

March 19, 2021

The Saskatchewan Ministry of Environment is conducting a review of *The Household Packaging and Paper Stewardship Program Regulations* and Multi-Material Recycling Program. As part of the review process, the ministry is conducting a Red Tape Reduction Review to specifically collect feedback from businesses that are obligated under the regulations (i.e. stewards) to participate in the program to identify possible ways to reduce regulatory administrative burdens.

Below is a link to an online survey containing questions for you to answer on several subject areas, including extended producer responsibility, business exemptions, designated materials, targets and recovery rates, non-residential waste and reducing regulatory red tape.

Finding ways to reduce red tape is one of the most important measures a government can take to help promote and support a vibrant economy. A good regulatory environment helps Saskatchewan businesses innovate, grow and remain competitive. Because of this, we are seeking your help to reduce red tape in Saskatchewan.

Red tape is not always easy to define and isolate. Some examples of red tape include:

- rules that significantly exceed government's mandate to protect public health, safety, well-being and the environment (i.e. overregulation);
- rules or barriers that impact a business's competitiveness or ability to grow and innovate;
- regulation that exceeds the benefit achieved from the regulation;
- paperwork that is burdensome, unnecessary or ineffective;
- rules that are unclear, confusing or overly complex;
- rules that do not allow businesses to be flexible and use innovation or technology to achieve a desired outcome;
- rules that are outdated, not relevant, obsolete or not enforced;
- rules that duplicate requirements or create gaps in service;
- there is no clear explanation or reason for the rule;
- rules, requirements or government contact information is not easily accessible or available online, or may be out of date; and
- the issue can be better addressed by the private sector than through government regulation.

The Government of Saskatchewan is working to remove as much red tape as possible. Although red tape cannot be completely eliminated, it can be greatly reduced. Government is preventing red tape from entering the system by using best practices when a regulation is being developed, and finding red tape that already exists in the system. This means reviewing every business-related regulation and removing all unnecessary compliance requirements.

The Ministry of Environment is currently reviewing *The Household Packaging and Paper Stewardship Program Regulations* and its associated policies and procedures. We are interested in any ideas you may have for improving the program and reducing red tape and regulatory barriers in your business.

A link to *The Household Packaging and Paper Stewardship Program Regulations* is available here: <https://publications.saskatchewan.ca/#/products/66360>

To participate in the business survey containing questions related to red tape, as well as other questions for the review, please visit the survey link below and answer the first question with “I represent a steward/business”. A copy of the Red Tape Survey questions has been provided below. Feedback must be submitted by April 30, 2021.

<https://survey.alchemer-ca.com/s3/50097071/MMRP-Survey>

For more information about the complete review of *The Household Packaging and Paper Stewardship Program Regulations* and Multi-Material Recycling Program, as well as the upcoming engagement sessions, please visit Saskatchewan.ca/recycling.

Multi-Material Stewardship Western (MMSW) distributed this survey on behalf of the Ministry of Environment; however, please submit your replies directly through the online survey or written feedback to the Ministry of Environment at waste.management@gov.sk.ca. Your participation in the survey is appreciated, and your feedback is anonymous and confidential. Your input will help the government better understand key interests and concerns to be considered during regulatory review. Thank you for participation in the review process. We look forward to your responses.

If you have any questions regarding the survey, please contact Brienne Bennett, at brienne.bennett@gov.sk.ca or 306-787-7032.

Sincerely,



Brady Pollock
Executive Director, Environmental Assessment and Stewardship

Enclosure: Business Survey Questions for Red Tape Review

Business Survey

About You

1. Who do you represent (please select one only)?

- Obligated business (“steward”)
- Small business that has been provided with an exemption under the regulations
- Business/industry association
- Other: _____

2. What business or industry association do you represent (optional)?

3. How many employees work at the business you are representing?

- 0-10 employees
- 10-25 employees
- 26-49 employees
- 50-99 employees
- 100+ employees

4. How familiar are you with *The Household Packaging and Paper Stewardship Program Regulations*?

- This is the first time I have heard about the regulations
- Somewhat familiar
- Familiar
- Very familiar

Areas for Consideration

The ministry is looking for feedback on a number of topics including full producer responsibility, business exemptions, designated materials, targets and recovery rates, incorporating non-residential waste, and other areas outlined below. Additional areas for consideration may be revealed through the consultation process.

Full Extended Producer Responsibility (EPR)

- 5. The current regulations and program require businesses obligated by the regulations to provide funding for up to 75 per cent of the cost of municipal recycling programs for packaging and printed paper.**

- (a) What would be some of the opportunities and challenges associated with shifting towards a full producer responsibility program in Saskatchewan?

