



## Waste Packaging and Paper Stewardship Plan

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Submitted to the Minister of Environment



# Waste Packaging and Paper Stewardship Plan

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# 1 Introduction

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## 1.1 Regulations

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 program<sup>1</sup> on their behalf or develop and operate a product management program to manage their own packaging and paper products.

## 1.2 Minister's Additional Requirements

On December 18, 2014, the Minister announced the following additional requirements:

- A permanent exemption for any business that generates less than \$2 million in gross annual revenue, or generates less than one tonne of household packaging and paper annually or operates a single retail store;
- A two-year transition exemption from reporting and paying fees, with the exception of payment of an annual \$500 flat fee, for newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million; and
- Approval of stewardship fees by the Minister during the two-year transition exemption period.

To reflect the categories of businesses set out in the Minister's December 18 announcement, during the transition exemption period Multi-Material Stewardship Western (MMSW)<sup>2</sup> will<sup>3</sup>:

- Accept the registration of newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million for a payment of \$500 per year. These businesses are referred to as 'Registrants'.
- Execute Membership Agreements with businesses with annual revenue above \$5 million. These businesses are obligated to report the quantity of packaging and paper supplied to Saskatchewan households and to pay fees to MMSW for this material. These businesses are referred to as 'Members'.

To accommodate the transition exemption for newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million, the WPP

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

<sup>2</sup> See Section 2 for information on MMSW.

<sup>3</sup> See also Section 2.1.

Stewardship Plan will be implemented in the following stages:

- Transition Period
  - As the Transition Period began on January 1, 2015, this WPP Stewardship Plan will operate under the Transition Period from the program launch date
- Post-Transition Phase 1
  - Begins on January 1, 2017 on condition that the following Transition Period requirements expire
    - the exemption from reporting and paying fees (with the exception of \$500 annually) for newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million; and
    - the Minister's approval of MMSW's steward fees<sup>4</sup>
- Post-Transition Phase 2
  - Begins when payments to municipalities are based on costs for Saskatchewan municipalities to operate an efficient and effective WPP program

These and related revisions are described in the remaining sections of the WPP Stewardship Plan. This revised WPP Stewardship Plan replaces MMSW's Stewardship Plan dated December 12, 2013. This revised WPP Stewardship Plan is predicated on approval by the Minister on or before October 16, 2015 to enable a January 1, 2016 program launch date.

The term 'Transition Period', when used in the remaining sections of this revised WPP Stewardship Plan, means the period from the launch of the WPP Stewardship Plan until the conditions are met to end the Transition Period and begin Post-Transition Phase 1.

## 2 The Stewardship Agency

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Multi-Material Stewardship Western Inc. is a not-for-profit stewardship agency established under the Saskatchewan *Non-Profit Corporations Act* formed in order to discharge the obligations of its Members 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 administrative functions related to operating stewardship programs 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 sustainable producer responsibility programs in Canada.

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<sup>4</sup> Should either the exemption from reporting and paying fees (with the exception of \$500 annually) for newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million or the Minister's approval of MMSW's steward fees extend past January 1, 2017, the Transition Period will continue until both of these requirements expire.

## 2.1 Stewards

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

- a) “the brand owner<sup>5</sup> with respect to the packaging or paper, unless the brand owner is a non-resident brand owner<sup>6</sup>;
- 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”.

For purposes of this 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)<sup>7</sup>.

An organization can volunteer to be a steward under this WPP Stewardship Plan to relieve the brand owner or first importer of the obligations arising from *The Household Packaging and Paper Stewardship Program Regulations*. A voluntary steward is not subject to the permanent or transition exemptions established by the Minister.

To reflect the Minister’s announcement on December 18, 2014, this WPP Stewardship Plan is based on the following categories of stewards:

- Exempt permanently – business that generates less than \$2 million in gross annual revenue in Saskatchewan or less than one tonne of packaging and paper supplied annually to households in Saskatchewan or operates a single retail store in Saskatchewan;
- Exempt from reporting during the Transition Period<sup>8</sup> – newspapers with annual revenue over \$2 million in Saskatchewan and businesses with annual revenue between \$2 million and \$5 million in Saskatchewan; and
- Obligated –
  - During the Transition Period, businesses, other than newspapers, with annual revenue above \$5 million; and
  - During Post-Transition Phases 1 and 2, businesses with annual revenue above \$2M.

MMSW will execute Membership Agreements with obligated businesses with annual revenue above \$5 million during the Transition Period. These businesses are obligated to report the

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<sup>5</sup> 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.

<sup>6</sup> Clause 2(1)(d) defines non-resident brand owner as a brand owner who does not carry on business in Saskatchewan.

<sup>7</sup> Refer to the Glossary in Appendix A for definitions of these terms.

<sup>8</sup> Subject to registration and payment of an annual \$500 fee.

quantity of packaging and paper supplied to Saskatchewan households and to pay fees to MMSW for this material. These businesses are referred to as 'Members'.

MMSW will accept the registration of newspapers with annual revenue over \$2 million and businesses with annual revenue between \$2 million and \$5 million for a payment of \$500 per year during the Transition Period. These businesses, referred to as 'Registrants', are not required to report the quantity of packaging and paper supplied to Saskatchewan households. These businesses can, at any time, execute an agreement with MMSW to become Members, with the obligation to report the quantity of packaging and paper supplied to Saskatchewan households and to pay fees to MMSW for this material.

During Post-Transition Phases 1 and 2, MMSW will execute Membership Agreements with obligated businesses with annual revenue above \$2 million. These businesses are obligated to report the quantity of packaging and paper supplied to Saskatchewan households and to pay fees to MMSW for this material. These businesses are 'Members'.

## **2.2 Board of Directors**

Multi-Material Stewardship Western (MMSW), the organization submitting this Waste Packaging and Paper Stewardship Plan, is governed by a board of directors comprising representatives of brand owners and stewards obligated under *The Household Packaging and Paper Stewardship Program Regulations*. Directors are well versed in their fiduciary responsibilities and are selected on the basis of their skills and experience as well as their sectoral and regional representation and are charged with the responsibility of acting as fiduciaries for MMSW.

In addition to receiving fiduciary oversight from a board of directors, MMSW will participate in and provide support to an Advisory Committee comprising stakeholders operating in the Province of Saskatchewan who are directly impacted by the WPP Stewardship Plan and whose views are integral to affecting continuous improvement in the program's operation.

## **2.3 Advisory Committee**

An Advisory Committee will be established to serve as a forum through which Saskatchewan stakeholders are kept informed of WPP Stewardship Plan 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 MMSW Members<sup>9</sup>. A minimum of one representative will be from an MMSW Member operating 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 assist 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. Should unanticipated issues arise, the co-chairs may convene additional meetings. 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.

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 residential WPP to attend a meeting of the Advisory Committee. Ministry of the Environment representatives may attend Advisory Committee meetings as observers.

The Advisory Committee will submit a report to the board at least annually providing feedback on the operation of the WPP Stewardship Plan 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;

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<sup>9</sup> Brand owners and first importers based in Saskatchewan and voluntary stewards based outside of Saskatchewan.

- The definition of municipal costs and revenues;
- The regional waste authorities and municipalities to be selected 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 4.4.5;
- The proposed methodology to be developed during Post-Transition Phase 1 to measure efficiency and effectiveness of municipal residential WPP collection and recycling programs;
- Proposed revisions to the payment formula for local governments to be implemented during Post-Transition Phase 2; and
- Proposed amendments to the WPP Stewardship Plan that affect local government programs collecting and recycling 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 WPP Stewardship Plan on behalf of its Members. MMSW will administer the implementation of the WPP Stewardship Plan through:

- Local staff 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 Programs<sup>10</sup>**

MMSW will participate in Recycle Saskatchewan in order to collaborate with SARCAN Recycling, the Electronic Products Recycling Association, 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.

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<sup>10</sup> 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.

## 3 Waste Packaging and Paper

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### 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 Member 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 household<sup>11</sup>;
- (c) Transportation, distribution or tertiary packaging that goes to the household<sup>12</sup>;
- (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;
  - 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 together<sup>13</sup>.

For 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 purposes of the WPP Stewardship Plan:

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<sup>11</sup> Multiple packages of product sold in a unit, often wrapped in film plastic.

<sup>12</sup> 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.

<sup>13</sup> 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.

- Beverage containers governed by The Litter Control Designation Regulations (1998);
- Empty oil<sup>14</sup> containers, empty antifreeze containers and empty diesel exhaust fluid containers as governed by The Used Petroleum and Antifreeze Products Collection Regulations (2013);
- Transportation and distribution packaging 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 to 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)”.

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 seasonally<sup>15</sup>; and

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<sup>14</sup> “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).

- Multi-family dwellings including rental, co-operative, fractional ownership, time-share, condominium<sup>16</sup> and seniors residences<sup>17</sup>.

## 4 Product Management Program

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### 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 payment 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
- 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 payments will be made to municipalities. Sections 4.4.1 to 4.4.5 describe the manner in which payments will be made 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 Sections 4.4.1 to 4.4.5 which describe the manner in which payments will be made to municipalities.

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<sup>15</sup> Excluding vacation facilities, such as hotels, motels, cottages and cabins, which are considered commercial operations.

<sup>16</sup> 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.

<sup>17</sup> Excluding residences at which medical care is provided, such as nursing homes, long-term care facilities and hospices, which are considered institutions.

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)(f) relates to encouraging entrepreneurial opportunities within Saskatchewan. This standard is addressed in Sections 4.4.1 to 4.4.5 which describe the manner in which payments will be made 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 WPP Stewardship Plan represents the interests of the Government of Saskatchewan and the residents of Saskatchewan by:

- Providing payments to municipalities for services to operate convenient, effective and efficient WPP recycling services for Saskatchewan residents appropriate to Saskatchewan's demography and geography;
- Providing payments to municipalities for services to collect and recycle residential WPP which will divert waste from municipal landfills, thereby extending the life of the landfills, reducing release of leachate and emission of greenhouse gases, and conserving resources;
- Providing payments to municipalities for services that can include contracting with persons, bodies or other entities that provide employment and training to persons with disabilities and operate efficient and effective programs;
- Providing payments to municipalities for services that encourage entrepreneurial opportunities associated with the collection and recycling of residential WPP; and
- Measuring and tracking greenhouse gas emissions associated with collecting and recycling residential WPP during Post-Transition Phase 2.

### ***4.2.2 Municipalities***

The WPP Stewardship Plan represents the interests of municipalities by:

- Providing payments to municipalities for services to deliver curbside and multi-family building collection services and/or to operate depots to accept WPP delivered by residents, appropriate to Saskatchewan's demography and geography;
- Providing payments to municipalities for services to collect and recycle 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 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 during Post-Transition Phases 1 and 2.

#### **4.2.3 First Nations**

The WPP Stewardship Plan represents the interests of First Nations by:

- Providing payments to First Nations for services to deliver curbside and multi-family building collection services and/or to operate depots to accept WPP delivered by residents appropriate to Saskatchewan`s demography and geography;
- Providing payments to First Nations for services to collect and recycle residential WPP reducing demand for disposal capacity;
- Compiling and reporting the data described in Section 4.6.1, providing a source of information for 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 during Post-Transition Phases 1 and 2.

#### **4.2.4 Recycling Service Providers**

The WPP Stewardship Plan represents the interests of recycling service providers by:

- Providing payments to municipalities for services to operate existing residential WPP collection and processing services which have been established through investments in social and capital infrastructure in Saskatchewan;
- Providing payments to municipalities for services to collect and recycle 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.

