Municipalities (Non-RWA) in Population Category ¹⁷	Estimated Number of Municipalities (Non-RWA) in Study Group
>100,000	0	0	2	2
5,000 - 100,000	9	3	11	2 to 4
1,000 - 4,999	8	2	72	5 to 10
0 - 999	0	0	604	15 to 20

¹⁵ Data compiled by the accountant for a particular regional waste authority or municipality will be provided to the regional waste authority or municipality, respectively, for its information and review.

¹⁶ The cost and revenue categories are set out in Attachment C.

¹⁷ Based on StatsCan data from 2011 census.

MMSW will use the data compiled by the accountants to:

- Inform the development of definitions of 'efficient' and 'effective' for purposes of funding up to 75% of an efficient and effective program;
- Assess the efficiency and effectiveness of programs operated by municipalities to collect and recycle WPP; and
- Adjust the funding formula to offer funding to municipalities operating efficient and effective programs up to, but not more than, 75% of their net costs of operating the programs.

In adjusting the funding formula, MMSW may:

- Modify the structure of the funding formula to:
 - Reflect cost differences for the various types of WPP collection services;
 - Reflect municipal characteristics that affect the costs to deliver WPP collection services; and/or
 - Encourage program efficiency and effectiveness;
- Modify funding rates to fund, on a go-forward basis, up to 75% of municipalities' net costs to operate efficient and effective WPP programs;
- Modify funding rates to encourage increased diversion of WPP from landfill; and/or
- Modify the funding rate to recover any over payment of funding or top up any under payment of funding to municipalities in the first two years of the program should the funding formula applied at program launch be based on incorrect population or tonnage data.

The process described above will be repeated every two to three years so that the data on municipal tonnes and net costs used as the basis for the funding formula are routinely updated.

4.4.3 Funding Formula

The manner in which funding is distributed is intended to:

- Encourage delivery of convenient, effective and efficient WPP collection and recycling services taking into consideration Saskatchewan's demography and geography;
- Encourage delivery of WPP collection in all areas of Saskatchewan using the collection system most appropriate to each area's demography and geography;
- Encourage diversion of residentially generated waste packaging and paper from municipal landfills;
- Provide entrepreneurial opportunities for municipalities and those that operate residential WPP programs on behalf of municipalities; and
- Reimburse municipalities for up to 75% of the net costs of operating the program in relation to the efficiency and effectiveness of their WPP collection and recycling system.

Funding Eligibility

The organization eligible to receive funding under the WPP product management program is either a municipality or a municipality's designate¹⁸. MMSW will provide funding to a municipality's designate, rather than the municipality, only with appropriate authorization from the municipality on whose behalf the designate is operating residential WPP services.

The municipality or the municipality's designate receiving the funding must meet the following requirements:

- Provide WPP collection services to residents and recycle the collected WPP; and
- Be in compliance with the collector and processor policies and procedures set out in Appendix B.

Collection and Recycling Options

In developing the funding formula, MMSW noted the types of WPP collection services currently being provided by Saskatchewan municipalities:

- Household collection services for WPP in some municipalities;
- Operation of depots to which residents can deliver WPP in other municipalities; and
- Both household collection services and depots operating in parallel in some municipalities.

These collection options can be accommodated in the product management program's funding formula in order to support convenient WPP services to Saskatchewan residents taking into consideration Saskatchewan's demography and geography.

Municipal Funding for Years 1 and 2

Funding under the product management program is available to municipalities, subject to compliance with the collector and processor policies and procedures set out in Appendix B, based on their population as set out in the following table:

Population Category	Estimated Program Costs¹⁹	Municipal Funding (75% of Estimated Program Cost)
> 100,000 ²⁰	\$124 per tonne	\$93 per tonne
15,000 to 100,000 ²¹	\$207 per tonne	\$156 per tonne

¹⁸ Another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality.

¹⁹ Based on approach described in Section 4.4.1 Determining Municipal Costs and Revenues.

²⁰ Regina and Saskatoon.

²¹ Prince Albert, Moose Jaw, Yorkton and Swift Current.

Population Category	Estimated Program Costs¹⁹	Municipal Funding (75% of Estimated Program Cost)
5,000 to 14,999	\$253 per tonne	\$190 per tonne
1,000 to 4,999	\$296 per tonne	\$222 per tonne
1 to 999	\$406 per tonne	\$305 per tonne

Funding Household WPP

The product management program is for the collection and recycling of residentially generated waste packaging and paper. Funding is therefore not provided for WPP from industrial, commercial or institutional (ICI) sources.

Where WPP from residential households and ICI locations is collected on the same collection routes, municipalities will be required to report the total number of households and ICI locations serviced. MMSW will prorate the tonnes collected across the total number of stops and calculate the tonnes of WPP assumed to be residentially generated WPP prior to calculating the funding due to the municipality.

MMSW will deduct 20% of the tonnes of WPP collected at depots to reflect the portion of WPP received that is assumed to be from ICI sources²². Municipalities may request an adjustment to the percentage deducted by either:

1. Accepting only residential WPP and supporting this policy by:
 - Communicating to the community being served by the depot that only WPP from households is accepted at the depot and that ICI WPP is not accepted by making this statement prominently on the depot’s website, in all depot communications materials and on signs at the depot; and
 - Documenting how the residential-only policy is implemented and enforced by depot staff.

or

2. Providing records to confirm that the ICI WPP received at the depot represents less than 20% of the WPP received at the depot. Records would comprise:

²² MMSW will monitor the quantity of WPP collected at depots by the population and households in the depot service area in relation to the quantity of WPP supplied by stewards to residents on a per capita and per household basis and therefore available for collection. Should the quantity collected at a specific depot or group of depots be higher than the typical capture rate of residential WPP available for collection, MMSW will increase the 20% deduction so that the quantity of residential WPP collected at these depots is within the typical range of residential WPP collected at similar depots.

- The number of vehicles from a residential address that did not contain ICI WPP and the number of vehicles containing ICI WPP over a period that represents at least 20% of the annual tonnage collected by the depot; and
- The weight of residential WPP and the weight of ICI WPP received over a period that represents at least 20% of the annual tonnage collected by the depot.

Applications received will be reviewed by MMSW. A decision to reduce the factor is solely at MMSW's discretion but will not be unreasonably withheld if the information provided in the application is complete, considered to be accurate and reliable and supports a lower factor.

4.4.4 Steward Financing

MMSW is responsible to the stewards that have chosen to be its members to deliver an efficient and effective WPP product management program.

Stewards and non-resident brand owners that choose to be members of MMSW are responsible to pay fees that are sufficient, in aggregate, to implement the WPP product management program. These costs fall into two categories:

- Administration - what it takes to manage the business; and
- Material management - what it takes to manage materials.

Stewards and non-resident brand owners that choose to be members of MMSW will pay fees that are intended to cover:

- An equitable share of MMSW administration costs;
- An equitable share of the public awareness and communication strategy costs; and
- A contribution to the costs to manage WPP that is collected and recycled.

Costs incurred by MMSW to deliver and administer the WPP product management program will be allocated among stewards based on the following principles:

- **Encourage reduction, redesign and recyclability** - Allocation of product management program delivery costs to reward stewards that supply recyclable WPP for which there is market demand and high commodity value and to encourage producers that supply WPP for which there are no end markets or limited markets with low commodity value to consider reduction, redesign and recyclability;
- **Equitable sharing of program delivery costs** - Subject to the principle above, allocation of costs to stewards that supplied the WPP for which costs were incurred; where costs are incurred for commingled materials, allocation of costs to each category of WPP reported by stewards using a cost allocation model²³ informed by composition audits, cost allocation studies and other analyses to identify the relative cost share for each category of WPP; and

²³ The cost allocation model is subject to modification over time consistent with the principles of continuous improvement.

- **Equitable sharing of administration costs** - Equitable sharing of administration costs, communications costs and common costs by all stewards.

MMSW will communicate with stewards and non-resident brand owners that choose to be members of MMSW to explain how fees are determined and applied by:

- Email notices and electronic newsletters;
- Postings on the MMSW website;
- Workshops with simultaneous webcast to provide an opportunity for questions and dialogue; and
- A dedicated email address and phone number supported by steward services staff to respond to inquiries and provide assistance to stewards and non-resident brand owners that choose to be members of MMSW.

Following approval of the product management program, stewards will be required to report the quantity of packaging and paper supplied to Saskatchewan residents and MMSW will calculate the fees due from stewards to meet the financial obligations set out in Section 4.4.3.

4.4.5 Dispute Resolution

MMSW will seek to balance the principles of access, efficiency, fairness and equitable outcomes in the application of its financial dispute resolution mechanisms. Should a municipality dispute the application of the funding formula, the following dispute resolution escalation process will be used:

- Discussion with MMSW senior management
- Facilitation: to prevent escalation and to explore interests/remedies
- Mediation: to be used if facilitation is unsuccessful²⁴
- Arbitration: to be used if mediation is unsuccessful²⁵

4.5 Communications

Clause 7(2)(e) of *The Household Packaging and Paper Stewardship Program Regulations* requires that the product management program provide details with respect to the public education or public awareness and communication strategy for the product management program, including details with respect to:

- The manner in which consultation will take place during the development of the program and after the program is operational;

²⁴ The contract between MMSW and a municipality will set out the process to select a mediator, roles of the parties, responsibility for fees/costs, conclusion of mediation by agreed settlement or final settlement proposal by the mediator, etc.

²⁵ The contract between MMSW and a municipality will set out the process regarding notice of arbitration, submission of written statements, the process for rendering and delivering decisions; jurisdiction and powers of the arbitrator, allocation of costs/fees; application of the Saskatchewan Arbitration Act 1992, etc.

- A description of how municipalities and First Nations will be encouraged to participate in the program; and
- A description of how the public will be informed about the product management program and any changes to that program.

The manner in which consultation will take place during development of the program and after the program is operational is addressed in Section 4.8.

A description of how municipalities and First Nations will be encouraged to participate in the program is provided in Section 4.4.

This section describes the public awareness and communication strategy that addresses how the public will be informed about the product management program and any changes to that program. The objective of a public awareness and communication strategy is to make residents aware of the introduction of the product management program and any substantive changes to the program through communication activities.

The design of the product management program communication activities will be set out in a strategic communication plan that will be developed following approval of the product management program. The principles guiding the development of the communication strategy will be:

- **Understand resident audiences** – assess the needs of the various resident audiences who will receive WPP collection services from municipalities;
- **Engage residents** – employ contemporary methods of communication interaction (e.g., social media) as well as traditional methods to engage residents;
- **Collaboration** – explore opportunities to collaborate with other Saskatchewan stewardship agencies, local governments, environmental organizations, community-based organizations and others to develop strategies and deliver communication messages that strive to inform and motivate; and
- **Design and deploy effective communications** – ensure that communication strategies reflect these needs, are clearly understood, overcome perceptual and real barriers, contain a call to action and motivate appropriate behaviour.