6. One of the actions of the national [Strategy on Zero Plastic Waste](#) is to facilitate consistent extended producer responsibility (EPR) programs for plastic.
- (a) What elements of EPR need to be consistent across Canada? _____
 - (b) What elements need to be specific to Saskatchewan? _____

Business Exemptions

There are exemptions for Saskatchewan-based small businesses that have a single point of retail sale, or generate less than \$2 million gross revenue annually, or produce less than one tonne of packaging and paper annually. If a business meets one of the criteria, the business is not obligated to participate in the Multi-Material Recycling Program.

7. Should there be any exemptions or alternatives available for businesses that meet certain criteria?
- Yes or No
 - (a) Please explain: _____
8. If there continues to be exemptions for businesses under a certain revenue threshold, what should be the revenue threshold to exempt businesses from participating in the program (choose one)?
- Less than \$5 million gross revenue annually
 - Less than \$2 million gross revenue annually (current revenue threshold)
 - Less than \$1 million gross revenue annually
 - All producers should be required to participate
 - Other amount: _____
9. Should there be exemptions for businesses that have a single point of retail sale in Saskatchewan?
- Yes or No
 - (a) Please explain: _____
10. Should there be exemptions for businesses that produce less than one tonne of packaging and paper annually?
- Yes or No
 - (a) Please explain: _____
11. Are there other criteria that should be considered when determining if a business qualifies for an alternative or exemption (optional)? _____

12. What steps could the government take to ensure a level playing field among all producers, including online marketplaces that sell into Saskatchewan?
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Designated Materials

Materials designated in the regulations include packaging composed of glass, metal, paper, boxboard, cardboard, paper fiber or plastic or any combination of those materials. In the regulations, “paper” includes flyers, brochures, booklets, catalogues, telephone directories, newspapers, magazines, paper fiber and paper used for copying, writing or any other general use.

13. Should the scope of obligated materials be broadened to include packaging-like products, such as food storage bags and containers, or single-use plastic items, such as drinking straws and plastic cutlery?
- Yes or No.
 - (a) If yes, which packaging-like products do you suggest are the highest priority for inclusion? _____
14. Are there any packaging or packaging-like products you believe should be exempt from being obligated by the regulation?
- Yes or No.
 - (a) If yes, why? _____

Recovery Rates and Performance Targets

15. How can the regulations and program best encourage producers to reduce the use of hard-to-recycle or non-recyclable packaging, such as flexible packaging with plastic laminates or multi-material packaging? _____

Non-Residential Waste

16. In the regulations, businesses and organizations who supply or distribute packaging and paper to residential households in Saskatchewan are obligated to participate in the program. Do you think packaging and paper supplied or distributed to the industrial, commercial and institutional (ICI) sector should be included in the regulations?
- Yes or No.
 - (a) Please explain: _____

Other Areas to Consider

17. Are there other areas that we should consider during the review of the regulations and program that have not been captured by the discussion paper or survey? Please explain.

Red Tape Reduction

As part of the review process, the ministry is conducting a Red Tape Reduction Review to specifically collect feedback from businesses obligated under the regulations to participate in the program to identify possible ways to reduce regulatory administrative burdens. The following questions are related to reducing regulatory red tape.

18. Can you identify within *The Household Packaging and Paper Stewardship Program Regulations*, or its associated policies and procedures, a specific item that is negatively impacting your business or industry? If so, please describe.
19. Do you have suggestions on how the Government of Saskatchewan can remove the red tape you identified in the previous question and make it easier for you to comply with government regulations? If so, please describe.
20. How much time does your business spend per week complying with the regulation now under review (e.g. filling out forms, applying for permits, reporting business activity, etc.)?
 - Less than 1 hour
 - 1 to 5 hours
 - 6 to 10 hours
 - 11 to 20 hours
 - 21 to 40 hours
 - More than 40 hours
 - Not sure/I don't know
21. Have you had to make any changes or adaptations to your processes to comply with the regulations? If so, please describe _____
22. What is the estimated annual cost for your business to comply with this regulation?
 - Less than \$500
 - \$500 to \$1,000
 - \$1,001 to \$5,000
 - \$5001 to \$10,000
 - \$10,001 to \$50,000
 - \$50,001 to \$100,000
 - More than \$100,000
 - Not sure/I don't know
23. How would you rank the Government of Saskatchewan's goal of reducing red tape as an important issue facing your business?
 - Within the top 1-2 issues
 - Within the top 5 issues
 - Within the top 10 issues
 - Not in the top 10 issues
 - Not sure/I don't know

24. Do you have any other comments or suggestions regarding regulatory red tape?

Thank You

Thank you for participating in this survey. Your feedback will be collected by the Ministry of Environment. The ministry will analyze and compile the data so that your feedback is kept anonymous. All feedback will be gathered into a summary report, which will be made available online at saskatchewan.ca. If you wish to receive the summary report directly, please leave your name and contact information below.

Name: _____

Email Address: _____