#### **4.2.5 Environmental Organizations**

The WPP Stewardship Plan represents the interests of environmental organizations by:

- Providing payment to municipalities for services to provide convenient, effective and efficient recycling services for Saskatchewan residents;
- Providing payment to municipalities for services to collect and recycle residential WPP which will divert waste from disposal; and
- Measuring and tracking greenhouse gas emissions associated with collecting and recycling residential WPP during Post-Transition Phase 2.

### **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 designate<sup>18</sup> must meet on a continuous basis in order to be eligible to receive payments under the WPP Stewardship Plan.

These policies and procedures are intended to support the continued growth of a safe, stable and sustainable residential 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 Payments for Municipal Residential WPP Services**

#### **4.4.1 Approach**

The WPP Stewardship Plan supports the following types of residential WPP collection services appropriate to Saskatchewan's demography and geography:

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

The organization eligible to receive payments under the WPP Stewardship Plan is either a municipality or a municipality's designate<sup>19</sup>. MMSW will make payments 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 payments must meet the following requirements:

- Provide WPP collection services to residents and recycle the collected WPP; and

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<sup>18</sup> 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).

<sup>19</sup> Another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality.

- Be in compliance with the collector and processor policies and procedures set out in Appendix B.

The manner in which payments are distributed is intended to:

- Support convenient, effective and efficient residential WPP collection and recycling services to manage WPP supplied by MMSW Members appropriate to Saskatchewan's demography and geography;
- Support residential collection of WPP supplied by MMSW Members using the collection system most appropriate to each area's demography and geography;
- Encourage diversion of residentially generated WPP supplied by MMSW Members from municipal landfills;
- Support entrepreneurial opportunities for municipalities and those that operate residential WPP programs on behalf of municipalities to manage WPP supplied by MMSW Members; and
- Reimburse municipalities for up to 75% of the net costs to operate efficient and effective programs to manage household WPP supplied by MMSW Members.

The WPP Stewardship Plan is for the collection and recycling of residential WPP supplied by MMSW Members. MMSW will not pay municipalities to collect or recycle:

- Materials that are not WPP as defined in the WPP Stewardship Plan;
- WPP from industrial, commercial or institutional (ICI) sources;
- WPP supplied by exempt and non-compliant stewards;
- WPP supplied by stewards that are part of an approved product management program for packaging and paper other than MMSW's WPP Stewardship Plan; or
- Packaging containers, such as oil, antifreeze and diesel exhaust fluid containers that are intended to be managed by other product management programs.

#### **4.4.2 Available Data**

In July 2012, MMSW commissioned a *Saskatchewan Datacall Analysis Report* (Datacall Report) to compile baseline information on the quantity 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.

Typically a number of years of experience, supported by local government staff training and rigorous verification protocols, 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 was 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 payment formula.

During the Transition Period and Post-Transition Phase 1, MMSW is 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.

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 Saskatchewan 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 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 were adjusted to remove commodity revenue that Manitoba programs receive for the containers likely to be returned for deposit by Saskatchewan residents. The adjusted program costs and municipal payment calculated as 75% of the program costs are set out in the following table.

**Table 4.1: Municipal Payments for Calculating Weighted Average Payment Rate**

Population Category	Estimated Program Costs	Municipal Payment per Tonne of WPP Supplied by MMSW Members that is Collected (75% of Estimated Program Cost)
> 100,000 <sup>20</sup>	\$124 per tonne	\$93 per tonne
15,000 to 100,000 <sup>21</sup>	\$207 per tonne	\$156 per tonne
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

The weighted average municipal payment, based on the tonnes expected to be collected in each Population Category and the Municipal Payment per Tonne from Table 4.1 is \$140 per tonne. The \$140 per tonne weighted average is calculated as follows:

- Total collected tonnes for each Population Category were based on
  - The projected collected tonnes reported by municipalities that signed Service Agreements with MMSW in 2014, and
  - An assumption of 50 kg per capita (125 kg per household) for those municipalities that signed Service Agreements with MMSW in 2014 but did not report collected tonnes
- Total municipal payment for each Population Category was calculated by
  - Multiplying total collected tonnes for each Population Category by the Municipal Payment per Tonne for that Population Category from Table 4.1
- Weighted average was calculated by
  - Adding total collected tonnes for all Population Categories
  - Adding total municipal payments for all Population Categories
  - Dividing those two numbers to yield the weighted average municipal payment per collected tonne

During the Transition Period and Post-Transition Phases 1 and 2, the quantity of collected WPP reported by municipalities registered with MMSW<sup>22</sup> will be adjusted using best available information to remove the quantity of materials that are outside the scope of:

- *The Household Packaging and Paper Stewardship Program Regulations* including:
  - WPP from ICI sources<sup>23</sup>,

<sup>20</sup> Regina and Saskatoon.

<sup>21</sup> Prince Albert, Moose Jaw, Yorkton and Swift Current.

<sup>22</sup> By executing a Service Agreement with MMSW.

- WPP, such as oil, antifreeze and diesel exhaust fluid containers, intended to be managed by other product management programs; and
- This WPP Stewardship Plan including:
  - Materials that are not WPP as defined in the WPP Stewardship Plan; and
  - WPP that was supplied by anyone that is not an MMSW Member.

#### 4.4.3 Transition Period

During the Transition Period, payments under the WPP Stewardship Plan will be made to municipalities, subject to their compliance with the collector and processor policies and procedures set out in Appendix B and execution of a Service Agreement with MMSW, to manage residential WPP supplied by MMSW Members. Only the portion of WPP collected by municipalities that was supplied by MMSW Members is eligible for payment from MMSW.

Over recent years, especially since *The Household Packaging and Paper Stewardship Program Regulations* were approved, municipalities have been introducing WPP recycling programs. It is recognized that municipalities without WPP recycling services may choose to do so prior to or during implementation of the WPP Stewardship Plan.

To accommodate these circumstances, MMSW will calculate payments to municipalities during the Transition Period using the methodology set out in Table 4.2.

**Table 4.2: Methodology to Calculate Municipal Payments**

Step	Objective	Methodology	Output
1	Determine the paper and packaging supplied by MMSW Members that is available for collection from households	=	Paper and packaging supplied by MMSW Members that is available for collection from households per year <sup>24</sup>
2	Determine the portion of paper and packaging supplied by MMSW Members that is collected from households by municipalities	Multiply the output of Step # 1 by 60% to represent the portion captured from households by municipalities <sup>25</sup>	Paper and packaging supplied by MMSW Members that is collected from households by municipalities
3	Determine the total amount available to SK municipalities	Multiply the output of Step # 2 (in tonnes) by the weighted average payment rate of \$140 per tonne	Total amount available to municipalities to manage paper and packaging supplied by MMSW Members that is collected from households

<sup>23</sup> Refer to Appendix C for the methodology to deduct ICI WPP.

<sup>24</sup> Calculated each year by November 30.

<sup>25</sup> The 60% capture rate will be reviewed periodically.

Step	Objective	Methodology	Output
4	Determine payment per household to manage paper and packaging supplied by MMSW Members that is collected from households	Divide the output of Step # 3 by the number of households in SK <sup>26</sup>	Payment per household available to municipalities
5	Determine payment per municipality registered with MMSW	Multiply the output of Step # 4 by the number of households served <sup>27</sup> in each municipality registered with MMSW	Payment per municipality (distributed to municipalities registered with MMSW in quarterly installments)

#### **4.4.4 Post-Transition Phase 1**

During Post-Transition Phase 1, payments under the WPP Stewardship Plan will be made to municipalities, subject to their compliance with the collector and processor policies and procedures set out in Appendix B and execution of a Service Agreement with MMSW, to manage residential WPP supplied by MMSW Members. Only the portion of WPP collected by municipalities that was supplied by MMSW Members is eligible for payment from MMSW.

MMSW will make payments to municipalities during Post-Transition Phase 1 using the methodology set out in Table 4.2, subject to reconsideration of the basis for payment<sup>28</sup> to apply lessons learned from the Transition Period.

#### **4.4.5 Post-Transition Phase 2**

During Post-Transition Phase 1, MMSW will implement a process to compile municipal cost data to adjust the payment formula to be utilized in Post-Transition Phase 2. To avoid imposing the administrative burden of an annual Datacall on all Saskatchewan municipalities registered with MMSW and to ensure that the data compiled are comprehensive and consistent, MMSW will use the services of accredited accountants to confirm tonnage data reported by municipalities registered with MMSW and compile data on municipal costs and revenues<sup>29</sup> for municipalities registered with MMSW including:

- The quantity of residential WPP collected and marketed by the municipality;
- Costs<sup>30</sup> incurred by the municipality to deliver residential WPP collection services and to process and market the collected residential WPP;

<sup>26</sup> Based on the most recent Statistics Canada census data.

<sup>27</sup> Households receiving WPP curbside or multi-family building collection service by a municipality or households without collection service but with access to a depot accepting WPP operated by a municipality. Refer to Appendix D.

<sup>28</sup> Options include but are not limited to payment per household served, per capita served or per tonne of WPP supplied by MMSW Members that was collected and is eligible for payment.

<sup>29</sup> 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.

<sup>30</sup> The eligible cost and revenue categories are set out in Appendix E.

- Revenue received by the municipality and/or by its processing contractor from commodity markets for the residential WPP; and
- Any other revenue received by the municipality associated with the residential WPP program.

Data will be compiled from a sufficient number of municipalities and regional waste authorities (RWA) that are registered with MMSW during Post-Transition Phase 1 to provide a reasonable sample of the municipalities in the categories used in the payment formula, taking into consideration the proportion of tonnes collected and costs incurred by the municipalities in the category.

The following table illustrates the proportionate number of regional waste authorities and municipalities that will be selected during Post-Transition Phase 1 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. The actual number sampled during Post-Transition Phase 1 will reflect municipalities and RWA that are registered with MMSW during Post-Transition Phase 1.

**Table 4.3: Data Compilation Sample Group**

<b>Population Categories</b>	<b>Number of RWA in Population Category</b>	<b>Estimated Number of RWA in Study Group</b>	<b>Number of Municipalities (Non-RWA) in Population Category<sup>31</sup></b>	<b>Estimated Number of Municipalities (Non-RWA) in Study Group</b>
>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

MMSW will use the data compiled by the accountants to:

- Inform the development of definitions of 'efficient' and 'effective' for purposes of paying up to 75% of a municipality's net costs to operate an efficient and effective program to manage residential WPP supplied by MMSW Members;
- Assess the efficiency and effectiveness of programs operated by municipalities registered with MMSW to collect and recycle residential WPP supplied by MMSW Members; and
- Adjust the payment formula to pay municipalities registered with MMSW operating efficient and effective programs up to, but not more than, 75% of their net costs to operate an efficient and effective program to manage residential WPP supplied by MMSW Members.

In adjusting the payment formula to be utilized in Post-Transition Phase 2, MMSW may:

<sup>31</sup> Based on Statistics Canada 2011 census data.

- Modify the structure of the payment formula to:
  - Reflect cost differences for the various types of residential WPP collection services;
  - Reflect cost differences to manage residential WPP supplied by MMSW Members;
  - Reflect municipal characteristics that affect the costs to deliver residential WPP collection services; and/or
  - Encourage program efficiency and effectiveness;
- Modify payment rates to pay for, on a go-forward basis, up to 75% of municipalities' net costs to operate efficient and effective programs to manage residential WPP supplied by MMSW Members;
- Modify payment rates to encourage increased diversion of residential WPP supplied by MMSW Members from landfill; and/or
- Modify payment rates to recover any over payment or top up any under payment to municipalities during Post-Transition Phase 1 should the payment formula 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, costs and revenues used as the basis for the payment formula in Post-Transition Phase 2 are routinely updated.