The communications strategy will be evaluated periodically and will be updated and enhanced as required.

4.6 Measurement

4.6.1 Collection and Recycling of Waste Packaging and Paper

During implementation of the WPP product management program, MMSW will compile data from municipalities or municipalities' designates²⁶ in order to report:

- Tonnes and kilograms per capita of WPP collected by each participating municipality or its designate;
- Tonnes and kilograms per capita of WPP recycled by each participating municipality or its designate;
- Total tonnes of WPP recycled and therefore diverted from municipal landfills;
- The recovery rate for each category of WPP reported by municipalities to MMSW as a percentage of the total of that category of WPP generated;
- The recovery rate of total WPP diverted as a percentage of total WPP generated;
- The amount of revenue received by municipalities from the sale of WPP.

Municipalities (and/or municipalities' designates) will be periodically audited, as a quality control and assurance measure, to confirm the accuracy of the WPP collection and recycling data being reported to MMSW and upon which MMSW relies for reporting on the implementation of the product management program.

4.6.2 Greenhouse Gas Emissions

MMSW will undertake the necessary research and develop a data tracking and modelling system for greenhouse gas emissions (GHG) associated with Saskatchewan's residential WPP collection and recycling activities. Following development of the model, MMSW will modify contracts with municipalities to include reporting of the necessary data. MMSW will begin to compile GHG data from municipalities not later than three years after the commencement of the product management program with the full data tracking system functional within two years of that date.

Municipalities (and/or municipalities' designates) will be periodically audited, as a quality control and assurance measure, to confirm the accuracy of the GHG emissions data being reported to MMSW and upon which MMSW relies as input to its GHG modelling system.

4.6.3 Other Measurements

WPP program convenience, effectiveness and participation rates will be assessed by measuring the quantity of WPP collected as a percentage of WPP generated.

²⁶ Municipal reporting requirements are set out in Appendix B General Policies and Procedures for Collectors and Processors.

Municipal accessibility and fairness will be assessed by measuring the proportion of Saskatchewan municipalities that participate in the product management program and the proportion of Saskatchewan residents these municipalities service.

WPP program efficiency and sustainability will be assessed through the periodic audits described in Section 4.4.1.

Resident feedback will be assessed by monitoring visitors to the section of the MMSW website with information for residents and the number of emails, telephone calls and electronic submissions from residents using the 'contact us' option on the MMSW website as well as a summary of issues raised.

4.7 Program Launch Date

In order to prepare for the launch of the WPP Stewardship Plan, MMSW must:

- Build data management systems to accommodate steward reporting;
- Implement the first steward reporting process including data verification;
- Using data from the first steward reporting process, allocate program costs by material category and set steward fees; and
- Build data management systems to accommodate local government reporting.

Prior to the first steward reporting process, stewards need to ensure that their data management systems can identify the quantity of packaging and paper supplied to Saskatchewan households, separate from other regional distribution data and from packaging and paper supplied to Saskatchewan businesses. Once MMSW has set Year 1 steward fees, stewards must then ensure that these costs are incorporated into their corporate budgets in order to have the funds available to meet their obligations to MMSW.

In recognition of the sequence of tasks and activities described above, MMSW is proposing to launch²⁷ the WPP Stewardship Plan on the first day of the first quarter that occurs twelve months after the Minister of Environment approves the WPP Stewardship Plan.

4.8 Consultation

MMSW used a combination of mechanisms to consult with stakeholders during development of the product management program.

MMSW developed a website that was launched in May 2013 as a mechanism to provide information to stakeholders and for stakeholders to submit comments to and ask questions of MMSW.

²⁷ Fifteen of the nineteen submissions received from stakeholders included comments on the program launch date. Thirteen stewards proposed a January 1, 2015 launch date. The joint municipal response proposed an April 1, 2014 launch date. Comments from a non-government organization proposed a launch date six months following the Minister's approval.

During product management program development, MMSW collaborated with a working group consisting of representatives chosen by the Saskatchewan Urban Municipalities Association (SUMA), the Saskatchewan Association of Rural Municipalities (SARM) and the Association of Regional Waste Management Authorities of Saskatchewan (ARWMAS). MMSW provided the working group an opportunity to review and comment on a draft preliminary version of the product management program prior to posting the stewardship plan for consultation. MMSW also provided the working group with an opportunity to review and comment on a draft final version of the stewardship plan prior to submission to the Minister of the Environment.

A draft product management program was posted on June 4, 2013 and MMSW held a consultation workshop with simultaneous webcast on June 11, 2013. Stakeholders were encouraged to submit written comments on the draft stewardship plan following the workshop. Appendix D provides the submissions received, MMSW's responses to address the points raised and, where applicable, a description of revisions in the WPP Stewardship Plan.

MMSW will continue to dialogue with stakeholders during implementation of the program including:

- Preparing a guide for municipalities;
- Hosting a meeting with a webcast for municipalities to explain the funding formula and municipal reporting and invoicing requirements; and
- Holding a meeting with a webcast for stewards to present information on how to meet their legal obligations under the Regulation, the payment of fees and reporting requirements.

MMSW will post future opportunities for stakeholder dialogue on its website.

Appendix A – Glossary

<p>Brand</p> <p>Means a trademark.</p>
<p>Brand Owner</p> <p>With respect to a specific trademarked packaging or paper, where either bears a trademark means during any time;</p> <ul style="list-style-type: none">(a) A person Resident in Saskatchewan who is the holder of the registered trademark, or(b) A person Resident in Saskatchewan who is the licensee, in respect of the registered trademark, or(c) A person Resident in Saskatchewan, who is the licensee, in respect of the intellectual property rights of the unregistered trademark. <p>Where “licensee” includes a person who packages goods, the packaging or paper of which is obligated and bears a trademark, other than a packer or filler of Private Label Goods, and includes any person whose corporate name or business name registration contains the trademark.</p>
<p>Depot Collection Services</p> <p>Collection of WPP through:</p> <ul style="list-style-type: none">• Operation of a permanent facility at a fixed location that is open on a regular schedule to receive household WPP delivered by residents; or• Operation of a temporary facility that is open for a limited period of time to provide an opportunity for area residents to deliver household WPP.
<p>First Importer</p> <p>Means a person Resident in Saskatchewan, who imports into Saskatchewan:</p> <ul style="list-style-type: none">(a) a specific paper which is obligated, for which a Brand Owner does not exist, or(b) a specific good, the packaging of which is obligated, for which a Brand Owner does not exist;(c) and includes a person Resident in Saskatchewan who is the first to take title to, or possession, or control of such material or good, upon or after arrival in Saskatchewan from elsewhere.
<p>ICI</p> <p>Industrial, commercial and institutional.</p>
<p>Household Collection Services</p> <p>Collection of WPP:</p> <ul style="list-style-type: none">• Where single-family or multi-family households set WPP at the curb for collection by the

municipality or a municipality's designate; and

- Where multi-family households deliver WPP to a central storage area accessible by all residents of the multi-family complex and collection occurs from this central storage area by the municipality or a municipality's designate.

Municipality's Designate

Another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality.

Processing

Manual or mechanical alteration of WPP for the purpose of resource recovery.

Recovery Rate

Calculated as a percentage with the numerator representing the quantity of WPP diverted for recycling and the denominator representing the quantity of WPP generated or available for collection.

$$\text{Recycling Rate \%} = \frac{\text{Tonnes Diverted}}{\text{Tonnes Available for Collection}} \times 100$$

Appendix B – Collector and Processor Policies and Procedures

General Policies and Procedures for Collectors and Processors

A municipality receiving funding under this product management program or a municipality's designate²⁸ receiving funding under this product management program on behalf of a municipality shall report²⁹ to MMSW:

- The following information annually:
 - The number of households receiving curbside and multi-family building collection service of waste packaging and paper (WPP) and the number of households without collection service but with access to depot collection service;
 - The population of each collection service area;
 - The number of WPP material streams collected and the types of packaging and paper included in each stream collected from households receiving collection service and accepted from households receiving only depot collection service;
 - Frequency of collection service provided and type of set-out container used by residents; and
 - Locations of depots accepting residential WPP.
- The following information either monthly or quarterly as agreed:
 - Tonnes³⁰ of residential WPP collected from curbside and multi-family buildings and tonnes of residential WPP received from residents at depots by stream for each collection service area;
 - Tonnes³¹ of residential WPP shipped to recycling end-markets by type of packaging and type of paper and by recycling end-market³²;
 - Tonnes³³ of residential WPP rejected by recycling end-markets including the reason for the rejection; and
 - Amount of revenue received for the residential WPP shipped to recycling end-markets by type of packaging and type of paper.

Policies and Procedures for Household Collection Services

A municipality or a municipality's designate³⁴ shall ensure that:

- Waste packaging and paper (WPP) is collected from residents
- WPP collected from residents comprising

²⁸ A municipality's designate is another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality

²⁹ All information reported by a municipality is subject to review by MMSW's accountant (in addition to the information described in Section 4.4.1 Determining Municipal Costs and Revenues) if the municipality is selected as a representative municipality for the municipal group of which it is part.

³⁰ Based on weigh scale tickets. Estimates and projections are not acceptable.

³¹ Based on weigh scale tickets. Estimates and projections are not acceptable.

³² Recycling end-market information will be considered confidential.

³³ Based on weigh scale tickets. Estimates and projections are not acceptable.

³⁴ A municipality's designate is another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality

- Packaging as defined in Clause 2(1)(e) of *The Household Packaging and Paper Stewardship Program Regulations*
- Paper as defined in Clause 2(1)(f) of *The Household Packaging and Paper Stewardship Program Regulations*
- Packaging that contains Hazardous Waste or Special Waste is not accepted in the WPP collection system.
- Residents are informed that items that are not packaging or paper are not accepted in the WPP collection system and collectors ensure that these items do not represent more than 3% of collected WPP.
- All collected residential WPP is accounted for under the WPP program and may not be directed for separate management outside of the WPP product management program.
- WPP is collected and stored in a manner that maximizes material quality and commodity revenue.
- WPP collection occurs on a regular schedule on the same day and as close to a consistent time as possible.
- Collection containers provided to residents provide sufficient volume to accommodate generation within the context of collection frequency and shall not limit participation and WPP capture.
- Limits are not placed on the volume of WPP accepted from residents, except in the case where the WPP is considered to be from ICI activities.
- Residents receive uninterrupted collection service with the exception of statutory holidays.
- Residents are regularly informed about how to participate in the collection service.
- WPP collection services are delivered in a manner that contributes to a positive view of WPP recycling and encourages continued participation by residents.
- Collection vehicles
 - Are maintained in a satisfactory condition and have appropriate safety markings in accordance with current statutes, rules and regulations.
 - Are operated in compliance with all rules of the road including weight-related laws and regulations, such as axle bridging and loading requirements.
 - Are operated in compliance with applicable federal, provincial, local government laws, statutes, rules, regulations or ordinances, including those of agencies having jurisdiction over any aspect of the collection of WPP.
 - Are permitted as required by local, provincial or federal governments or any other regulatory body required in order to collect WPP.
 - Are operated in compliance with all environmental standards and regulations including local government noise bylaws.
 - Are operated in compliance with the Workers Compensation Act and all worker health and safety requirements and shall provide a safe working environment.
 - Are operated with the following insurance coverage:
 - Automobile liability insurance coverage with a minimum combined single limit for bodily injury and property damage of \$5,000,000 per accident;
 - Commercial general liability insurance coverage with limits no less than \$5,000,000 each occurrence and \$5,000,000 general aggregate;

- Workers Compensation coverage as required by the Workers Compensation Act; and
- Pollution liability insurance with limits no less than \$3,000,000 each occurrence and \$3,000,000 annual aggregate.

Policies and Procedures for Depot Collection Services

A municipality or a municipality's designate³⁵ shall ensure:

- Waste packaging and paper (WPP) is accepted from residents
- WPP accepted from residents comprising
 - Packaging as defined in Clause 2(1)(e) of *The Household Packaging and Paper Stewardship Program Regulations*
 - Paper as defined in Clause 2(1)(f) of *The Household Packaging and Paper Stewardship Program Regulations*
- WPP accepted from industrial, commercial and institutional (ICI) generators is kept separate from residential WPP and is not included in tonnes of WPP reported under the product management program³⁶.
- Packaging that contains Hazardous Waste or Special Waste is not accepted in the WPP collection system.
- Residents are informed that items that are not packaging or paper are not accepted in the WPP collection system and collectors ensure that these items do not represent more than 3% of collected WPP.
- All collected residential WPP is accounted for under the WPP program and may not be directed for separate management outside of the WPP product management program.
- WPP is collected and stored in a manner that maximizes material quality and commodity revenue.
- Limits are not placed on the volume of WPP accepted from residents, except in the case where the WPP is considered to be from ICI activities.
- Residents are regularly informed about how to utilize the depot collection service.
- WPP depot collection services are delivered in a manner that contributes to a positive view of WPP recycling and encourages continued participation by residents.
- WPP depot collection services are delivered in a manner that utilizes persons, bodies or other entities that provide employment and training to persons with disability and operate efficient and effective programs where this is deemed practical, effective, efficient and without risk to the persons involved, other depot staff or residents utilizing the depot.
- Depots
 - Are maintained in a satisfactory condition and have appropriate safety signage in accordance with current statutes, rules and regulations.

³⁵ A municipality's designate is another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality

³⁶ Quantities of WPP collected at depots will be monitored to identify atypical capture rates and, if identified, the amounts considered to be from ICI sources will be deducted prior to calculating funding due.

- Are operated in compliance with applicable federal, provincial, local government laws, statutes, rules, regulations or ordinances, including those of agencies having jurisdiction over any aspect of the collection of WPP.
- Are permitted as required by local, provincial or federal governments or any other regulatory body required in order to collect WPP.
- Are operated in compliance with all environmental standards and regulations including local government noise bylaws.
- Are operated in compliance with the Workers Compensation Act and all worker health and safety requirements and shall provide a safe working environment.
- Are operated with the following insurance coverage:
 - Commercial general liability insurance coverage with limits no less than \$5,000,000 each occurrence and \$5,000,000 general aggregate;
 - Workers Compensation coverage as required by the Workers Compensation Act; and
 - Pollution liability insurance with limits no less than \$3,000,000 each occurrence and \$3,000,000 annual aggregate.

Policies and Procedures for Processing Services

A municipality or a municipality's designate³⁷ shall ensure:

- All collected residential WPP is accounted for under the WPP program and WPP may not be directed for separate management outside of the WPP product management program.
- WPP is received and stored in a manner that maximizes material quality.
- WPP is processed and marketed in a timely, efficient and diligent manner.
- WPP is processed to meet recycling end-market specifications, maximize the quantity of WPP shipped to recycling end-markets and minimize the quantity of residue requiring disposal. The quantity directed to disposal does not represent more than 10% of collected WPP.
- WPP is marketed to recycling end-market to maximize commodity revenue received.
- Non-WPP in WPP received and residues from processing WPP are disposed in a facility that is operated in compliance with applicable provincial, local government laws, statutes, rules, regulations or ordinances.
- WPP processing services are delivered in a manner that utilizes persons, bodies or other entities that provide employment and training to persons with disability and operate efficient and effective programs where this is determined to be practical, effective, efficient and without risk to the persons involved or other processing staff.
- Processing facilities
 - Are maintained in a satisfactory condition and have appropriate safety signage in accordance with current statutes, rules and regulations.

³⁷ A municipality's designate is another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality

- Are operated in compliance with applicable federal, provincial, local government laws, statutes, rules, regulations or ordinances, including those of agencies having jurisdiction over any aspect of the collection of WPP.
- Are permitted as required by local, provincial or federal governments or any other regulatory body required in order to collect WPP.
- Are operated in compliance with all environmental standards and regulations including local government noise bylaws.
- Are operated in compliance with the Workers Compensation Act and all worker health and safety requirements and shall provide a safe working environment.
- Are operated with the following insurance coverage:
 - Commercial general liability insurance coverage with limits no less than \$5,000,000 each occurrence and \$5,000,000 general aggregate;
 - Workers Compensation coverage as required by the Workers Compensation Act; and
 - Pollution liability insurance with limits no less than \$3,000,000 each occurrence and \$3,000,000 annual aggregate.

Appendix C – Definition of Municipal Costs and Revenues³⁸

WPP Curbside Collection Service

The types of costs to be considered include:

- Where the WPP collection service is contracted, payments to contractors;
- The amortized cost³⁹ of WPP collection containers (carts/totes, boxes and reusable bags) if provided to residents by the local government;
- Where the WPP collection service is delivered with local government staff:
 - The amortized cost⁴⁰ of collection vehicles, allocated as required to represent the portion of vehicle capacity and utilization dedicated to WPP collection;
 - Collection operating costs including:
 - Salary, overhead and payroll burden associated with foremen and supervisors⁴¹
 - Salary, overhead and payroll burden associated with drivers
 - Training
 - Vehicle repair and maintenance
 - Fuel
 - Radio airtime
 - Licenses and permits
 - Insurance
 - Fleet management costs
 - Other (specify)

WPP Multi-Family Building Collection Service

The types of costs to be considered include:

- Where the WPP collection service is contracted, payments to contractors;
- The amortized cost⁴² of WPP collection containers (carts/totes, containers) if provided to multi-family buildings by the local government;
- Where the WPP collection service is delivered with local government staff:
 - The amortized cost⁴³ of collection vehicles, allocated as required to represent the portion of vehicle capacity and utilization dedicated to WPP collection;
 - Collection operating costs including:
 - Salary, overhead and payroll burden associated with foremen and supervisors⁴⁴
 - Salary, overhead and payroll burden associated with drivers
 - Training

³⁸ This definition will inform the compilation of data on municipal costs and revenues by accredited accountants as described in Section 4.4.2.

³⁹ Straight line amortization over 10 years.

⁴⁰ Straight line amortization over 7 years.

⁴¹ Staff that are routinely required to wear safety equipment to complete their duties.

⁴² Straight line amortization over 10 years.

⁴³ Straight line amortization over 7 years.

⁴⁴ Staff that are routinely required to wear safety equipment to complete their duties.

- Vehicle repair and maintenance
- Fuel
- Radio airtime
- Licenses and permits
- Insurance
- Fleet management costs
- Other (specify)

WPP Depot Collection Service

The types of costs to be considered include:

- Where the WPP collection service is contracted, payments to contractors;
- The amortized cost⁴⁵ of WPP collection containers (carts/totes, boxes and reusable bags) if provided to residents by the local government
- Where the WPP collection service is delivered with local government staff:
 - The amortized cost⁴⁶ of depot equipment, allocated as required to represent the portion of equipment capacity and utilization dedicated to WPP collection;
 - Collection operating costs allocated as required to depot collection including:
 - Salary, overhead and payroll burden associated with foremen and supervisors⁴⁷
 - Salary, overhead and payroll burden associated with depot staff
 - Training
 - Equipment and/or building lease/rent costs
 - Equipment rentals
 - Equipment repair and maintenance
 - Fuel
 - Insurance
 - Supplies
 - Other (specify)

WPP Post-Collection Services

The types of costs to be considered include:

- Where WPP transfer, transport, processing⁴⁸ and/or marketing services are contracted, payments to contractors for services consistent with the policies and procedures for collectors and processors;
- Where buildings used to transfer and/or process WPP are owned by the local government, the following costs allocated as required to represent the portion of building capacity and utilization dedicated to WPP transfer or processing
 - Amortized capital costs⁴⁹;

⁴⁵ Straight line amortization over 10 years.

⁴⁶ Straight line amortization over 10 years.

⁴⁷ Staff that are routinely required to wear safety equipment to complete their duties.

⁴⁸ Processing includes sorting, quality control and preparation for shipment to recycling end-markets.

- Licenses and permits
- Building repairs and maintenance;
- Fire alarm and sprinkler system maintenance;
- Building insurance;
- Site security;
- Utilities – hydro, water and gas;
- Where vehicles used to transport WPP are owned and operated by the local government:
 - The amortized cost⁵⁰ allocated as required to represent the portion of vehicle capacity and utilization dedicated to WPP transport;
 - Transport operating costs including:
 - Salary, overhead and payroll burden associated with foremen and supervisors⁵¹
 - Salary, overhead and payroll burden associated with drivers
 - Training
 - Vehicle repair and maintenance
 - Fuel
 - Radio airtime
 - Licenses and permits
 - Insurance
 - Fleet management costs
 - Other (specify)
- Where equipment used to process WPP is owned by the local government, the amortized cost⁵² allocated as required to represent the portion of equipment capacity and utilization dedicated to WPP processing;
- Where WPP transfer and/or processing facilities are operated with local government staff, operating costs including:
 - Salary, overhead and payroll burden associated with foremen and supervisors⁵³
 - Salary, overhead and payroll burden associated with sorting staff
 - Training
 - Equipment repair and maintenance
 - Equipment rental and leases
 - Equipment insurance
 - Miscellaneous supplies
 - Residue disposal
 - Shipping of commodity materials to recycling end-markets
 - Other (specify)

⁴⁹ Straight line amortization over 20 years.

⁵⁰ Straight line amortization over 10 years.

⁵¹ Staff that are routinely required to wear safety equipment to complete their duties.

⁵² Straight line amortization over 10 years.

⁵³ Staff that are routinely required to wear safety equipment to complete their duties.

Service Administration⁵⁴

The types of costs to be considered include salary, overhead and payroll burden associated with management staff⁵⁵ required to administer WPP collection contractors or local government staff delivering WPP collection services and WPP resident education.

Public Education

The types of costs to be considered include:

- Salary, overhead and payroll burden associated with staff who administer the WPP resident education program, allocated as required to represent time spent on WPP resident education activities;
- Costs incurred for resident education materials entirely focused on the WPP collection service including design, production, printing, distribution, insertion costs; and
- An allocated portion of costs for resident education materials that promote the WPP collection service as well as other local government activities and programs.