#### **4.4.6 Steward Financing**

MMSW Members enter into an agreement with MMSW that specifies the fees to be paid and how they are calculated in exchange for a performance covenant whereby MMSW assumes the Member's obligations under the WPP Regulations. The Membership Agreement (MA) states that fees are to be calculated on a fair basis and with a view to ensuring, so far as reasonably possible, that MMSW, in total, incurs neither a profit nor a loss while having sufficient resources to operate an efficient and effective WPP program.

The Membership Agreement sets out that the fees are to be computed by reference to the following elements:

- Material management costs:
  - The net cost to collect and recycle up to 75% of the Member's WPP (known as material management fees).
- Program management costs:
  - Costs to administer the PPP program.
- Other costs:
  - MMSW fees may include a contribution to reserves, contingencies and/or investments as necessary to operate MMSW in its Members' best interests and in accordance with commitments in the WPP Stewardship Plan. These reserves and investments may be material-specific (in the case of market development investments) or common to all materials (reserves for operating or wind-down).
  - A sum may be added to fees equivalent to the amount required to defray any losses that MMSW may have incurred in a prior year due to fee revenues being insufficient

to cover program costs. MMSW will also take into account in calculating the fees any surplus received by MMSW as a result of its operations.

- To simplify the administrative burden on smaller enterprises, MMSW may set a flat or graduated fee based on annual sales or material tonnage supplied into the marketplace.

MMSW will communicate with its Members 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 are Members of MMSW.

MMSW fees for the Transition Period are set out in the following table.

**Table 4.4: Steward Fees in Transition Period**

Category	Material	Fee Rates
<b>PRINTED PAPER</b>		
Printed Paper	Newsprint	7.15 ¢/kg
	Magazines and Catalogues	7.15 ¢/kg
	Telephone books	
	Other Printed Paper	
<b>PACKAGING</b>		
Paper Based Packaging	Corrugated Cardboard	12.92 ¢/kg
	Boxboard	
Composite Paper Packaging	Gable Top Cartons	22.47 ¢/kg
	Paper Laminates	
	Aseptic Laminates	
High Grade Plastics Packaging	PET Bottles	17.54 ¢/kg
	HDPE Bottles	
Low Grade Plastics Packaging	Plastic Film	24.62 ¢/kg
	Polystyrene	
	Other Plastics	
Plastic Laminates	Plastic Laminates	33.76 ¢/kg
Steel Packaging	Steel	15.76 ¢/kg
Aluminum Packaging	Aluminum Food & Milk Containers	24.32 ¢/kg
	Other Aluminum Packaging	

Category	Material	Fee Rates
Glass Packaging	Clear Glass	13.80 ¢/kg
	Coloured Glass	

In Post-Transition Phases 1 and 2, MMSW will reset fees based on the packaging and paper reported by its Members and its annual costs to implement this WPP Stewardship Plan.

Steward fees are calculated using a fee-setting methodology that is grounded in principles such as ensuring each material pays its fair share of costs and cross-subsidization between materials is avoided. The fee-setting methodology remains in use year-over-year without change unless a periodic review process, carried out in consultation with Members, results in recommendations to modify the methodology. While the data entered into the fee-setting methodology, such as the quantity of packaging and paper supplied by Members and MMSW's annual budget, do change each year, the method to allocate these costs across Members' reported packaging and paper as set out in the fee-setting methodology remains the same year-over-year. The fee-setting methodology is reflected in the Membership Agreement between MMSW and its Members.

#### **4.4.6 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.

A dispute between MMSW and a Member will follow a dispute resolution process that is referenced in the Membership Agreement and published on the MMSW website using a three-step dispute resolution process comprised of:

1. Documentation of the issue and discussion with MMSW management
2. Mediation - used if Step 1 is unsuccessful
3. Arbitration - used if Step 2 is unsuccessful

Should a municipality dispute the application of the payment formula, the following dispute resolution process will be used:

- Discussion with MMSW senior management
- Facilitation: to prevent escalation and to explore interests/remedies
- Mediation - used if facilitation is unsuccessful<sup>32</sup>
- Arbitration - used if mediation is unsuccessful<sup>33</sup>

<sup>32</sup> 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.

<sup>33</sup> 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.

## 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;
- 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 takes 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 and activities used to inform the public about the WPP Stewardship Plan, including any changes. For purposes of this WPP Stewardship Plan, 'public' includes three stakeholder groups:

- The business community (stewards and their industry associations)
- Saskatchewan municipalities
- Saskatchewan residents

### Business Community

In 2014, while preparing to launch its 2013 WPP Stewardship Plan, MMSW widely promoted its Plan and actively encouraged potentially obligated businesses to join its program using a variety of stakeholder engagement tools including:

- **Mass mailings** in early 2014 to those businesses whose profile suggested they may meet the criteria of an obligated producer (national and Saskatchewan-based) and associated industry associations. Each of the three mailings reached over 1,600 potentially obligated businesses and provided guidance to businesses on their regulatory obligations and the steps they needed to take to join MMSW's program.
- **Educational webinars** in the first half of 2014 generated significant awareness of the MMSW program within Saskatchewan's business community:
  - March 2014: Overview of the Regulation, MMSW's WPP Stewardship Plan and proposed Small Business Policy
  - March 2014: New Reporting Tools and Tips

- May 2014: Review of MMSW's Membership Agreement
- June 2014: Guidance on How to Prepare and Submit Your Steward Report
- October 2014: MMSW's first budget and fee schedule presented to Stewards
- **Newsletter updates to MMSW Members and industry associations:** In 2014, MMSW sent 26 discrete communiques to MMSW Members and industry associations.
- **MMSW website:** The website provides a useful resource for stewards looking for guidance on how to participate in the program. It offers a variety of tools ranging from guidebooks on how to use and navigate the reporting portal to the instructional webinars on how to prepare material reports. The latest news and information concerning the program is posted on the website, providing a single hub for information about the MMSW program.
- **Steward services call centre support:** The steward services team addressed approximately 1,500 steward interactions in 2014 answering questions and providing guidance on how to join MMSW's program and prepare steward reports. A single interaction can include numerous exchanges (via emails and/or telephone calls) with a steward.
- **Individual stakeholder meetings:** Throughout 2014, MMSW met with various steward groups such as Newspapers Canada and the Canadian Federation of Independent Business (CFIB) at their request to discuss MMSW's proposed Small Business Policy and other components of the 2013 WPP Stewardship Plan.

In addition to these steward outreach activities in 2014, MMSW, as a matter of routine operations, communicates with Members on the following topics:

- Membership Agreement
  - The Agreement sets out the respective roles and obligations of MMSW and the steward Member. MMSW regularly communicates with Members concerning the Agreement, and any revisions if proposed, using webinars and communiqués.
- Steward reporting
  - Members are required to annually report the quantities of packaging and paper supplied to Saskatchewan residents. Webinars are held annually in advance of the reporting period to orient Members to the reporting requirements and review reporting best practices. Members are provided multiple notices of upcoming webinars. The notices are posted to the MMSW website where webinar content is also posted. Members receive links to the full content of each webinar as well as the Q&A document from each webinar.
- Steward fees
  - MMSW communicates the annual fees to be paid by material and the quarterly schedule for making payments to Members. Fees for the following year are presented to Members in the prior quarter at the annual steward meeting that can be attended in person or via webinar. In advance of this meeting, a document is distributed to all Members and is made available on the MMSW website, outlining the MMSW's program performance in the prior year, the status of current year performance, a projection of next year's performance to which fees are tied and the next year's fee schedule. Explanations for changes in budgets and fees are

provided. Attendees are invited to ask questions at the meeting, with answers provided during the meeting and posted on the MMSW website. Communiques are issued both before and after the meeting.

- General program updates
  - Members are also provided with general updates through periodic electronic newsletters.

MMSW will, as a matter of routine operations, provide the same communication opportunities as outlined above to Registrants (once these businesses have registered and paid their fee).

### **Saskatchewan Municipalities**

In 2014, while preparing to launch its 2013 WPP Stewardship Plan, MMSW engaged frequently with municipal stakeholders using a variety of mechanisms including:

- **Webinars** to ensure municipalities were informed about the payment model and the steps municipalities needed to take to register with MMSW:
  - May 2014: Overview of the payment model, reporting frequency and process to appoint a municipal delegate
  - May 2014: Overview of the Service Agreement
  - December 2014: Overview on preparing and submitting municipal reports (webinars were held on December 2, 3, and 4, 2014)
- **Communiques to municipalities and municipal associations:** In 2014, a total of 11 communiques were distributed providing information about how to register with MMSW, how MMSW payments would be calculated, components of the Service Agreement and guidance on how to submit reports.
- **Collector support services:** MMSW's supply chain team regularly fielded calls and emails from municipalities and their subcontractors and designates to respond to their questions and provide information on the 2013 WPP Stewardship Plan and MMSW's Service Agreement.
- **Website:** MMSW's website provides a dedicated section for collectors (municipalities, First Nations, designates, etc.) containing resources and information on how to participate in the program. The website includes archived webinars and guidebooks on how to navigate the reporting portal. The latest news and information concerning the program is posted on the website, providing a single hub for information about the MMSW program.

MMSW will continue to communicate directly with municipalities that enter into Service Agreements with MMSW as a matter of routine operations. MMSW will also continue to communicate with municipalities through SUMA, SARM and ARWMAS.

## **Saskatchewan Residents**

MMSW will periodically conduct research to better understand the views and behaviours of Saskatchewan residents regarding recycling and their level of recycling participation. The research provides insights into residents' existing and preferred sources of recycling information, perceived barriers to recycling and misunderstandings about recycling (including, for example, confusion on what can and cannot be recycled). These insights are used to inform promotion and education (P&E) programs. Initial consumer research was conducted in Saskatchewan in early 2014 to establish a baseline against which future resident awareness can be gauged.

Municipalities that sign Service Agreements with MMSW are responsible for resident P&E activities because municipalities deliver collection and recycling services and are therefore in the best position to understand and address their residents' information needs. MMSW's payments to municipalities take into consideration the cost of municipal P&E activities.

In addition, MMSW will support municipalities to achieve more consistency in P&E activities and messages by:

- Developing templates into which municipalities can add their logo and contact information for use by municipalities to inform residents about the types of materials that are accepted in the collection system; and
- Developing advertising templates and information posters that focus on particular materials for use by municipalities to encourage more recycling by residents.

The templates will be available to municipalities that register with MMSW to educate and engage their residents and encourage increased recycling behaviour.

MMSW will also develop and maintain a resident section on the MMSW website to provide information on the WPP Stewardship Plan and to describe the relationship between MMSW and municipalities

## **4.6 Measurement**

Section 10 of the Regulations requires that MMSW submit an annual report by July 31 of each year describing activities related to the WPP Stewardship Plan during the period commencing April 1 in the previous year and ending March 31 of the year in which the report is due.

The following sections describe the process to compile the information to be included in MMSW's annual report.

In addition to the information described in the following sections, the annual report will include the fees charged to stewards and the audited financial statements for the period commencing January 1 of the previous year and ending December 31 of the previous year. The audited financial statements will set out the total amount of fees collected from Members (and, during

the Transition Period, Registrants) and the amount spent to operate and administer the program including the amount spent on communications.