Revenue

The types of revenues to be considered include:

- Sales of WPP to commodity markets;
- Deposits received by municipalities for deposit containers collected with WPP and returned to the deposit container collection system;
- Sales of collection containers to residents;
- Fees and other charges; and
- Other (please specify).

⁵⁴ MMSW will utilize factors of 5% of program delivery costs for programs delivered with municipal staff and 3% of program delivery costs for programs delivered by contractors as the method to calculate service administration costs.

⁵⁵ Staff that are not routinely required to wear safety equipment to complete their duties.

Appendix D – Consultation Comments and Responses

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Collector/Processor	<p>We attended Multi-Material Stewardship Western's (MMSW) presentation on June 11, 2013 with respect to the DRAFT Waste Packaging and Paper Stewardship Plan.</p> <p>Glenda Gies indicated that MMSW will be responsible to the stewards that have chosen to be its members to deliver an efficient and effective Waste Packaging and Paper (WPP) product management program. Funding under the product management program will be available to municipalities.</p> <p>The Household Packaging and Paper Stewardship Program Regulations have principles that are missing from the WPP product management program. Specifically, Reg. 7(2)(d)(i) states that the product management program will take into account the social infrastructure of existing recycling programs in Saskatchewan.</p> <p>In Saskatchewan, there is a strong social conscience; in fact, the Government of Saskatchewan has an oft stated goal of making the province the best place in Canada in which to live for persons with disabilities. SARC provides a unifying force in our province with respect to the service delivery for those with disabilities. SARC and SARC member agencies pioneered recycling in Saskatchewan and the intervening decades have proven that it is a perfect fit for the capabilities of adults with intellectual disabilities while providing a pronounced benefit to all residents of the province.</p> <p>Glenda Gies stated the amount of funding to be made available will be 75% of the cost of what a comparable efficient and effective program would cost- if she said this once, she said this twelve times!</p> <p>The MMSW program as presented provides no incentive that would encourage municipalities to continue using the services of SARC recyclers unless they could continuously provide this service at less cost than a competing service. Instead of safeguarding the traditional role of these agencies in accordance with the spirit and intent of the regulations, the formula encourages automation and discourages providing work for individuals with intellectual disabilities.</p>	<p>Section 7(2)(d)(i) requires that the product management program describe how it will represent the interests of existing recycling service providers including describing how the social and capital infrastructure value of existing recycling operations in Saskatchewan will be taken into consideration. Section 4.2.3 of the WPP Stewardship Plan indicates that providing financial incentives to municipalities will support existing WPP collection and processing services which have been established through investments in social and capital infrastructure and will allow additional investment into social and capital infrastructure. The Household Packaging and Paper Stewardship Regulations states in Section 7(4)(a) that if a municipality operates an efficient and effective residential waste diversion program for waste packaging and paper, the municipality will be reimbursed for up to 75% of the net costs of operating the program. The Policies and Procedures for Depot Collectors in Appendix B require that municipalities ensure that "WPP depot collection services are delivered in a manner that utilizes persons, bodies or other entities that provide employment and training to persons with disability and operate efficient and effective programs where this is deemed practical, effective, efficient and without risk to the persons involved, other depot staff or residents utilizing the depot".</p>	<p>No revisions to WPP Stewardship Plan.</p>

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Collector/Processor	<p>We would like to begin by recognizing the work that has been done by MMSW Inc. to prepare the draft PMP for consultation purposes. We will speak to a number of points from the proposal and also include questions that we would like clarified.</p> <p>Throughout the report there are numerous references to “effective and efficient” services. We feel that a clear definition as to what this means should be of paramount value as municipalities, collector’s and processors try to design systems and programs that will be eligible for funding.</p> <p>Will the PMP allow for a new program or municipality to become involved and realize funding from MMSW if there was no recycling system in place in the Municipality prior to the program launch?</p> <p>There is reference to First Nations in the report, however little detail is provided as to how models or funding could work in the Northern half of Saskatchewan. There are significant operational issues relating to distance, roads and lack of infrastructure that will require special consideration other than the First Nations community just falling into a demographic calculation based on size of community. There are no indications of a system for registering, evaluating or monitoring downstream processors (salvage markets) for recovered materials. Guidelines should be included in the plan to ensure downstream processors are registered, audited and adhere to environmental standards established in the plan. This should be a priority to ensure material collected is actually recycled in an environmentally responsible manner, properly recycled in accordance with Canadian or equivalent regulations, and not shipped or sold to under developed, third world countries or non OECD Nations. There have been a number of data calls for Saskatchewan, funded by the Ministry of Environment, over the last four years. The statement that the data collected is unreliable (4.4.1) and the proposal to use Manitoba data for year one and two is of concern. There are a number of differences in the geography and population densities in Manitoba that are not reflected in Saskatchewan. Of major concern are the following factors:</p> <ul style="list-style-type: none"> • Over 70% of Manitoba’s population density is considered Urban and within two hours of Winnipeg. This equals cheaper transport and more efficient collection systems. • There is no deposit system in Manitoba for pop, water, juice and other beverage containers. This material is collected as part of curbside systems in Manitoba and affects the value of salvage material in Manitoba systems. The salvage value of curbside material collected is higher, therefore the 80% net cost to stewards is lower. The aluminum, PET, HDPE and tin have a greater value in the Manitoba curbside system due to there being no deposit on the containers and their subsequent larger volumes in the curbside programs. Comparatively speaking, there will be much less of this material in Saskatchewan’s municipal curbside systems as it will primarily be returned to SARCAN Recycling. This will lower the value of the salvage collected in the curbside/ municipal programs, which in turn should be reflected by a higher proposed rate from the stewards for Saskatchewan municipalities. 	<p>Re defining “effective and efficient” services, MMSW will define effective and efficient during implementation of the WPP Stewardship Plan, as operating data become available. Re new programs, the funding set out in the WPP Stewardship Plan would be available to a municipality that implements a new WPP collection service. Re First Nations, the funding set out in the WPP Stewardship Plan would be available to a First Nation that is operating a WPP collection service or implements a new WPP collection service. Re downstream processors, the WPP Stewardship Plan includes policies and procedures for processors in Appendix B. Under The Household Packaging and Paper Stewardship Regulations, municipalities are responsible for operating the WPP diversion program including selecting their downstream processor. One of the conditions of funding eligibility is the municipality’s compliance with the policies and procedures. Municipalities are responsible for ensuring that their contractors operate in a manner that ensures the municipality can be in compliance with the policies and procedures. Re use of Manitoba data: Based on analysis of Manitoba program composition data, 14% of collected tonnes are containers under deposit in Saskatchewan. Based on analysis of WPP collected by local governments in jurisdictions with deposit systems, 6% of collected tonnes are deposit containers that residents place into the WPP collection system rather than return for deposit. Therefore, it has been assumed that 8% of the tonnes collected in Manitoba WPP programs would, in Saskatchewan, be redirected by residents to the deposit container collection system. Manitoba costs will be adjusted to remove the commodity revenue associated with the containers that are under deposit in Saskatchewan and are expected to be returned for deposit by residents. The Household Packaging and Paper Stewardship Regulations require stewards to fund up to 75% of an efficient and effective program. A mature program is more likely to be efficient and effective than a start-up program. Section 2(e) of the Waste Paint Management Regulations defines waste paint as paint the consumer no longer wants including the original container in which the paint was purchased. This definition does not include paint containers that no longer contain waste paint. As such, empty paint containers are captured under the definition of packaging in The Household Packaging and Paper Stewardship Regulations. Programs in other jurisdictions accept empty paint containers in WPP collection systems without encountering the problems described.</p>	<p>Adjusted Manitoba costs to remove revenue associated with containers that are under deposit in Saskatchewan and that would be returned for deposit rather than be placed into the WPP collection system.</p>

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	<p>• Winnipeg has a mature curbside recycling program that has been in operation since 1995. To compare this mature, efficient program to those just starting up in Saskatchewan is an oversight. It does not recognize the significant amount of start-up and communications costs involved with launching a large, urban curbside program. As well, it fails to recognize a decade of capital investment, refinements in processes and operations, and development of salvage markets, to highlight only a few areas, all of which enhance efficiencies and drive down program costs. Early indications are the proposed 75% rate of \$92.00 per metric tonne for Saskatoon and Regina is only 1/3 of estimated program costs.</p> <p>• The costs of new programs in Saskatchewan will be higher as Saskatchewan is in an economic boom. All operating costs in Saskatchewan are high at this point. The cost of labour, transport, leasing, equipment and journeyman tradespersons are all at a premium in Saskatchewan. This is not reflected in using established rates from a different location.</p> <p>There is no reason for paint containers to not be included on the list of 'items not considered packaging' if oil containers are exempt from the program. Paint is a household hazardous waste that is already regulated under its own separate program in Saskatchewan. Including empty paint containers into municipal packaging and printed paper recycling programs will cause a great deal of confusion. It will undoubtedly lead to full paint containers (and likely other hazardous materials) going into municipal bins, which will contaminate other recyclables with a hazardous substance.</p> <p>There is recognition of clause 7.4e in the regulation requiring the PMP to maximize social benefits, including encouraging municipalities to contract with persons, bodies or other entities that provide employment and training for persons with disabilities and operate efficient and effective programs. This is referred to again in Representing Interests in 4.2.1 of the PMP. There are many communities and municipalities that partner with SARC agencies in Saskatchewan to provide recycling services. It is imperative that these existing partnerships are considered in the definitions of effective and efficient programs and the roll out of the PMP in Saskatchewan.</p> <p>We recommend that the PMP reflect the role, if any, that SARCAN Recycling will play. We question whether there has been consideration to utilize our existing infrastructure of 71 depots located in 63 communities in Saskatchewan. The SARCAN system could easily collect household glass and household tin province wide at its depots which will improve municipal program efficiencies and effectiveness. There are a number of advantages to a hybridized solution utilizing the SARCAN depots in removing glass and tin from the curbside programs and drop-off collection site programs. These advantages include proper sorting by colour, type (Pyrex, tempered, ceramic, regular container cullet), less contamination of other recyclables in single stream collection, less wear on collection and processing equipment and full recyclability of the material collected by SARCAN. SARCAN Recycling has downstream processors in place for the household glass and household tin we collect.</p>	<p>Re use of SARCAN, the policies and procedures for depot collectors in Appendix B makes specific reference to utilizing "persons, bodies or other entities that provide employment and training to persons with disability and operate efficient and effective programs where this is deemed practical, effective, efficient and without risk to the persons involved, other depot staff or residents utilizing the depot". Under The Household Packaging and Paper Stewardship Regulations, municipalities are responsible for operating the WPP diversion program including selecting their contractors.</p>	