Appendix F provides a table listing the requirements of Section 10 of the Regulations and the relevant reference in the WPP Stewardship Plan.

#### **4.6.1 Collection and Recycling of Waste Packaging and Paper**

During implementation of the WPP Stewardship Plan, MMSW will compile data<sup>34</sup> from Members and municipalities or municipalities' designates<sup>35</sup> registered with MMSW in order to include the following information in its annual report to the Minister of Environment:

- Total tonnes of packaging and paper supplied by MMSW Members;
- Total tonnes of WPP collected by municipalities registered with MMSW;
- Tonnes and kilograms per capita of WPP collected by each participating municipality or its designate;
- Tonnes and kilograms per capita of WPP recycled<sup>36</sup> by each participating municipality or its designate;
- Total tonnes of WPP recycled<sup>37</sup> and therefore diverted from municipal landfills by municipalities registered with MMSW; and
- The recovery rate for each category of WPP reported by municipalities registered with MMSW as a percentage of the total of that category of packaging and paper supplied by MMSW Members;
- The recovery rate of total WPP diverted by municipalities registered with MMSW as a percentage of total packaging and paper supplied by MMSW Members; and
- The amount of revenue received by municipalities registered with MMSW from the sale of WPP.

Because MMSW cannot be certain that the entire universe of obligated stewards will register with its program and because not all municipalities may choose to participate in its program, MMSW cannot commit to reporting a provincial recovery rate that is predicated on universal participation by all obligated businesses and all municipalities with WPP recycling programs.

MMSW will provide a recovery rate expressed as follows:

$$\text{Recycling Rate \%} = \frac{\text{Tonnes Diverted by Municipalities Registered with MMSW}}{\text{Tonnes Supplied by MMSW Members}} \times 100$$

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<sup>34</sup> Adjusted to remove the quantity of materials that are outside the scope of *The Household Packaging and Paper Stewardship Program Regulations* and this WPP Stewardship Plan as described in Section 4.4.2.

<sup>35</sup> Municipal reporting requirements are set out in Appendix B General Policies and Procedures for Collectors and Processors.

<sup>36</sup> The quantity recycled will be based on data reported by municipalities which reflect shipments to recycling end markets.

<sup>37</sup> See previous footnote.

However, the tonnes reported as collected and recycled by municipalities registered with MMSW will include packaging and paper supplied into those municipalities regardless of whether the supplying business is exempt or obligated under the Regulations and, if obligated, whether the supplying business is compliant or non-compliant.

Municipalities (and/or municipalities' designates) registered with MMSW 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 WPP Stewardship Plan.

#### **4.6.2 Greenhouse Gas Emissions**

During Post-Transition Phase 1, MMSW will undertake the necessary research and develop a data tracking and modelling system for greenhouse gas emissions (GHG) associated with residential WPP collection and recycling by municipalities registered with MMSW. Following development of the model, MMSW may modify its agreements with municipalities to include data reporting, if necessary. MMSW will begin to compile GHG data from municipalities registered with MMSW during Post-Transition Phase 2 of the WPP Stewardship Plan with the full data tracking system functional within two years of that date.

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

#### **4.6.3 Other Measurements**

WPP program effectiveness and participation rates will be assessed by measuring the quantity of WPP collected per capita in the municipalities registered with MMSW.

WPP program convenience and municipal accessibility and fairness will be assessed by measuring the proportion of Saskatchewan municipalities that participate in the WPP Stewardship Plan and the proportion of Saskatchewan residents these municipalities service.

The WPP Stewardship Plan efficiency and sustainability will be assessed through the periodic audits described in Section 4.4.5.

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

Activities to prepare for the launch of the WPP Stewardship Plan include:

- Building data management systems to accommodate steward reporting;
- Implementing the first steward reporting process including data verification;
- Using data from the first steward reporting process, allocating program costs by material category and setting steward fees;
- Building data management systems to accommodate local government reporting; and
- Executing Service Agreements with municipalities and First Nations.

This revised WPP Stewardship Plan replaces MMSW's Stewardship Plan dated December 12, 2013 which was approved by the Minister on December 20, 2013, enabling a January 1, 2015 program launch (which was deferred). This revised WPP Stewardship Plan is predicated on approval by the Minister on or before October 16, 2015 to enable a January 1, 2016 program launch.

Municipalities that have executed a Service Agreement with MMSW prior to the launch date will be eligible for payments starting on the launch date. A municipality that executes a Service Agreement with MMSW after the launch date will be eligible for payments starting on the first day of the month following the Service Agreement execution date.

## 4.8 Consultation

MMSW used a combination of mechanisms to consult with stakeholders during development of the WPP Stewardship Plan.

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.

During development of the WPP Stewardship Plan, 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 WPP Stewardship Plan prior to posting the WPP Stewardship Plan for consultation. MMSW also provided the working group with an opportunity to review and comment on a draft final version of the WPP Stewardship Plan prior to submission to the Minister of the Environment.

A draft WPP Stewardship Plan 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 WPP Stewardship Plan following the workshop. Appendix H provides the submissions received, MMSW's responses to address the points raised and, where applicable, a description of revisions in the 2013 WPP Stewardship Plan.

Following the Minister's December 18 announcement, MMSW consulted with representatives of SUMA, SARM and ARWMAS and stewards on WPP Stewardship Plan revisions and posted a draft revised WPP Stewardship Plan for consultation. Appendix G provides the submissions received, MMSW's responses to address the points raised and, where applicable, a description of revisions in this revised WPP Stewardship Plan.

MMSW continues 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 payment 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><b>Brand</b></p> <p>Means a trademark.</p>
<p><b>Brand Owner</b></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"><li>(a) A person Resident in Saskatchewan who is the holder of the registered trademark, or</li><li>(b) A person Resident in Saskatchewan who is the licensee, in respect of the registered trademark, or</li><li>(c) A person Resident in Saskatchewan, who is the licensee, in respect of the intellectual property rights of the unregistered trademark.</li></ul> <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><b>Depot Collection Services</b></p> <p>Collection of WPP through:</p> <ul style="list-style-type: none"><li>• Operation of a permanent facility at a fixed location that is open on a regular schedule to receive household WPP delivered by residents; or</li><li>• 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.</li></ul>
<p><b>First Importer</b></p> <p>Means a person Resident in Saskatchewan, who imports into Saskatchewan:</p> <ul style="list-style-type: none"><li>(a) a specific paper which is obligated, for which a Brand Owner does not exist, or</li><li>(b) a specific good, the packaging of which is obligated, for which a Brand Owner does not exist;</li><li>(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.</li></ul>
<p><b>ICI</b></p> <p>Industrial, commercial and institutional.</p>
<p><b>Household Collection Services</b></p> <p>Collection of WPP:</p> <ul style="list-style-type: none"><li>• Where single-family or multi-family households set WPP at the curb for collection by the</li></ul>

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 by municipalities registered with MMSW and the denominator representing the quantity of WPP supplied by MMSW Members.

$$\text{Recycling Rate \%} = \frac{\text{Tonnes Diverted by Municipalities Registered with MMSW}}{\text{Tonnes Supplied by MMSW Members}} \times 100$$

## Appendix B – Collector and Processor Policies and Procedures

### General Policies and Procedures for Collectors and Processors

A municipality receiving payments under the WPP Stewardship Plan or a municipality's designate<sup>38</sup> receiving payments under the WPP Stewardship Plan on behalf of a municipality shall report<sup>39</sup> to MMSW:

- The following information annually during the Transition Period and Post-Transition Phases 1 and 2:
  - 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<sup>40</sup>;
  - 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 quarterly during the Transition Period and Post-Transition Phases 1 and 2:
  - Tonnes<sup>41</sup> of residential WPP collected from curbside and multi-family buildings and tonnes<sup>42</sup> of residential WPP received from residents at depots by stream for each collection service area;
  - The number of ICI stops on curbside and multi-family building collection routes;
  - Tonnes<sup>43</sup> of residential WPP shipped to recycling end-markets by type of packaging and type of paper and by recycling end-market<sup>44</sup>; and
  - Tonnes<sup>45</sup> of residential WPP rejected by recycling end-markets including the reason for the rejection.
  - Amount of revenue received for the residential WPP shipped to recycling end-markets by type of packaging and type of paper.

A municipality receiving payments under the WPP Stewardship Plan or a municipality's designate<sup>28</sup> receiving payments under the WPP Stewardship Plan on behalf of a municipality shall deliver WPP services in a manner that utilizes persons, bodies or other entities that

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<sup>38</sup> A municipality's designate is another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality

<sup>39</sup> All information reported by a municipality is subject to review by MMSW's accountant (in addition to the information described in Section 4.4.5) if the municipality is selected as a representative municipality for the municipal group of which it is part.

<sup>40</sup> Access to depot collection services is based on defined drive distances for urban and for rural residents.

<sup>41</sup> Based on weigh scale tickets. Estimates and projections are not acceptable.

<sup>42</sup> Based on weigh scale tickets. Estimates and projections are not acceptable.

<sup>43</sup> Based on weigh scale tickets. Estimates and projections are not acceptable.

<sup>44</sup> Recycling end-market information will be considered confidential.

<sup>45</sup> Based on weigh scale tickets. Estimates and projections are not acceptable.

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 staff or residents.

### **Policies and Procedures for Household Collection Services**

A municipality or a municipality's designate<sup>46</sup> shall ensure that:

- Waste packaging and paper (WPP) is collected from residents.
- WPP collected from residents comprising
  - Packaging as defined in Clause 2(1)(e) of *The Household Packaging and Paper Stewardship Program Regulations* supplied by MMSW Members; and
  - Paper as defined in Clause 2(1)(f) of *The Household Packaging and Paper Stewardship Program Regulations* supplied by MMSW Members.
- 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.

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<sup>46</sup> 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 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 designate<sup>47</sup> 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* supplied by MMSW Members; and
  - Paper as defined in Clause 2(1)(f) of *The Household Packaging and Paper Stewardship Program Regulations* supplied by MMSW Members.
- 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 program<sup>48</sup>.
- 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.

<sup>47</sup> A municipality's designate is another person that operates a residential waste diversion program for waste packaging and paper on behalf of a municipality

<sup>48</sup> Quantities of WPP collected at depots will be monitored to identify atypical capture rates and, if identified, the amounts considered to be from sources other than MMSW Members will be deducted prior to calculating payments due.

- WPP depot collection services are delivered in a manner that contributes to a positive view of WPP recycling and encourages continued participation by residents. Depots:
  - Are maintained in a satisfactory condition and have appropriate safety signage in accordance with current statutes, rules and regulations.
  - 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 designate<sup>49</sup> 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-markets 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

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<sup>49</sup> 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 maintained in a satisfactory condition and have appropriate safety signage in accordance with current statutes, rules and regulations.
- 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 – Removing ICI WPP

Where WPP from 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 calculate ICI locations as a percentage of total locations on the collection route and use the percentage to deduct the kilograms from ICI locations in order to calculate the kilograms of WPP assumed to be residentially generated WPP prior to calculating the payments 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 sources<sup>50</sup>. 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:
  - 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.

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<sup>50</sup> 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.

## Appendix D – Households Served

Households served by municipal collection service are:

- Self-contained dwelling units providing accommodation to one or more people, in single-family dwellings and in buildings with up to four self-contained dwelling units, where the resident is expected to deliver WPP to the curb for collection by a municipality (referred to as `Curbside Households`); and
- Self-contained dwelling units providing accommodation to one or more people in buildings with five or more self-contained dwelling units where the resident is expected to deliver WPP to a central location within a multi-family building<sup>51</sup> from which the WPP is collected by a municipality (referred to as `Multi-Family Households`).