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	<p>SARCAN Recycling is willing to develop a funding formula and work with MMSW on a provincial basis to develop a Hybrid program, similar to BC, which could compliment and assist the municipalities. Currently, SARCAN Recycling diverts over 375 metric tonnes of household glass and tin across the province per year. This could easily be increased with proper marketing and promotion province wide. In closing, we appreciate being given the opportunity to provide comments on MMSW's draft plan. SARCAN Recycling looks forward to working with MMSW as part of Recycle Saskatchewan and working closely with MMSW through the development and roll out of the PMP to help ensure the success of the PMP and the long-term relationship between SARCAN Recycling, MMSW Inc. and the residents of Saskatchewan.</p>		

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Local Government	<p>The Local Government Working Group (LGWG) has reviewed the draft Waste Packaging and Paper Stewardship Plan for the Multi-Material Recycling Program (MMRP), and has several concerns with the current draft. One general comment about the draft plan is that it does not provide enough information on “how” MMSW will manage the MMRP, which is extremely important for local governments as the service providers and who are required to contribute 25 per cent of the program cost. Some of our concerns were expressed at the June 11 consultation in Saskatoon. However, we would like to take this opportunity to highlight them again. We have also attached section-by-section comments for your consideration.</p> <p>Use of Manitoba data We continue to believe that Manitoba data is not suitable for Saskatchewan, despite the rationale provided by the Multi-Material Stewardship Western (MMSW). The Manitoba Multi-Material Stewardship Manitoba (MMSM) is a mature recycling program. Saskatchewan’s MMRP is just beginning, and will have higher costs than an established program like MMSM. We believe that Manitoba data does not reflect Saskatchewan. For example, the calculation used for the MMSM includes beverage container revenue, but this revenue is not part of the MMRP. Transportation costs will also be much higher with Saskatchewan demographics’ being so different from Manitoba’s, and with a greater number of urban and rural governments.</p> <p>That being said, we understand that it might be useful to extrapolate Manitoba’s data to help transition Saskatchewan into the MMRP. Therefore, we recommend that if Manitoba data is absolutely needed, it be in the short term, while MMSW gathers the same data for Saskatchewan.</p> <p>We propose that certain population groups, such as cities, should be able to submit actual data for reimbursement within their first year of MMRP operation. This would mean that these groups would receive their reimbursement based on the Manitoba data in the beginning of the first year. Once these local governments could provide the actual data, their reimbursement would be based on their actual program costs, instead of an estimate. The real data would be reconciled with the payments already made at the end of 12-month period. The difference would be either topped up by MMSW or paid back by the local governments.</p> <p>We see this proposal as a fair compromise. It allows local governments with the capacity to provide real data to be reimbursed based on what they recycle, and it provides a basis for MMSW to launch the program without further delay. Under this proposal, real Saskatchewan data would be used as soon as possible instead of waiting two years. Furthermore, it provides incentives for local governments to collect accurate statistics about their operations so they can receive the full benefit of the MMRP. When the Saskatchewan data is entered for the third year of operations what will be the benchmark/starting point for this data?</p> <p>Definitions of efficiency and effectiveness The words efficient and effective appear frequently in the draft plan. However, there are no definitions of efficiency and effectiveness. Local governments need to know how efficient and effective programs would be defined and when both measurements would be incorporated to calculate reimbursement, or they risk not being reimbursed 75 per cent of actual costs of recycling. Without knowing the definitions and benchmarks for efficiency and effectiveness, local governments cannot enjoy the full benefit of the MMRP.</p>	<p>Re use of Manitoba data: Based on analysis of Manitoba program composition data, 14% of collected tonnes are containers under deposit in Saskatchewan. Based on analysis of WPP collected by local governments in jurisdictions with deposit systems, 6% of collected tonnes are deposit containers that residents place into the WPP collection system rather than return for deposit. Therefore, it has been assumed that 8% of the tonnes collected in Manitoba WPP programs would, in Saskatchewan, be redirected by residents to the deposit container collection system. Manitoba costs will be adjusted to remove the commodity revenue associated with the containers that are under deposit in Saskatchewan and are expected to be returned for deposit by residents. Manitoba costs will be used as a surrogate for the cost of an efficient and effective program in Saskatchewan for the first two years of program implementation while data are compiled and definitions of efficient and effective are developed.</p> <p>Re definitions of efficiency and effectiveness: The words efficient and effective are used in the WPP Stewardship Plan because these terms are used in the Regulations. MMSW will define effective and efficient during implementation of the WPP Stewardship Plan, as operating data become available.</p> <p>Re funding formula: The formula is set out in the table in Section 4.4.3. To calculate the funding available, a municipality would multiply the dollar value in the Municipal Funding column for the population category into which the municipality falls by the tonnes of WPP (net of ICI) collected.</p> <p>Re threshold for ICI waste: In the absence of Saskatchewan data, MMSW will utilize data from other jurisdictions to set the ICI factor.</p> <p>Re industry members on the advisory committee: The MMSW Board is intended to represent obligated stewards, and given the provision in the Regulations for voluntary stewards, stewards obligated under the Regulations may not be from Saskatchewan. MMSW will determine the number of steward representatives on the Advisory Committee.</p> <p>Re implementation date: Thank you for your comment regarding the program launch date.</p> <p>Re governance transition from MMSW to the Canadian Stewardship Services Alliance: Financing the implementation of a stewardship program requires commitments from stewards. While trade associations led the effort in Saskatchewan by establishing MMSW, stewards, through their new association, CSSA, will finance WPP Stewardship Plan implementation.</p> <p>Re 2.2 Board of Directors: The CSSA board will include a representative from Saskatchewan.</p>	<p>Adjusted Manitoba costs to remove revenue associated with containers that are under deposit in Saskatchewan and that would be returned for deposit rather than be placed into the WPP collection system. Described the methodology to deduct ICI WPP from WPP collected prior to calculating funding for residentially generated WPP. Added Section 4.7 Program Launch Date. Referenced up to 3 steward representatives on Advisory Committee. Added reference to adjusting for under and over payments. Added reference to 3% and 5% admin factors as footnote in Appendix C.</p>

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	<p>Funding Formula We continue to feel that the funding formula used to calculate reimbursement needs to be shared with local governments. This information is not in the draft plan and we would like to see more transparency on these financial plans. Without having the right financial information, many councils cannot properly determine MMRP's impact on their recycling operations.</p> <p>Threshold for Industrial, Commercial and Institution (ICI) Waste Though the MMRP is intended for household recycling, ICI fibre does enter the recycling stream through depot locations. The draft plan states that the payment to local governments will be reduced by a certain percentage to accommodate ICI content, but this threshold has yet to be determined, and it is not in the current draft. Local governments need to know that this threshold is realistic for their operations. There needs to be a percentage factor in the program plan and the program plan needs to speak about the ability of the local government to have that percentage adjusted according to their verification of the amount of ICI in their collection volumes.</p> <p>Industry members on the advisory committee The draft plan highlights that three local-government associations (the Saskatchewan Urban Municipalities Association, Saskatchewan Association of Rural Municipalities and the Association of Regional Waste Management Authorities of Saskatchewan) will each nominate two qualified representatives to serve on the advisory committee. A total of six members will reflect the interests of local governments (urban and rural), and regional waste management authorities. However, the draft plan does not provide details on how many industry members will serve on the advisory committee.</p> <p>Industry representation on MMSW The provincial regulations state that Saskatchewan interests must be adequately represented, but there is only one Saskatchewan board member on the MMSW Board of Directors. LGWG questions whether there is adequate Saskatchewan industry representation on the MMSW Board.</p> <p>Implementation Date Local governments have been waiting for the MMRP for many years now and we would like to see the program implemented as soon as possible. The LGWG is committed to continued work with MMSW on finalizing the program plan, and as a partner in implementing the program. To date, the draft plan has not provided an implementation date. The LGWG recommends that the MMRP be implemented within six months of the approval of the program plan by the Minister</p> <p>Governance Transition from MMSW to the Canadian Stewardship Services Alliance On June 26, 2013, the working group learned of a new governance arrangement between MMSW and the national stewardship organization Canadian Stewardship Services Alliance (CSSA). Under this model, MMSW will be a subsidiary of the CSSA. The MMSW Chair cited many benefits of being part of CSSA, including funding for program implementation, and leveraging technical expertise to better support the program.</p> <p>After learning about this proposed transition, the working group questions the timing of this announcement. MMSW was incorporated in 2010; it had plenty of time to arrange for necessary organizational and financial supports to implement the MMRP before the program plan development stage. The current draft plan and information provided after June 26 does not give enough information on the decision-making relationship between CSSA and the MMSW local office in Saskatchewan.</p>	<p>Re 2.3 Number of stewards: Establishing an effective dialogue between municipalities and stewards is important to the success of the WPP Stewardship Plan and the Advisory Committee is the key forum for that dialogue.</p> <p>Re 2.5 collaborating with other product management programs: MMSW interprets 'other product management programs' to be stewardship programs managing non-WPP.</p> <p>Re 3.1 packaging materials: Various types of packaging, food and non-food, can contain product residue when collected. Paper serviettes are excluded under Clause 2(2) of the Regulations which indicates that paper does not include "paper products that, by virtue of their anticipated use, could become unsafe or unsanitary to recycle".</p> <p>Re 3.3 sources of waste paper and packaging: The footnotes list facilities that are considered commercial or institutional and are therefore excluded from the definition of residential. In the absence of Saskatchewan data, MMSW will utilize data from other jurisdictions to set the ICI factor to be utilized at program launch.</p> <p>Re 4.1 efficiency and effectiveness: MMSW will define effective and efficient during implementation of the WPP Stewardship Plan, as operating data become available.</p> <p>Re 4.2.3 recycling service providers: The Regulations specify that the funding is to be paid to a municipality or another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality. The organization eligible to receive funding under the WPP product management program is either a municipality or a municipality's designate. MMSW will provide funding to a municipality's designate, rather than the municipality, only with appropriate authorization from the municipality on whose behalf the designate is operating residential WPP services. The municipality or the municipality's designate receiving the funding must meet the following requirements: provide WPP collection services to residents and recycle the collected WPP; and be in compliance with the collector and processor policies and procedures set out in Appendix B.</p> <p>Re 4.3 Collector and Processor Policies and Procedures: The contract between MMSW and a municipality will be prepared after the WPP Stewardship Plan is approved by the Minister.</p> <p>Re 4.4.2 Determining Municipal Costs and Revenues for Year 3 and Beyond: The approach proposed in the WPP Stewardship Plan is intended to compile more data that are more reliable than data based on the interpretation of questions by various municipal staff.</p>	