Curbside Households and Multi-Family Households may also have access to a depot, but remain, for purposes of households served, Curbside Households and Multi-Family Households, respectively.

Households that are neither Curbside Households nor Multi-Family Households and that have access to a drop-off depot operated by a municipality are referred to as `Depot Only Households`. A Depot Only Household is deemed to have access to a depot if the household is within a 45 minute drive of the depot.

In determining the number of Depot Only Households, the following conditions apply:

- Where a Depot Only Household is located within the specified drive time of more than one Depot operated by the same municipality, the Depot Only Household is counted as one (1).
- Where a Depot Only Household is located within the specified drive time of more than one Depot operated by different municipalities, the Depot Only Household is counted as one (1) only for the municipality to which the Depot Only Household pays property taxes.
- Where a Depot Only Household is located within the specified drive time of a depot but does not pay property taxes to the municipality operating the depot, the municipality operating the depot must provide evidence of a service arrangement with the municipality to which the Depot Only Household pays property taxes and the latter municipality must waive its right to claim the household as a Depot Only Household before the Depot Only Household will be counted as one (1) for the municipality operating the depot.
- Where a municipality restricts depot access to identified households, only the identified households that fall within the specified drive time will be counted as Depot Only Households for the depot.

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<sup>51</sup> A complex where residents are expected to deliver WPP to a central storage area accessible by all residents from which WPP collection occurs.

## **Appendix E – Definition of Municipal Costs and Revenues<sup>52</sup>**

### **WPP Curbside Collection Service**

The types of costs to be considered include:

- Where the WPP collection service is contracted, payments to contractors for services consistent with the policies and procedures for collectors and processors;
- The amortized cost<sup>53</sup> 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 cost<sup>54</sup> 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 supervisors<sup>55</sup>
    - 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 for services consistent with the policies and procedures for collectors and processors;
- The amortized cost<sup>56</sup> 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 cost<sup>57</sup> 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 supervisors<sup>58</sup>

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<sup>52</sup> This definition will inform the compilation of data on municipal costs and revenues by accredited accountants as described in Section 4.4.5.

<sup>53</sup> Straight line amortization over 10 years.

<sup>54</sup> Straight line amortization over 7 years.

<sup>55</sup> Staff that are routinely required to wear safety equipment to complete their duties.

<sup>56</sup> Straight line amortization over 10 years.

<sup>57</sup> Straight line amortization over 7 years.

- 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 Depot Collection Service**

The types of costs to be considered include:

- Where the WPP collection service is contracted, payments to contractors for services consistent with the policies and procedures for collectors and processors;
- The amortized cost<sup>59</sup> 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 cost<sup>60</sup> 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 supervisors<sup>61</sup>
    - 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, processing<sup>62</sup> and/or marketing services are contracted, payments to contractors for services consistent with the policies and procedures for collectors and processors;

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<sup>58</sup> Staff that are routinely required to wear safety equipment to complete their duties.

<sup>59</sup> Straight line amortization over 10 years.

<sup>60</sup> Straight line amortization over 10 years.

<sup>61</sup> Staff that are routinely required to wear safety equipment to complete their duties.

<sup>62</sup> Processing includes sorting, quality control and preparation for shipment to recycling end-markets.

- 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 costs<sup>63</sup>;
  - 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 cost<sup>64</sup> 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 supervisors<sup>65</sup>
    - 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 cost<sup>66</sup> 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 supervisors<sup>67</sup>
  - 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)

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<sup>63</sup> Straight line amortization over 20 years.

<sup>64</sup> Straight line amortization over 10 years.

<sup>65</sup> Staff that are routinely required to wear safety equipment to complete their duties.

<sup>66</sup> Straight line amortization over 10 years.

<sup>67</sup> Staff that are routinely required to wear safety equipment to complete their duties.

### **Service Administration**<sup>68</sup>

The types of costs to be considered include salary, overhead and payroll burden associated with management staff<sup>69</sup> 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;
- Government or other grants provided to offset capital or operating costs for WPP programs; and
- Other (please specify).

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<sup>68</sup> 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.

<sup>69</sup> Staff that are not routinely required to wear safety equipment to complete their duties.

## Appendix F – Annual Report Requirements

Reporting Requirements as set out in Section 10(1) of the Regulations	Reference in WPP Stewardship Plan
<p>(a) the types and amount of</p> <p style="padding-left: 40px;">(i) residentially generated waste packaging and paper supplied for use in Saskatchewan; and</p> <p style="padding-left: 40px;">(ii) waste packaging and paper collected;</p>	<p>Section 4.6.1: “Total tonnes of packaging and paper supplied by MMSW Members”</p> <p>Section 4.6.1: “Total tonnes of WPP collected by municipalities registered with MMSW”</p>
<p>(b) the amount of waste packaging and paper collected under the program showing:</p> <p style="padding-left: 40px;">(i) the total amount of residentially generated waste packaging and paper diverted from municipal landfills;</p> <p style="padding-left: 40px;">(ii) the recovery rate of diverted waste packaging and paper expressed as a percentage of the total waste packaging and paper that is generated in Saskatchewan; and</p> <p style="padding-left: 40px;">(iii) for each category of waste packaging and paper:</p> <p style="padding-left: 80px;">(A) the total amount diverted from municipal landfills; and</p> <p style="padding-left: 80px;">(B) the recovery rate of diverted waste packaging and paper expressed as a percentage of the total waste packaging and paper for that category that is generated in Saskatchewan;</p>	<p>Section 4.6.1: “Total tonnes of WPP recycled<sup>70</sup> and therefore diverted from municipal landfills by municipalities registered with MMSW”</p> <p>Section 4.6.1: “The recovery rate of total WPP diverted by municipalities registered with MMSW as a percentage of total packaging and paper supplied by MMSW Members”</p> <p>Section 4.6.1: “Total tonnes of WPP recycled<sup>71</sup> and therefore diverted from municipal landfills by municipalities registered with MMSW”</p> <p>Section 4.6.1: “The recovery rate for each category of WPP reported by municipalities registered with MMSW as a percentage of the total of that category of packaging and paper supplied by MMSW Members”</p>
<p>(c) the fees charged to stewards and non-resident brand owners participating in the product management program by category of waste packaging and paper, including an</p>	<p>Section 4.6: “the annual report will include the fees charged to stewards”</p>

<sup>70</sup> The quantity recycled will be based on data reported by municipalities which reflect shipments to recycling end markets. .

<sup>71</sup> See previous footnote.

<p align="center"><b>Reporting Requirements as set out in Section 10(1) of the Regulations</b></p>	<p align="center"><b>Reference in WPP Stewardship Plan</b></p>
<p>explanation of any significant changes to those fees;</p>	
<p>(d) the total amount of fees collected from stewards and non-resident brand owners who are participating in the product management program to fund the program;</p>	<p>Section 4.6: “the annual report will include ... the audited financial statements for the period commencing January 1 of the previous year and ending December 31 of the previous year. The audited financial statements will set out the total amount of fees collected from Members (and, during the Transition Period, Registrants)...”</p>
<p>(e) the amount spent to operate the program in Saskatchewan;</p>	<p>Section 4.6: “the annual report will include ... the audited financial statements for the period commencing January 1 of the previous year and ending December 31 of the previous year. The audited financial statements will set out ... the amount spent to operate ... the program.”</p>
<p>(f) the costs incurred to administer the program;</p>	<p>Section 4.6: “the annual report will include ... the audited financial statements for the period commencing January 1 of the previous year and ending December 31 of the previous year. The audited financial statements will set out ... the amount spent to ... administer the program.”</p>
<p>(g) the amount spent on public education or public awareness and communication</p>	<p>Section 4.6: “the annual report will include ... the audited financial statements for the period commencing January 1 of the previous year and ending December 31 of the previous year. The audited financial statements will set out ... the amount spent on communications.”</p>

## Appendix G – Consultation Comments on 2015 Plan and Responses

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
Local Government	<p>The Town Council of Churchbridge has reviewed your proposed stewardship plan and has noted a couple of concerns with the proposed plan.</p> <p>1. Adjustments have been made in the past for non-compliance or non-participation (25%) but when looking at the new formula no adjustment has been made for the households that are not complying or participating. Using the 2011 census number for households is not accurate if all the households are not participating.</p> <p>2. The reporting requirements of materials collected, accepted and refused seem to becoming more extensive with each new plan but the actual payment has gone from “per MT” to “per Household” so why do the municipalities have to report all the details on tonnage. Much of that information may not even be available to us if the materials are being delivered to SARCAN in bulk.</p>	<p>1. Given the Minister’s announcement in December 2014 permanently exempting any business that generates less than \$2 million in gross annual revenue, or generates less than one tonne of household packaging and paper annually or operates a single retail store and exempting for two years all newspapers with annual revenue over \$2 million and all other businesses with annual revenue between \$2 million and \$5 million, the payment formula in the revised WPP Stewardship Plan is based on the quantity of packaging and paper supplied by MMSW Members (since MMSW will not know the quantity of packaging and paper supplied by exempt businesses) with an adjustment to represent the portion that is actually captured in municipal collection programs – assumed to be 60% of Waste Packaging and Paper (WPP) available for collection. The 60% capture rate takes into account households that do not set out any WPP for collection as well as those households that set out only a portion of the WPP generated in the household. As MMSW Members supply across the province, the formula calculates a payment per household. The payment due to a specific municipality, such as the Town of Churchbridge, is calculated using the number of households served by your WPP collection system.</p> <p>2. Municipal reporting requirements in the revised WPP Stewardship Plan remain unchanged from the 2013 Plan with the exception of reporting the number of households served by the municipality’s WPP collection system to allow calculation of the payment due. The municipal reporting requirements are a reflection of the reporting requirements set out in the <i>The Household Packaging and Paper Stewardship Program Regulations</i> as MMSW requires the information from municipalities in order to prepare its annual report to the Minister. Municipalities can assign a reporting delegate under the Service Agreement with MMSW.</p>	Revisions Reflected in 2015 WPP Stewardship Plan
Local Government	<p>The Town of Saltcoats is committed to ensuring that a sustainable and efficient recycling program is in effect in our community. It has been a year since the Town of Saltcoats moved to a curb-side recycling program in the fall of 2014. This decision was made based on the understanding that funding would be forthcoming in January 2015 to assist with the costs of our new recycling program. Council is concerned with the continued delays in implementing the program and with what appears to be a significant change in the amount of funding we will be eligible to receive.</p> <p>In addition, a decision to participate in the new program will need to be delayed until we have received actual numbers on the funding available. Currently, we have not been able to accurately calculate the</p>	<p>Given the Minister’s announcement in December 2014 permanently exempting any business that generates less than \$2 million in gross annual revenue, or generates less than one tonne of household packaging and paper annually or operates a single retail store and exempting for two years all newspapers with annual revenue over \$2 million and all other businesses with annual revenue between \$2 million and \$5 million, the payment formula in the revised WPP Stewardship Plan is based on the quantity of packaging and paper supplied by MMSW Members (since MMSW will not know the quantity of packaging and paper supplied by exempt businesses) with an adjustment to represent the</p>	Revisions Reflected in 2015 WPP Stewardship Plan

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>amount of funding available. This information once received will influence the decision regarding our future program and what fees will be required to continue the program as it was implemented last fall.</p> <p>Council continues to have concerns regarding the reporting requirements and the ability of our current service provider to completely comply with these requirements. This may also impact on Council's decision to participate in the revised MHSW Program.</p>	<p>portion that is actually captured in municipal collection programs – assumed to be 60% of WPP available for collection. As the quantity of packaging and paper supplied by MMSW Members is used in the payment formula, MMSW cannot calculate the payment available until all Members have reported and the data verification process has been completed. Assuming that the revised WPP Stewardship Plan is approved by the Minister by mid-October, MMSW has committed to calculating the payment rate per household for 2016 by November 30, 2015. Municipalities that have executed a Service Agreement with MMSW prior to the launch date will be eligible for payments starting on the launch date. A municipality that executes a Service Agreement with MMSW after the launch date will be eligible for payments starting on the first day of the month following the Service Agreement execution date.</p> <p>Municipal reporting requirements in the revised WPP Stewardship Plan remain unchanged from the 2013 Plan with the exception of reporting the number of households served by the municipality's WPP collection system to allow calculation of the payment due. The municipal reporting requirements are a reflection of the reporting requirements set out in the <i>The Household Packaging and Paper Stewardship Program Regulations</i> as MMSW requires the information from municipalities in order to prepare its annual report to the Minister.</p>	
Local Government	<p>Generally, the City of Saskatoon sees some key advantages in the new plan. Namely:</p> <ul style="list-style-type: none"> <li>• The level of funding appears to be stable and predictable;</li> <li>• The funding formula will be reviewed in a timely manner (i.e. after two years);</li> <li>• The commitment to working toward full compliance and increasing recycling rates; and</li> <li>• The revised plan can be implemented by January 1, 2016.</li> </ul> <p>However, despite these advantages, the City of Saskatoon does have some concerns about this revised plan. Specifically:</p> <ul style="list-style-type: none"> <li>• The new \$140 per tonne figure does mean less money for Saskatoon in the first two years of the program. Providing funding on a per capita basis delivers some certainty to a program where so much uncertainty has existed in the past. As such, we would strongly encourage continuing the use of per capita-based funding formulas for a period longer than two years.</li> <li>• Given the difficult in launching the MMRP, greater certainty for a longer period of time will be important to the sustainability of services in Saskatoon (and other communities).</li> <li>• The Program Plan does not provide much clarity on how funding levels may be affected by MMSW in evaluating the efficiency and effectiveness of various programs.</li> </ul>	<p>Step 4 of the payment formula set out in Table 4.2 yields a payment per household (not a payment per capita). The method of calculating the total amount available as payments to municipalities will be utilized for the Transition Period and Post-Transition Phase 1. The basis for distribution of the payments will be reviewed after two years to consider options such as payment per household served, per capita served or per tonne of WPP supplied by MMSW Members that was collected and is eligible for payment.</p> <p>The WPP Stewardship Plan does not describe how the payment formula will operate in Post-Transition Phase 2 to avoid pre-empting the work of the Advisory Committee in developing recommendations on the definitions of efficiency and effectiveness and how these definitions can be incorporated into the payment formula.</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
Local Government Association	<p>SUMA, SARM and ARWMAS appreciate the challenges posed by the provincial announcement in December 2014, as you appreciate the challenges faced by municipalities after the funding agreements were cancelled. Many communities began or expanded recycling programs according to the original MMRP funding formula, and it is disappointing that funding levels will be reduced under the revised Waste Packaging and Paper Stewardship Plan. The costs posed by delays and changes are real and being borne by municipalities.</p> <p>We understand from our consultations, the revised plan, and <i>The Household Packaging and Paper Stewardship Program Regulations</i>, MMSW is committed to the following:</p> <ol style="list-style-type: none"> <li>1. The Advisory Committee will begin immediately after the MMRP launch. Continuing our collaboration will be vital to ensuring the long-term success of this program. The Advisory Committee, a key component of the program plan and the regulations, will be fundamental to achieve this collaboration.</li> <li>2. MMSW will help ensure full compliance and improve collection rates. MMSW has committed on an ongoing basis to help ensure full compliance, including working with the Ministry of the Environment to identify, contact, and recruit obligated stewards, effectively communicate with stakeholders, and improve collection rates by collecting and sharing data and reporting numbers and public education.</li> <li>3. The methodology will be reviewed two years after launch. MMSW has promised that the methodology is subject to reconsideration of the basis of payment to apply lessons from the transition period. This is necessary to ensure the MMRP is providing adequate support to municipalities.</li> </ol> <p>We also suggest the following to address concerns:</p> <ol style="list-style-type: none"> <li>1. Careful calculation of the total paper and packaging supplied by MMSW members to households into Saskatchewan In October 2014, MMSW estimated that businesses registered with MMSW reported supplying 50,000 tonnes of waste packaging and paper into Saskatchewan. While this number may be affected by the provincial announcement, it is fundamental to the revised plan calculation, and should be updated as compliance levels increase.</li> <li>2. Striking the Advisory Committee and holding the first meeting within three months of the January 1, 2016 program launch The advisory committee will perform many important services for the program including identifying issues, the vetting of all program changes, making recommendations, and participating in the funding methodology review. We need this work to begin immediately.</li> </ol> <p>Given our understanding of MMSW's commitments and in anticipation of our concerns being addressed, we are prepared to support the revised plan as the opportunity to launch the MMRP in a timely basis given the provincial announcement.</p>	<p>Regarding calculation of the total paper and packaging supplied by MMSW Members to households in Saskatchewan, MMSW is working diligently to identify obligated businesses and to ensure that the quantity of packaging and paper supplied as reported by these businesses is accurate. Under the revised WPP Stewardship Plan, MMSW has committed reporting on the quantity of packaging and paper supplied by its Members no later than November 30.</p> <p>Regarding the Advisory Committee, MMSW will work diligently to hold the first meeting of the Advisory Committee within three months of the program launch.</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
Steward	<p>Saputo Dairy Products Canada : MMSW, as well as all CSSA organization, is a non-for-profit agency that discharges stewards' obligations for packaging and paper. For our company this should include all milk packaging and all other materials that enter municipal waste stream in province of Saskatchewan. However, we are aware of the fact that SARCAN also picks up and recycles the packaging in Saskatchewan. How do you plan to work with Sarcana? Can we make sure that our packaging is recycled fully?</p> <p>As you are aware, in Saskatchewan, SARCANA acts as a mechanism/service that recycles liquid plastic containers for the dairy industry. How will the total tonnage of these plastic containers be excluded from MMSW's blue box system?</p>	<p>Packaging for milk products is included in <i>The Household Packaging and Paper Stewardship Program Regulations</i> and is therefore part of MMSW's WPP Stewardship Plan. Dairy companies that join MMSW are required to report and pay stewardship fees on the packaging and paper they supply into the Saskatchewan residential market.</p> <p>Many municipalities accept milk packaging in their WPP collection systems.</p> <p>MMSW is aware that SARCANA has been collecting milk packaging as part of a voluntary program supported by the dairy industry. In other provinces, voluntary programs typically end when a regulated stewardship program, such as MMSW's WPP Stewardship Plan, becomes operational.</p>	
Steward Association	<p>In general, AHAM supports Multi-Material Stewardship Western's (MMSW) revised plan to fulfill obligated stewards' obligation to manage the collection and recycling of Packaging and Printed Paper (PPP) in Saskatchewan.</p> <p>AHAM supports MMSW's approach for funding municipal residential services. It is important that the stewardship organization operates using fair market competitive forces. In regards to municipal or municipal designate services, there should be no "special status" provided. Producers respect and value the work of municipal partners and these relationships should be based on mutually beneficial contractual agreements. Entities should not be able to shift costs to others while holding onto the beneficial side of collected materials. AHAM supports MMSW's WPP Stewardship plan that will only provide funding for the collection and recycling of MMSW member's materials. Ensuring that funding is only for materials placed in the Saskatchewan marketplace by MMSW members addresses the issue of free-ridership from non-members and cross subsidization of materials by the program.</p> <p>Equally important is ensuring that packaging materials not intended to be handled and managed by the residential WPP program is not included in brand owners WPP calculation. As such AHAM agrees with the WPP Program plan that transportation and distribution packaging that is not intended for use or management in the home is not considered residential packaging; for example major appliance packaging that is removed by the delivery company at the time of appliance delivery. Recognizing the unilateral amendments imposed by the Government, AHAM supports how MMSW proposes to accommodate the exemption for all newspapers, regardless of size, and all businesses with annual revenue between \$2 and \$5 million. The transition and post-transition periods will increase the PPP responsibility to all obligated stewards to the best possible extent over two years. Most importantly, AHAM supports how the revised plan ensures full members of the program will only be responsible for the materials they place into the Saskatchewan marketplace and that MMSW's WPP Program will fulfill their regulatory obligation.</p> <p>Recognizing the Government will have control over material fees for the first two years of the program, AHAM is supportive of MMSW's process to include a fixed fee schedule which will be approved upon</p>	<p>Should the Minister approve the revised WPP Stewardship Plan, the Minister will be approving the steward fee schedule in Table 4.4 for the Transition Period.</p> <p>MMSW understands the need to fairly allocate costs, such as the operating reserve, across those businesses that are Members during the Transition Period as well as those businesses that become Members following the two-year transition exemption.</p> <p>Information on MMSW's annual budget, including the proposed use of fee revenue, is reported each year during MMSW's annual steward meeting in October. Information on the actual use of fee revenue will be set out in MMSW's audited financial statements.</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>approval of the revised plan. It is important that MMSW maintains this fee structure and works closely with the Government to ensure these fees are maintained over the two-year period. There is concern that fee structures will significantly fluctuate over the two-year period under the direction of the Government with instructions for MMSW to build its full program reserve fund, as outlined in the revised plan. Under such a scenario, increased fees could be used to build program reserves which will only be collected from full “members” at that time and exempt “registrant” companies from contributing. This is a scenario that demonstrates a form of inequity and company free-ridership. Government imposed fee increases to full member companies will indirectly result in full “members” paying exempt and transition companies’ share of the reserve fund. It is vital that MMSW communicate its process to build its reserve fund to all key stakeholders and indicate its intentions have all its “members”, current and future, participate in building the reserve fund. AHAM recommends all contributions intended to build program reserves be allocated based on companies’ reported PPP to the program and be apportioned over multiple years so that companies that are transitioned after the two-year exemption also contribute to the fund accordingly.</p> <p>AHAM would like to highlight the importance of MMSW continuing to represent industry interests. If the responsibility, management, and majority funding of the stewardship of PPP is to be undertaken by brand owners, stewards should be free to leverage market instruments to the fullest extent possible. Obligated businesses, including AHAM members, have invested significant resources in preparing for the launch of this program. The changes demanded and imposed by the provincial Government late last year disrupted the fundamental principles of the original MMSW WPP Stewardship Plan. Overall, AHAM is supportive of MMSW’s revised program plan which incorporates and fulfills the Government’s unilateral changes, but more importantly preserves member company interests while fulfilling their regulatory obligation.</p>		
Steward Association	<p>CCSPA member priorities for all of the waste diversion programs in Canada are: 1. good governance 2. due process 3. transparency with checks and balances, and 4. provincial harmonization. With regard to ensuring these priorities are met, only about half of our member companies who are stewards knew in a timely way of the consultation on the revised Saskatchewan WPP plan. The one month for providing comments during the busiest period of the summer season meant that even those aware were unable to respond. Member companies also missed the “fine print” at the bottom of a July 29 email about the August 12 webinar. CCSPA similarly became aware of the consultation and webinar only recently. In order that Associations as well as our member companies are able to provide timely and quality input, we offer two recommendations - that:</p> <p>1. Trade Associations such as CCSPA, which provide support to stewards and to CSSA by spreading the word to companies and by assisting members in consultations, be directly copied on all emails from CSSA and MMSW that are intended for stewards’ awareness. One of the roles of Associations is to ensure members have received important information and to emphasize the information whether it be for reporting due dates or for consultations, through regular Bulletins that we send to members. Our recommendation is based on the fact that getting all the feedback from stewards to ensure the program considers their comments, suggestions and concerns is in the best interests of everyone; and</p>	<p>Thank you for your comments on the consultation timeline and notification of the steward webinar. We understand that the summer months are busy for industry associations and their members with many competing priorities. Recognizing that the timing, while not ideal, was unavoidable, MMSW used a variety of channels to notify the steward community of the revisions to the WPP Stewardship Plan and the webinar, including an update to industry associations at our Industry Advisory Committee meeting on July 23, 2015 followed by a communique/webinar invitation to MMSW’s mailing list. Both stewards and trade associations are included in MMSW’s mailing list and are sent communiqués simultaneously. In addition, the revised Plan was posted on MMSW’s website with a call for stakeholder comments. We appreciate trade associations’ efforts to disseminate the information to their members.</p> <p>MMSW will execute a Service Agreement with each municipality wishing to participate in MMSW’s program. The payment formula for the Transition Period and Post-Transition Phase 1 set out in Table 4.2 is based on Manitoba</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>2. MMSW, as well as CSSA, highlight on their website, such as under the upcoming information sessions sections, when important consultations such as the August 12 MMSW webinar are planned. The information should be more prominent and available.</p> <p>CCSPA members rigorously assess the validity of all waste diversion plan inputs, across Canada. We understand that other trade associations have identified a series of omissions regarding the sources for calculations and assumptions made in the revised Saskatchewan WPP plan. Our members wish to ensure that reliable figures, linked to clear sources, are being used and to see details on which assumptions are derived. We also support other Associations in commenting that the revised Saskatchewan WPP Plan should provide detail on how municipalities would be accountable for their performance results. While it is reassuring on one hand, that for the first two years the fees will be unchanged versus fees presented in the fall 2014 information session for stewards, our members wish to ensure that no unexpected over or underpayments could result based on unclear sources of data. This has happened in other provinces in the past, leading to some surprising retroactive additional fees for member companies.</p> <p>CCSPA members stress the importance of harmonization across Canada and within provinces with regard to the type of materials collected, definitions and reporting systems, and with regard to process such as reporting and collection periods and the administrative side for stewards. Harmonization will achieve economy of scale for stewards as well as creating opportunities for managing waste in a more consistent manner and finding best market values for recovered materials for all programs. While the specific regulatory parameters of Saskatchewan must be met, it is important to our members that all programs, including the MMSW program, harmonize the funding framework across provinces to the greatest extent possible. We would like to understand how “best practices” from each of the programs (MMBC, MMSW, MMSM, SO) are reapplied. For example, the proposed new “per household basis” for payment to municipalities in the revised Saskatchewan WPP Plan may have merit; however, it is not being used in the other provinces. It would be helpful to know how this approach will incent municipalities to deliver the most efficient, cost-effective program for our members.</p>	<p>costs (as Saskatchewan costs won't be available until audits are carried out during Post-Transition Phase 1) and the assumption that participating municipalities will collect 60% of the packaging and paper supplied by MMSW Members. The 60% capture rate assumption is based on the performance of municipal residential collection programs in Manitoba. The payment formula will be updated for Post-Transition Phase 2 using actual costs from Saskatchewan programs and definitions of efficiency and effectiveness developed with the assistance of the Advisory Committee.</p> <p>Given the Minister's announcement in December 2014 permanently exempting any business that generates less than \$2 million in gross annual revenue, or generates less than one tonne of household packaging and paper annually or operates a single retail store and exempting for two years newspapers with annual revenue above \$2 million and all other businesses with annual revenue between \$2 million and \$5 million, the payment formula in the revised WPP Stewardship Plan is based on the quantity of packaging and paper supplied by MMSW Members (since MMSW will not know the quantity of packaging and paper supplied by exempt businesses) with an adjustment to represent the portion that is actually captured in municipal collection programs – assumed to be 60% of WPP available for collection. As MMSW Members supply across the province, the formula calculates a payment per household. The payment due to a specific municipality is calculated using the number of households served by its WPP collection system. The formula is designed to pay municipalities only for collection and recycling of packaging and paper supplied by MMSW Members.</p> <p>MMSW's Advisory Committee will be tasked with developing a payment methodology that encourages efficient and effective municipal program delivery for use during Post-Transition Phase 2.</p> <p>In BC, MMBC pays municipalities using a rate per household applied to households served.</p>	
Steward Association	The Canadian Vehicle Manufacturers Association (CVMA) representing FCA Canada Inc., Ford Motor Company of Canada, Limited, and General Motors of Canada Limited has reviewed the Waste Packaging and Paper Stewardship Plan date July 2015. The revised stewardship plan does not include information on the commitments made under the previous plan and what has been paid to date. As stewards have contributed to the Program, it would be useful for MMSW to share this information with stewards for transparency purposes.	The WPP Stewardship Plan is designed to meet the requirements of <i>The Household Packaging and Paper Stewardship Program Regulations</i> . As MMSW did not launch the 2013 WPP Stewardship Plan on January 1, 2015 as originally planned, MMSW Members received a Cost Recovery Invoice in January, 2015 for program start-up costs incurred up to 2014 and program management costs for 2015. The start-up costs included: program plan development, meetings with provincial and municipal governments, steward recruitment activities, execution of contracts with municipalities, execution of Membership Agreements with stewards, support for steward reporting, the	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
		<p>establishment of a fee schedule, establishing an office in Saskatoon, and holding webinars to keep stewards and stakeholders informed. It was decided to recover the full start-up costs, initially funded through a bank loan, due to the uncertainty caused by the Minister's December 2014 announcement introducing new exemptions and a requirement that the Minister approve fees. The invoice also included program management costs for 2015 to ensure MMSW could maintain its office and staff to continue discussions with provincial and municipal governments, administer 2015 steward reporting, and revise the WPP Stewardship Plan.</p>	
Steward Association	<p>Electronics Product Stewardship Canada members are mainly Voluntary Stewards in the MMSW-Saskatchewan Plan. We contribute a relatively small amount to the overall financing of packaging stewardship programs mainly through corrugated cardboard, polystyrene, LDPE film and other paper. However we are the main stewards of our packaging rather than our retail partners and we are concerned with program consistency, maintaining a level playing field and other issues that cross all product programs. We would like to take this opportunity to provide feedback on the Revised Program Plan.</p> <p>We feel the Stewardship Plan would be stronger and more credible if the plan was endorsed on the cover page by the major trade associations, Food and Consumer Products of Canada (FCPC) and the Retail Council of Canada (RCC). It would also helpful to add under the Regulations (1.1) that a 2006 Ministry funded Multi Material Recycling Program Advisory Committee issued a Final Report with recommendations, that actually make up the core of the MMSW Plan regarding funding, governance, Industrial, Commercial and Institutional volume (IC&amp;I), data, bridge financing, capital funding, municipal participation and steward costs. This would also serve to strengthen the credibility of the MMSW Plan.</p> <p>The Minister's Additional Requirements (1.2) and the section on Stewards (2.1) would benefit from clarity on whether the exemptions are for Saskatchewan based businesses only as is stated in the Minister's press release, or for all businesses that do less than \$2 million in gross sales in Saskatchewan or sell less than 1 tonne of packaging into the Province. For the benefit of a level playing field it is not reasonable to accept a flat fee of \$500 for exempted businesses that do not have to report sales data for transitioning purposes. The flat fee and data submission requirement should go together as a package, otherwise exempted businesses get credit and recognition for \$500 for not participating in any legitimate way in building the program. Although we understand that this is a request from the Minister, it should be denied by the Stewards of this program.</p> <p>It needs to be noted in the Minister's Requirements Section (1.2) that to date MMSW has invoiced Stewards/Members \$2.7 million to cover start-up costs, including a provision for wind up costs if the Plan is not approved. Since the Act was approved in 2002 and the Ministry developed guidance on a packaging program at their expense and since the Regulations were approved in 2013 and industry</p>	<p>MMSW welcomes the support of industry associations for the WPP Stewardship Plan. As the plan takes on legal status once approved by the Minister, endorsements will not be added to the cover page. However, MMSW does welcome written endorsements of the revised WPP Stewardship Plan and will post these endorsements on the MMSW website. In addition, comments submitted by stakeholders with MMSW's responses are included as this Appendix G.</p> <p>The Final Report of the 2006 Advisory Committee was not referenced during the development of MMSW's WPP Stewardship Plan.</p> <p>The Minister's exemptions apply only to businesses that are resident in Saskatchewan. Note Section 2.1, third paragraph which states: "A voluntary steward is not subject to the permanent or transition exemptions established by the Minister".</p> <p>The Minister established the annual flat fee of \$500 for newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million and exempted these businesses from reporting the quantity of packaging and paper supplied to Saskatchewan households. The \$500 fee is for registration and does not contribute to payments to municipalities to manage WPP.</p> <p>The revised WPP Stewardship Plan includes a payment formula in Table 4.2 to be utilized during the Transition Period and Post-Transition Phase 1. The payment formula is based on the quantity of packaging and paper supplied by MMSW Members with an adjustment to represent the portion that is actually captured in municipal collection programs – assumed to be 60% of WPP available for collection. The application of the 60% capture rate to the tonnes of packaging and paper supplied by MMSW Members is done in aggregate, not by type of packaging or paper. The final paragraph in Section 4.4.1 is</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>filed a formal Plan, considerable resources have gone towards agreeing on the elements of an operations plan. One of the most obvious omissions in the Revised Plan is how to avoid the very real scenario of municipalities asking for funding for materials that are not part of the MMSW program. This has been an area of conflict in both the Quebec and Ontario programs with municipalities and should be addressed in the Plan. We do not support that members of this program carry the financial burden for producers that are either exempted or not addressed via this regulation. Another significant omission is a more detailed description of how the removal of small businesses in Saskatchewan and newspapers has impacted the financing of the program since the last Plan was submitted in 2013. The fees to be paid by the remaining obligated Stewards have not been revised. The assumption is that Stewards are only paying for their materials meaning that municipalities will be financing the shortfall without knowing in advance what that shortfall will be. This has to be stated within the Plan for approval by the Minister. It is not sufficient to say that Stewards will only pay 75% of their obligation. Newspapers and exempted materials will likely be collected and disputes will occur over payment. We recommend that financial elements of this plan are revised to reflect this very point and it is made available for review by all stakeholders to ensure everyone understands their obligations and the implications of this change.</p> <p>Additionally, the budget for the Program Plan is not included. This element should be included so Stewards have clarity of expectations on all sides, before, during and after the transition of all obligated materials into the program. The initial 2006 Ministry Proposal was for a Plan to cost \$2 million for basic transportation subsidy and central marketing of commodities to \$10 million for an Ontario style Blue Box. The MMSW projections, not included in the Plan, predict an annual cost of \$7.7 million, not including newspapers and exempted businesses. Additional financial detail is required, based on extrapolations from existing Provincial programs. The additional financial detail will help to manage expectations for Stewards, Municipalities and the Ministry. It is an important part of the approval process.</p> <p>Under Measurement (4.6), as required by the Regulation, Greenhouse Gas Emissions will need to have an agreed upon methodology for reporting within 3 years. This sets a precedent that is complex in terms of compliance. The intent of this regulation is to promote waste diversion. To expand to GHG emission reporting, there needs to be more discussion over the next 3 years on accountabilities for data collection, which should be framed in the context of a national agreement on methodology in order to be meaningful, with the support of municipalities for data collection and the province on methodology. A GHG data collection methodology should be consistent on a national level and be derived from internationally agreed upon standards.</p>	<p>explicit that MMSW will not pay municipalities to manage WPP supplied by exempt and non-compliant stewards or by stewards that are part of an approved product management program for packaging and paper other than MMSW's WPP Stewardship Plan. Municipalities are responsible for the cost of managing WPP that was not supplied by MMSW Members.</p> <p>As payments to municipalities using the payment formula in Table 4.2 are based on the quantity of packaging and paper supplied by MMSW Members, the fees paid by Members as set out in Table 4.4 (less program administration) yield the amount available as payments to municipalities. If MMSW has fewer Members due to the Minister's exemptions, the quantity of packaging and paper supplied will be less and the amount of fee revenue and the amount available as payments to municipalities will both be proportionately less. If MMSW has more Members due to its efforts to encourage companies to join MMSW, the quantity of packaging and paper supplied will be greater and the amount of fee revenue and the amount available as payments to municipalities will be proportionately more. The fee schedule in either case would be as set out in Table 4.4 in the revised Plan.</p> <p>A reference has been added to the revised Plan noting that the tonnes reported as collected and recycled by municipalities registered with MMSW will include packaging and paper supplied into those municipalities regardless of whether the supplying business is exempt or obligated under the Regulations and, if obligated, whether the supplying business is compliant or non-compliant.</p> <p>The revised WPP Stewardship Plan is being submitted for the Minister's approval. Steward fees for the Transition Period have been included to respond to the Minister's requirement to approve these fees. It is inappropriate to include MMSW's annual budget in a document that is subject to Ministerial approval. Information on fees received and disbursement of those fees to administer and operate the program is provided during MMSW's annual steward meeting in October and in the audited financial statements that will be part of MMSW's annual report.</p> <p>As provinces other than Saskatchewan (such as BC) have required GHG reporting, CSSA, as part of its services to MMSW (and MMBC), is working to develop a national approach to GHG tracking and reporting.</p>	Section 4.6.1