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	<p>For example, what is the level of authority for local Saskatchewan staff to make decisions about MMRP? For what items do local staff need approval from the CSSA Board of Directors? Furthermore, the working group is unsure about how the Advisory Committee (per the regulation) will fit under the CSSA model. For example, is the Advisory Committee co-chaired by a board member from CSSA or MMSW?</p> <p>Due to the last minute notice, it is hard for the working group to assess how <input type="checkbox"/> or whether <input type="checkbox"/> a national stewardship organization would adequately meet local governments' needs in Saskatchewan. At this point, we are uncomfortable supporting MMSW becoming a part of the CSSA due to insufficient information on the proposed governance model.</p> <p>We appreciate the opportunity to share our feedback, and look forward to more discussion with you on the program plan.</p> <p>2.2 Board of Directors: Reg. 7.2 c(3): how is "sufficient" Sask. representation-addressed?</p> <p>2.3 Number of stewards: LGWG (Local government Working Group) recommends max. 2; previous LGWG meeting notes indicate only one (co-chair)</p> <p>2.5 Collaborating with Other Product Management Programs (refer to Regulation 7.2 (d)) Should this list also include municipalities and their existing programs?</p> <p>3.1 Packaging materials: disposable food service containers contaminated with food are included? Paper serviettes are cellulosic fibre and should be included (uncontaminated).</p> <p>3.3 Sources of Waste paper and Packaging Footnotes 8, 9 and 10 indicate that the commercial/institutional facilities listed are included, even though they are considered commercial or institutional operations???</p> <p>What will the discount be for ICI in the comingled fibre mix, and where is it shown in the plan?</p> <p>4.1 Efficiency and Effectiveness: What are the benchmarks? How are they determined? More detail of pay-out formulae is needed. Will efficiency and effectiveness standards be applied in the first two years of operation (prior to acquiring Sask. data)?</p> <p>4.2.3 Recycling Service Providers: Funding could be paid directly to service providers or through municipality? Please Clarify.</p> <p>4.3 Collector and Processor Policies and Procedures: A contractual agreement is mentioned, and municipalities would like to preview contract (could it be included in Appendix of PMP);</p> <p>4.4 .1 Determining Municipal Costs and Revenues for Years 1 and 2: 88% of the population was represented by the datacall 2012, but the right questions weren't asked: Saskatchewan peculiarities were not accounted for; data was not ground-proofed by "experts"</p> <p>4.4.2 Determining Municipal Costs and Revenues for Year 3 and Beyond Recommend that for the first 3 years a full province-wide datacall be carried out; ground truthing of the data has to take place by a multi-sectoral group to ensure the data's integrity; Will MMSW top up if they have short-paid a municipality?</p> <p>Funding eligibility: Does the municipal designate refer to a regional waste authority or to a contracted entity (SARCAN, Loraas, etc.)? Municipal contracts need to identify the need on the part of contractors to make changes to program to improve cost effectiveness and efficiency.</p> <p>4.4.3 Funding chart: using one MB municipality's costs/tonne for the largest \$/tonne category doesn't make sense for SK; municipalities could partner with others to qualify for the population base that pays out a higher rate</p>	<p>Re funding eligibility: The Regulations specify that the funding is to be paid to a municipality or another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality. The organization eligible to receive funding under the WPP product management program is either a municipality or a municipality's designate. MMSW will provide funding to a municipality's designate, rather than the municipality, only with appropriate authorization from the municipality on whose behalf the designate is operating residential WPP services. The municipality or the municipality's designate receiving the funding must meet the following requirements: provide WPP collection services to residents and recycle the collected WPP; and be in compliance with the collector and processor policies and procedures set out in Appendix B.</p> <p>Re 4.4.3 funding chart: Winnipeg is more similar to Regina and Saskatoon than to other Saskatchewan municipalities. As funding values increase as population decreases, partnering with other municipalities to shift into the next higher population category will result in lower funding.</p> <p>Re 4.6.1 Municipal program costs will be compiled by accountants as described in Section 4.4.2 rather than through monthly, quarterly or annual reporting by municipalities.</p> <p>Re 4.6.2 Greenhouse Gas Emissions: MMSW must first develop a data tracking and modelling system for GHG emissions associated with Saskatchewan's residential WPP collection and recycling activities before determining what is required of municipal staff and whether training will be required.</p> <p>Re definition of Collection Rate: Section 4.6.1 indicates that MMSW will report the WPP recovery rate. The recovery rate is calculated using the tonnes collected as the numerator and total WPP generated as the denominator to yield a percentage. As WPP generated are tonnes available for collection, this information will be published.</p> <p>Re definition of depot collection services: Stewards support delivery of depot collection using staffed depots.</p> <p>Re Collector and Processor Policies and Procedures: Noted.</p> <p>Re Policies and Procedures for Household Collection Services: In the absence of Saskatchewan data, MMSW will utilize data from other jurisdictions to set the ICI factor to be utilized at program launch.</p> <p>Re pollution liability insurance: An entity typically purchases insurance coverage under a single policy for all of the entity's activities.</p>	

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	<p>4.6.1 Measurement: No cost measurements are listed (also not in reg's)—how do you establish cost effectiveness?</p> <p>4.6.2 Greenhouse Gas Emissions: Who will train municipal staff how to do this? What does this entail?</p> <p>Appendix A – Glossary: Collection Rate: Will “Tonnes Available for Collection” be publicized? Depot collection services definition is inaccurate (most in SK are unmanned 24/7)</p> <p>Appendix B – Collector and Processor Policies and Procedures: quarterly preferable Policies and Procedures for Household Collection Services: what's the ICI discount %? Pollution liability insurance: \$3,000,000:is this realistic? Is this required on a “per site” basis, or by program, i.e. regional waste authorities have multiple sites within their boundaries? Policies and Procedures for Depot Collection Services: separation of ICI material in depots isn't feasible. As a result, will those programs not qualify for funding?</p> <p>Appendix C: WPP Depot Collection Service: vehicles have not been listed Service Administration: the 3% (contractor) and 5% (municipally-run) thresholds have not been shown. Revenue: what “other” might this include? From the webcast: The term “deminimus” was used; does this apply to municipalities or stewards</p>	<p>Re Policies and Procedures for Depot Collection Services: As the WPP Stewardship Plan is for household WPP, stewards require that household WPP be segregated from ICI WPP where feasible and practical. Where segregation of household and ICI WPP is not feasible and practical, a factor will be applied to remove the WPP assumed to be from ICI sources prior to calculating the funding due.</p> <p>Re Appendix C: WPP Depot Collection Service: Transporting of WPP from depots is part of post-collection services.</p> <p>Re Service Administration: Appendix C defines costs and does not describe the methodology to calculate costs.</p> <p>Re Revenue: Other revenue could, for example, include grants.</p> <p>Re the term “de minimis”: The administrative de minimis described during the June 11 workshop would apply to stewards. Municipalities, as brand owners of printed material distributed to residents, are stewards under the Regulations and therefore the term de minimis may apply to municipalities in their role as stewards.</p>	
Non-government organization	<p>It is unfortunate that these regulations have been passed with a 75/25 funding split between stewards and municipalities, just at a time when other jurisdictions have enacted WPP programs that require stewards to be responsible for 100 percent of the program. This has just happened in British Columbia. Quebec has moved its program gradually from a 50/50 split to its current 100 percent. Ontario is revamping its system and proposes 100 percent steward funding as well.</p> <p>If this is the way that WPP programs are evolving across the country, (it is certainly the way non-WPP stewardship programs have gone), it may be wise to set up the program so that a future transition to 100 percent steward funding could be easily accommodated. It is certainly something to keep in mind when helping municipalities set up infrastructure for programs that may not be their responsibility to operate in the future.</p> <p>Implementation date: You asked during the consultation for recommendations on when the program should be implemented, keeping in mind the work that needs to be done to make it operational. We suggest April 1, 2014. It is, as you requested, the beginning of a quarter and should provide time for the background work to be prepared.</p> <p>Saskatchewan municipalities and recyclers have been waiting for this type of program for many years and we would hate to see it delayed any longer.</p> <p>Specific comments by clause: 2.1 Stewards: The confusion at the consultation meeting points to the need for a clearer definition of steward, especially as the term will be applied in Saskatchewan to entities that become brand owners by virtue of the distribution of paper containing their letterhead. Also, if a de minimus provision is intended, the specific level isn't necessary in the plan, but the intention to establish one could be included. 2.2 Board of Directors: This section is vague. It does not even specify the number of directors. It does not discuss Saskatchewan representation, even though the regulations (7.2.c.iii) require “details to</p>	<p>Thank you for your comments proposing an April 1, 2014 program launch date. Re 2.1 Stewards: MMSW is collaborating with other provincial programs to harmonize steward services which include the definition of 'steward'. The questions at the June 11 meeting reflect the introduction of the concept of brand owner and first importer to a new set of stewards. Definitions of brand, brand owner and first importer have been added to the Glossary. Re 2.2 Board of Directors: The board is intended to represent obligated stewards. Given the provision in the Regulations for voluntary stewards, stewards obligated under the Regulations may not be from Saskatchewan. Re 2.3 Advisory Committee: MMSW will determine the number of steward representatives. As stated earlier, obligated stewards may not be from Saskatchewan. Stewards would be represented on the Advisory Committee to facilitate dialogue among stewards and municipalities. Re 2.4 Management Structure: The programs in Ontario, Manitoba and BC are transitioning to centrally managed services as described in Section 2.4. Following approval of the WPP Stewardship Plan by the Minister, MMSW will hire the key staff position who will then organize the local office. Re 3.1d Items not considered packaging: Section 2(e) of the Waste Paint Management Regulations defines waste paint as paint the consumer no longer wants including the original container in which the paint was purchased. This definition does not include paint containers that no longer contain waste paint. As such, empty paint containers are captured under the definition of packaging in The Household Packaging and Paper Stewardship Regulations. When empty antifreeze containers are included in another stewardship regulation, they will be</p>	<p>Adjusted Manitoba costs to remove revenue associated with containers that are under deposit in Saskatchewan and that would be returned for deposit rather than be placed into the WPP collection system. Described the methodology to deduct ICI WPP from WPP collected prior to calculating funding for residentially generated WPP. Added Section 4.7 Program Launch Date. Referenced up to 3 steward representatives on Advisory Committee. Added definitions of brand, brand owner</p>