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
Steward Association	<p>FCPC and its members are committed to environmental sustainability and we support waste diversion and producer responsibility that is based on the principles of fairness and environmental benefit. Our industry plays a critical role in legislated packaging stewardship programs and many of our members joined MMSW to fulfil their regulatory obligations, as per <i>The Household Packaging and Paper Stewardship Program Regulations</i>.</p> <p>While we are pleased that the revised program plan has stated that “MMSW will not fund municipalities to collect or recycle WPP supplied by exempt and non-compliant stewards” (page 12), we remained concerned with the government’s December 18th decision. FCPC believes that there must be a level-playing field with all stewards paying their fair share of costs, and that no one sector should receive preferential treatment over another. Yet the governments’ requested exemptions of newspapers and businesses with gross revenue under \$5 million, does give preferential treatment to certain stewards at the expense of others. This contradicts the important principles of fairness and a level playing field that stewardship programs should be based upon. To date, obligated businesses – including FCPC members – have already invested significant resources in helping to fund the development of the program and in preparing for its original launch. There are a number of activities, requiring time and money, that obligated businesses have to do to prepare for any new industry-funded stewardship program, including understanding their legal and regulatory obligations; compiling data of the quantity of packaging and paper supplied to Saskatchewan households; modifying their internal data management systems to track designated materials and packaging to be captured under the program; and budget accordingly in order to ensure funds are available to meet their obligations.</p> <p>In addition to the above, MMSW stewards have also incurred costs to cover MMSW program start-up and program management costs, as per the Cost Recovery Invoice (dated January 1, 2015). While MMSW has provided qualitative information on what those funds were used (e.g., plan development, meetings, steward recruitment activities, execution of contracts, etc.) no detailed quantitative information has been provided (other than knowing that the lump sum of start-up costs equates \$1.2 million). As such, it would be helpful if the revised program plan included information on MMSW’s financial position, e.g., its budget, expenditures to date, and future projections once all obligated materials are brought into the program following the government’s two-year transition period. The additional financial detail will be helpful as stewards – who require predictability and stability – prepare internal budgets related to their provincial stewardship obligations.</p>	<p>The revised WPP Stewardship Plan is being submitted for the Minister’s approval. Steward fees for the Transition Period have been included to respond to the Minister’s requirement to approve these fees. It is inappropriate to include MMSW’s annual budget in a document that is subject to Ministerial approval. Fees for the following year are presented to stewards in Q4 at the annual steward meeting. In advance of this meeting, a document is distributed to all Members and is made available on the MMSW website outlining the program’s performance in the prior year, the status of current year performance, a projection of next year’s performance to which fees are tied and the next year’s fee schedule. Attendees are provided an opportunity to ask questions about fees, costs and other matters that impact the budget that forms the basis of the fees. Information on the disbursement of fees will be provided in the audited financial statements.</p> <p>As MMSW cannot predict which businesses have annual gross revenue between \$2 million and \$5 million or which businesses will choose to be non-compliant, MMSW has not prepared projections for Post-Transition Phases 1 and 2.</p> <p>As payments to municipalities using the payment formula in Table 4.2 are based on the quantity of packaging and paper supplied by MMSW Members, the fees paid by Members as set out in Table 4.4 (less program administration) yield the amount available as payments to municipalities. If MMSW has fewer Members due to the Minister’s exemptions, the quantity of packaging and paper supplied will be less and the amount of fee revenue and the amount available as payments to municipalities will both be proportionately less. If MMSW has more Members due to its efforts to encourage companies to join MMSW, the quantity of packaging and paper supplied will be greater and the amount of fee revenue and the amount available as payments to municipalities will be proportionately more. The fee schedule in either case would be as set out in Table 4.4 in the revised Plan.</p>	
Steward Association	<p>Newspapers Canada notes that many of the revisions are focussed on the need for adjustments resulting from the two-year transitional program announced by the Hon. Scott Moe in December 2014. While we appreciate why the government’s policy change would require some adjustment in the MMSW plan, we are disappointed that MMSW didn’t use this opportunity to address long-standing concerns about its approach to fees setting and the need to strengthen the environmental foundations that the whole structure should rest. We would ask that MMSW consider whether additional revisions could be undertaken to strengthen the plan in a way that addresses concerns about its approach to setting fees, the role that the fee schedule can play in supporting environmental objectives, and the</p>	<p>The WPP Stewardship Plan has been revised to provide clarity that the requirement to register and pay the annual \$500 fee established by the Minister in December 2018 applies to newspapers with annual revenue over \$2 million.</p> <p>The WPP Stewardship Plan is designed to meet the requirements of <i>The Household Packaging and Paper Stewardship Program Regulations</i> including the environmental goals set out in these Regulations.</p>	Section 1.2 and Section 2.1