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	<p>satisfy that there will be, in the minister’s opinion, sufficient Saskatchewan representation on the board of directors”. Given that this is a program regulated by Saskatchewan for the benefit of Saskatchewan municipalities and citizens, SWRC believes that the majority of MMSW board members should be from Saskatchewan.</p> <p>There is also a governance best practice of including some independent members, selected for their professional backgrounds, on organizational boards. Having independent board members on the MMSW board was discussed by the Multi-Material Advisory Group. We encourage MMSW to adopt this approach.</p> <p>2.3 Advisory Committee: The Advisory Committee composition is specific with respect to non-steward representatives, but doesn’t specify the number of ‘representatives of stewards of residential packaging and paper’ that will be part of the Advisory Committee. This should be clearly stated. In addition, if the purpose of the Advisory Committee is “to serve as a Forum through which Saskatchewan stakeholders are kept informed of stewardship program activities...”, then all the members of the Advisory Committee should be from Saskatchewan.</p> <p>Further, as stewards have direct input into MMSW via the Board of Directors, which has decision-making authority, what purpose would be served by having stewards on the Advisory Committee, which has no decision-making power?</p> <p>2.4 Management Structure: The regulations (7.2.b) require the program plan to provide details of the management structure. This section does not contain many details with respect to the functions of the local office, nor does it specify who will handle the administration/back office work or how it will be carried out. Will there be a local CEO/Executive Director that reports to the MMSW board? What other functions will be handled at the local level? What does ‘centrally managed’ mean? Does this happen now with other programs?</p> <p>3.1d Items not considered packaging: Added to this list should be empty paint containers, which are already part of the Saskatchewan Paint Recycling Program (SPRP). Saskatchewan consumers have an option to return both paint and paint containers under SPRP and if empty paint containers are included in municipal recycling programs, this will cause confusion. Also, empty paint containers typically still contain paint residue, which is considered a hazardous waste, and should be dealt with as a separate stream from typical household containers. Also added to this list should be empty antifreeze containers. It is our understanding that antifreeze and containers are scheduled to be added to the Used Oil Collection Regulations by the end of 2013.</p> <p>4.1 Approach to Addressing Approval Standards: This is an awkward section. The regulations require MMSW to ensure various program performances, but the only mechanism MMSW is proposing to use is funding and the funding formula. Might there be other tools that could help achieve maximum diversion, convenient and effective programs, etc.? (A few that come to mind are market research/development, cooperative marketing desk, specifying a minimum basket of goods, there are many other possibilities.) If the intent of the regulation is that MMSW (and not the municipalities) be responsible for all the outcomes, then some additional creativity might be required here.</p> <p>4.3 Collector and Processor Policies and Procedures: Will service providers be audited to test compliance with the policies and procedures?</p> <p>4.4.1 Costs and Revenues for Years 1 and 2: The proposal to use Manitoba data to determine</p>	<p>excluded from the WPP stewardship program. Re 4.1 Approach to Addressing Approval Standards: The Regulations specify that municipalities are to operate WPP programs. Operating WPP programs includes marketing WPP. Re 4.3 Collector and Processor Policies and Procedures: The contract between MMSW and a municipality will include the right to audit the municipality's data relating to WPP. However, municipalities may contract with another party to provide WPP collection and processing. As MMSW will not have a commercial arrangement with municipal sub-contractors, MMSW will not have access to these sub-contractors for purposes of audits. Re 4.4.1 Costs and Revenues for Years 1 and 2: Manitoba’s costs represent programs that have been operating for many years and therefore are more likely to be efficient and effective than the programs recently implemented in Saskatoon and Regina. Re 4.4.2 Year 3 and beyond: MMSW will define effective and efficient during implementation of the WPP Stewardship Plan, as operating data become available. Re 4.4.3 Funding Formula: The funding formula includes consideration of municipal size and relative costs associated with municipal size which should encourage delivery of convenient, effective and efficient WPP collection and recycling services taking into consideration Saskatchewan’s demography and geography and delivery of WPP collection in all areas of Saskatchewan using the collection system most appropriate to each area’s demography and geography. The availability of funding will encourage diversion of residentially generated waste packaging and paper from municipal landfills and will provide entrepreneurial opportunities for municipalities and those that operate residential WPP programs on behalf of municipalities. The funding formula is intended to reimburse municipalities for up to 75% of the net costs of operating the program in relation to the efficiency and effectiveness of their WPP collection and recycling system. Re Collection and Recycling Options: Up to 75% of an efficient and effective program. Re 4.4.5 Dispute Resolution: The Rules for Stewards will set out the process for managing disputes related to steward data and fees. The Rules, including the dispute management process, are part of the steward services that are being harmonized with other provincial programs. Re 4.6 Measurement: Measuring participation rates involves tracking set-outs by address which would add administrative burden to municipalities. The quantity of WPP collected will be tracked for purposes of funding payments and represents a reasonable surrogate for measuring the level of convenience, effectiveness and participation rates. Re Appendix B: Hazardous or special waste requires special handling and packaging containing hazardous or special waste cannot be included in a WPP collection program. If packaging that once held hazardous or special waste is empty and is no longer considered hazardous, the empty containers could safely be included in the WPP collection system. Re collection vehicles: MMSW will be developing a GHG model in the third</p>	<p>and first importer to Glossary.</p>

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	<p>payments for Years 1 and 2 is based on 1) lack of confidence in current datacall information and 2) the rapidly changing recycling situation in Saskatchewan. At the consultation meeting, we heard from the cities of Saskatoon and Regina that the proposal to use MMSM payments would cover less than a third of their current recycling costs. Two things to note from this statement: 1) by using Winnipeg numbers for Saskatoon and Regina, you're not even close, and 2) these two cities know what their costs are. Although Saskatoon and Regina's curbside programs are new, their costs are based on long term contracts (7 and 10 years). Their cost structures are not going to be any different in year 3 than in year 1 and 2. If you are still not sure, you can get real costs to service more than 50% of the provincial population by sending in accountants to audit these two cities and using the actual results to calculate year 1 and 2 payments. This would not take a great deal of effort to accomplish. In addition, some Regional Waste Authorities and individual municipalities have mature programs with good records that would be more relevant to Saskatchewan costs than those from Manitoba. It should be noted that Saskatchewan's population density is much lower than Manitoba's and would be expected to generate higher recycling costs.</p> <p>4.4.2 Year 3 and beyond: How will you assess the efficiency and effectiveness of programs with the data from the accountants? What is your definition of an efficient program? of an effective one? If you are prepared to modify funding rates to recover any overpayments in the first two years of the program, are you also prepared to modify them to pay out any underpayments from the first two years of the program?</p> <p>4.4.3 Funding Formula: This section is vague. Can you include how you are going to achieve these goals with the funding formula (or at least give some examples of what you are thinking)?</p> <p>-Collection and Recycling Options: What does 'these collection options can be accommodated ... in the funding formula' mean? Does this mean that municipalities will receive 75% of their recycling costs, regardless of the collection options they use?</p> <p>4.4.4 Steward Financing: We are happy to see the steward fees partially reflect sustainable package design, with higher fees being applied to non-recyclable, non-sustainable packaging types. (To the extent that Saskatchewan has any influence on packaging choices, at least it sends the correct signal).</p> <p>4.4.5 Dispute Resolution: This section is written to handle financial disputes with municipalities. Might there be disputes from stewards, over fee levels or in/out package decisions? Would the same procedure be followed?</p> <p>4.6 Measurement: This regulation requires the plan to explain how the following will be determined and measured: program convenience, effectiveness, efficiency, fairness, sustainability, municipal accessibility, participation rates and resident feedback. To make it clearer, the plan should offer a working definition of each of these, as well as discussing their measurement, as the regulations aren't specific about what is meant by each of these terms. The plan proposes to use return rates to determine convenience, effectiveness and participation rates. How? Surely other measures would be more useful ... measures of the proportion of the population with access to WPP recycling programs, actual participation rates, measures of public awareness of recycling programs ...</p> <p>Appendix B -could you clarify "packaging that contains Hazardous Waste or Special Waste" – what is included here? Will the program accept empty packaging if the original product was hazardous? We</p>	<p>year of WPP Stewardship Plan implementation and may be able to take an informed position on collection vehicle fuel at that time. Re processing disposal allowance: MMSW will be compiling data on the quantity of WPP collected and, of the PPP collected, the portion that is marketed and the portion that is disposed. Should operating data from the various programs operating in Saskatchewan support a lower residue rate, MMSW will consider adjusting the rate.</p>	

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	<p>don't want HSW over-defined so that we end up with similar consumer confusion as Ontario did with their expanded HSW program.</p> <p>-collection vehicles – given that the regulations are concerned with minimizing greenhouse gas emissions, you might consider including statements about encouraging collection vehicles to be high efficiency and/or to use alternative, lower-GHG fuels.</p> <p>-processing disposal allowance – ten percent of WPP going to landfill is very high. Our current SK single stream processors are able to achieve 3% residual rates. We encourage you to raise the standard to 3-5% to maximize diversion from landfill.</p>		
Steward	<p>On behalf of Hain Celestial Canada, we are writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan.</p> <p>Implementing new programs is complex and requires a significant amount of preparation. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program. Hain Celestial Canada appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.
Steward	<p>On behalf of Nestle Purina PetCare Canada, we are writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship Program. We recommend that MMSW support a January 1, 2015 launch date in the program. Implementing new programs is complex and requires a significant amount of preparation. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions reinforces these timing requirements. Nestle Purina PetCare Canada appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to promote a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Steward	<p>On behalf of Dare Foods Limited we are writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan. Implementing new programs is complex and requires a significant amount of preparation. As voluntary stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program. Dare Foods Limited appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	<p>Thank you for your comments proposing a January 1, 2015 program launch date.</p>	<p>Added Section 4.7 Program Launch Date.</p>
Steward	<p>On behalf of S.C. Johnson, I am writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship Program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan. Implementing new programs is complex and requires a significant amount of preparation. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program. S.C. Johnson appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	<p>Thank you for your comments proposing a January 1, 2015 program launch date.</p>	<p>Added Section 4.7 Program Launch Date.</p>

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Steward	<p>We are pleased to provide our comments on Multi-Material Stewardship Western's (MMSW) Draft Waste Packaging and Paper Stewardship Plan.</p> <p>As brand owner and first importer, we are volunteer steward of this EPR plan and would likely sign up with the collective once we have considered the details of the plan and the proposed program execution.</p> <p>We are pleased to provide input on the launch date for the new MMSW program. We like to have realistic timelines particularly reporting timelines. We urge you to generate industry consensus on the launch date of the program. We recommend that given the work needed including sorting out domestic, IC&I, curbside and depot collection, orphan materials - current methodologies and the ensuing public consultations required, that the start date of the new Saskatchewan packaging program be no sooner than Jan 1, 2015. Implementing packaging stewardship programs is complex and requires a significant amount of time, resources and investments to successfully prepare for the delivery and implementation of any new program. We would like the program to be successful. MMSW will need to build data management systems to accommodate steward and local government reporting; to implement the first steward reporting process including data verification and audit; and to compile data to support cost allocation and fee setting. You need time to prepare for compliance with the program. You will have to compile data on the quantity of packaging supplied to Saskatchewan residents; modify the internal systems and programs to track designated materials and packaging to be captured under the program; and to budget accordingly. These activities require planning, preparation and coordination and most importantly consultations with those obligated by the program, all of which will take time. We as national brand owners, are obligated by and actively engaged in packaging stewardship programs across Canada, which often leaves us time and resource constrained. The impacts and timelines of the new and amended EPR programs in BC, Quebec and Ontario are unknown and as businesses require stability and predictability, it is critical that we be provided with sufficient time to implement and adapt to the program.</p>	<p>Thank you for your comments proposing a January 1, 2015 program launch date.</p>	<p>Added Section 4.7 Program Launch Date.</p>

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Steward	<p>On behalf of Staples Canada and Staples Advantage (Corporate Express), we are writing to provide our input on the launch date for Multi-Material Stewardship Western's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan.</p> <p>Implementing a new program is complex and requires a significant amount of preparation. Staples Canada and Staples Advantage (Corporate Express) will have to compile significant data on the quantity of packaging we supply through both our own product lines and for those products that we import into the province. In addition, we will have to modify our internal systems to track designated packaging and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions has demonstrated that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program.</p> <p>Staples Canada and Staples Advantage (Corporate Express) appreciate the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.
Steward	<p>On behalf of Mondelez Canada Inc. I am writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan. Implementing new programs is complex and requires a significant amount of preparation. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program. Mondelez Canada Inc. appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government. Thank you.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Steward	<p>On behalf of PepsiCo Beverages Canada we are writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship program.</p> <p>We recommend that MMSW propose a January 1, 2015 launch date in the program plan.</p> <p>Implementing new programs is complex and requires a significant amount of preparation. Although our beverage containers are included in the SARCAN deposit-return program, much of our packaging will be obligated under the new program. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us.</p> <p>Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program.</p> <p>PepsiCo Beverages Canada appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	<p>Thank you for your comments proposing a January 1, 2015 program launch date.</p>	<p>Added Section 4.7 Program Launch Date.</p>
Steward	<p>On behalf of Sobeys, I am writing to provide our input on the launch date for Multi-Material Stewardship Western's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan.</p> <p>Implementing a new program is complex and requires detailed planning and preparation. The foundational work will require us to compile a large volume of data on the quantity of packaging we supply through both our own product lines and for those products that the company imports into the province. In addition, we will have to adapt our internal systems to track designated packaging and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions has demonstrated that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment, to successfully prepare for the implementation of any new program.</p> <p>Sobeys appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	<p>Thank you for your comments proposing a January 1, 2015 program launch date.</p>	<p>Added Section 4.7 Program Launch Date.</p>

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Steward	<p>On behalf of Canada Safeway Limited, we are writing to provide our input on the launch date for Multi-Material Stewardship Western's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan.</p> <p>As we have witnessed in Manitoba and British Columbia, implementing a new program is complex and requires a significant amount of preparation. Safeway will have to compile significant data on the quantity of packaging we supply through both our own product lines and for those products that we import into the province. In addition, we will have to modify our internal systems to track designated packaging and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions has demonstrated that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program.</p> <p>To ensure the program is implemented flawlessly, we strongly encourage MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.
Steward	<p>On behalf of PepsiCo Foods Canada we are writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan. Implementing new programs is complex and requires a significant amount of preparation. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly.</p> <p>Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program. We at PepsiCo Foods Canada appreciate the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government. Thank you.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.
Steward	<p>On behalf of Heinz Canada, we are writing to provide our input on the launch date for MMSW's Draft Waste Packaging and Paper Stewardship program. We recommend that MMSW propose a January 1, 2015 launch date in the program plan. Implementing new programs is complex and requires a significant amount of preparation. As stewards of this new program we will have to compile our data on the quantity of packaging supplied, modify our internal systems to track designated packaging, and budget accordingly. Ensuring that adequate and realistic timelines are provided is a critical issue for us. Our experience in other jurisdictions shows that implementing new packaging stewardship programs is complex and requires a significant amount of time, resources and investment to successfully prepare for the implementation of any new program. Heinz Canada appreciates the opportunity to provide our input on the launch date for the new program and we urge MMSW to propose a January 1, 2015 launch date in the final program plan to be submitted to government.</p>	Thank you for your comments proposing a January 1, 2015 program launch date.	Added Section 4.7 Program Launch Date.

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Steward Association	<p>Thank you for your recent information event and webinar outlining the revised June 11, 2013 MMSW Waste Packaging and Paper Stewardship Plan. Magazines Canada's comments follow: 1. Free Riders – We have noted new language used to define Stewards and ask for further clarification of the meaning and intent of this language as it specifically relates to the capture of foreign, free riding publishers who distribute and sell magazines into Saskatchewan without paying their way. Of particular interest is the following clause: “3 c) if there is no brand owner as described in (a) or person that first imports the packaging or paper as described in clause (b), the purchaser of the packaging or paper outside of Saskatchewan that purchases it for use in Saskatchewan”. As you know from past experience in other provincial jurisdictions, free riding is a very real and costly issue for the magazine industry and yet no meaningful solution has been found resulting in an unfair and untenable situation for magazine publishers. Simply put, no Steward should be required to pay for materials and costs that are not of their making and outside of their control. Please advise MMSW's stance on this continuing, expensive and troubling issue, specifically how the proposed Steward definition will solve this problem and, if it doesn't, who pays for free rider volume/costs? 2. Cost Data – Given a current lack of cost data within Saskatchewan and the subsequent proposal to use Manitoba cost data as a surrogate over the next two years, how does MMBC plan to handle any revenue shortfalls or surpluses? Who pays for possible shortfalls (and when) and how will potential overages be treated? 3. Harmonization – The magazine industry supports provincial harmonization across all facets of their plans, not just harmonization of administrative activities. With five provincial jurisdictions now functioning and more likely to follow, complexities continue to mount, particularly for small businesses such as Manitoba magazine publishers that are ill equipped to properly resource or manage these activities. 4. De Minimis – We support implementation of a fair de minimus for small magazine publishers who are not well equipped to administer any such plan. 5. Advisory Committee – We support the creation of an Advisory Committee populated by stakeholder representatives of the materials mandated within the regulations. Magazines Canada can help. 6. Communication Strategies – The magazine industry is open to discussion and collaboration relating to the creation and implementation of a communication strategy and plan going forward to help build much needed awareness and education of MMSW's plan. Magazines are not packaging but rather a trusted, welcomed communication channel valued by their readers. Saskatchewan and Canadian magazine industries are committed to the efficient recycling of their products and to working closely with MMSW and other Producers to ensure an efficient, fair and equitable Producer-based business model.</p>	<p>1. Free Riders – Consistent with Ontario and British Columbia, the definition of first importer references the party resident in Saskatchewan that takes first title, possession or control of the obligated material. This will ensure that the companies responsible for importing offshore magazines into Saskatchewan will be held responsible for that material. 2. Cost Data – MMSW will estimate the number of Saskatchewan municipalities in each of the funding formula population groups and the number of tonnes each municipality is likely to collect in order to estimate Year 1 costs and calculate steward fees. If the tonnage estimate is incorrect (high or low), the Year 2 budget and steward fees will be adjusted accordingly. 3. Harmonization – MMSW is collaborating with other provincial programs to advance harmonization efforts wherever feasible. 4. De Minimis – Thank you for your comment. 5. Advisory Committee – Thank you for your offer of assistance with the creation of an Advisory Committee populated by stakeholder representatives of the materials mandated within the regulations. 6. Communication Strategies – Thank you for your offer of collaboration relating to the creation and implementation of a communication strategy.</p>	<p>Added definitions of brand, brand owner, first importer to Glossary.</p>
Steward Association	<p>On behalf of Food & Consumer Products of Canada (FCPC) and our members operating in Saskatchewan, we are writing to provide our comments on Multi-Material Stewardship Western's (MMSW) Draft Waste Packaging and Paper Stewardship Plan, as posted for stakeholder review and consultation (revised as of June 11, 2013). FCPC appreciates the opportunity to provide input on the launch date for the new MMSW program. Ensuring that adequate and realistic timelines are provided for program implementation is a critical issue for our members. For the reasons stated below, FCPC recommends that the new Saskatchewan packaging program launch on January 1, 2015. Implementing packaging stewardship programs is complex and requires a significant amount of time,</p>	<p>Thank you for your comments proposing a January 1, 2015 program launch date.</p>	<p>Added Section 4.7 Program Launch Date.</p>

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
	<p>resources and investments to successfully prepare for the delivery and implementation of any new program.</p> <p>MMSW will need to build data management systems to accommodate steward and local government reporting; to implement the first steward reporting process including data verification; and to compile data to support cost allocation and fee setting. Obligated stewards of the program, including FCPC members, will require time to prepare for compliance with the program. They will have to compile data on the quantity of packaging supplied to Saskatchewan residents; modify their internal systems and programs to track designated materials and packaging to be captured under the program; and to budget accordingly.</p> <p>These activities require planning, preparation and coordination with those obligated by the program, all of which will take time. In addition, as national brand owners, FCPC members are obligated by and actively engaged in packaging stewardship programs across Canada. Today's stewardship landscape is quickly changing as our members are currently preparing for a new packaging program in British Columbia (launching May 2014); as well as other possibly significant changes to packaging programs in Quebec, as a result of proposed amendments introduced earlier this year, and in Ontario given the introduction of the new Waste Reduction Act currently being consulted on. The impacts and timeliness of these changes are unknown and as businesses require stability and predictability, it is critical that MMSW and stewards be provided with sufficient time allocate already constrained resources to implement the program.</p> <p>FCPC has expressed concerns in other jurisdictions with the accelerated timelines that are often provided for developing and implementing programs. As a member of the MMSW Board of Directors, FCPC is committed to developing an effective and successful program that will meet government, industry, municipal and public objectives. In order to deliver a successful program, FCPC strongly recommends that MMSW propose a January 1, 2015 launch date in its program plan to be submitted to government for approval.</p> <p>Thank you for the opportunity to provide our comments. If you have any questions or require further information, please don't hesitate to contact me.</p>		

Stakeholder Sector	Question and/or Comment	Response	Reflected in WPP Stewardship Plan
Supplier to Stewards	<p>(1) At 4.4.4 Steward Financing (page 14) it is stated that MMSW will communicate with stewards and non-resident brandowners to explain how fees are determined and applied. We understand that, but we would ask that MMSW extend that communication to non-steward stakeholders such as material suppliers, processors and end-markets represented by national industry associations such as PPEC. Details of the cost allocation model and fees applied are level-playing field issues for us and effect our members commercially.</p> <p>(2) We would appreciate at the earliest, details of how MMSW plans to allocate costs between readily recyclable materials and WPP for which there are no or limited end-markets (4.4.4), and what fee distinction MMSW plans to make, if any, between commingled materials and those coming from a dual/multi-stream collection.</p> <p>(3) At 4.4.2 (page 11) it is stated that municipalities operating “efficient and effective” programs will receive up to but not more than 75% of their net operating costs. Can we assume that municipalities operating programs that are not “efficient and effective” will be receiving less than 75% of their net costs? In other words, the municipalities will be grouped in demographic bands and judged accordingly (as in Ontario)?</p>	<p>(1) Thank you for your comment. (2) The process to allocate costs and set steward fees for the WPP Stewardship Plan is underway. (3) The WPP Stewardship Plan proposes the funding available to local governments for the first two years of the program in Section 4.4.3 under the heading 'Funding Formula for Years 1 and 2'. MMSW is proposing to implement a process in Years 1 and 2, described in Section 4.4.2, to compile the data necessary to inform revisions to the funding formula. MMSW will use the data compiled to assess the efficiency and effectiveness of municipal programs and adjust the funding formula.</p>	No revisions to WPP Stewardship Plan.