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>need for greater transparency and accountability to stewards as well as to the broader public. With respect to the matter of accountability, Newspapers Canada has long taken the position that there is a <i>public interest</i> in stewardship programs that must be recognized within their operations, as well as with respect to an oversight role government should play. While we accept the principal that stewards should maintain principally responsible for the system they manage, this should not be without limits. We would advise that MMSW consider the degree to which it should be accountable to other stakeholders, to government and to the public. In our view, MMSW would only be strengthened through steps that improve transparency and broader accountability to both its members and to the community at large.</p> <p>Newspapers continue to be concerned about any potential for significant new costs to be imposed on them, as well as the lack of predictability and stability of future fees. Newspapers maintain the position that they should not be required to pay stewardship fees in recognition of a number of attributes specific to newspapers and have repeatedly advised the government of our view in the matter. On that point, it is important to acknowledge that recent policy and regulatory developments have now put Canada in a unique position in which we are the only country in which newspapers are required to pay into community or industry recycling programs; all other comparable jurisdictions have maintained an exemption for newspapers from their various product stewardship regimes. At a time in which newspapers are facing so many challenges to its business model, it is interesting to note that <i>the single biggest threat to the industry today is the cost of recycling</i> programs. The imposition of significant new costs would badly hurt the sector and have serious consequences for publications and the communities they serve. As newspapers have very few options to charge these cost back to the consumer (i.e. most of Saskatchewan's newspapers are free publications, supported by advertising), they would need to cut expenses elsewhere in order to pay new stewardship fees. This could mean a reduction in the number of journalists covering news in our communities, reductions in the frequency of publication, or even result in the closure of some newspapers. This is an outcome that we are certain that nobody would want to see. We support the previous minister's policy decision to create a two-year transitional program and a new medium-sized business category, which was also extended to include larger size newspapers while maintaining the small business exemption for those under \$2M. The MMSW plan acknowledges that change, however the way the plan has been drafted has created some confusion about whether it is consistent with the minister's announcement of December 2014. In our view, the MMSW plan would benefit by providing clarity as to the fact that newspapers fit into one of two categories: 1) smaller-sized newspapers continue to be covered under the small business exemption (\$2M threshold) and, 2) the requirement for registration and the \$500 fee for medium-sized businesses apply to businesses between \$2M and \$5M <i>as well as larger sized newspapers</i>. Newspapers under the \$2M threshold are not required to register and pay the \$500 fee that applies to medium-sized business. With respect to the minister's announcement, we should note that the MMSW plan actually gets the date incorrect. Minister Moe announced the transitional program in December 2014, <i>not 2013</i> as it appears on page 6 of the draft plan. This should be corrected. As we look beyond the end of the two-year transition period, we remain concerned about how MMSW is operating its program and its approach to future fee setting. In particular, there is a</p>	<p>Steward fees are calculated using a fee-setting methodology that, once established, remains in use without change until a subsequent review process results in recommendations to modify the methodology. The fee methodology is grounded in certain principles such as ensuring each material pays its fair share of costs and cross-subsidization between materials is avoided. While the fee-setting methodology itself does not change each year, the data entered into the fee-setting methodology does change each year – for example, the quantity of packaging and paper supplied by Members, municipal costs and MMSW's administrative costs. However, the method to allocate these costs across the materials remains the same year-over-year. The methodology has been communicated to stewards in webinars and is reflected in each MMSW Membership Agreement. MMSW, through its affiliation with CSSA, also hosts an annual meeting for stewards in Q4 to present the fees for the following year. Attendees are provided an opportunity to ask questions about fees, costs and other matters that impact the budget that forms the basis of the fees. MMSW Members and Registrants will be invited to participate in this annual meeting.</p> <p>Periodically the fee-setting methodology is reviewed and updated through consultation with stewards. MMSW is participating in a CSSA-sponsored review process currently underway, led by a committee comprised of approximately 20 stewards. This committee has invited submissions and/or presentations from interested stakeholders to ensure consideration is given to issues and concerns such as those related to the environmental impact of materials supplied into the residential market. CSSA is reporting on the activities of the committee to the broader steward membership through regular electronic newsletters and periodic information webinars. Currently, MMSW Members are included in this communication process. When newspapers with annual revenue over \$2 million and other businesses with annual revenue between \$2 million and \$5 million have registered with MMSW, these Registrants will receive regular communications with information about the fee-setting methodology review process.</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>lack of faith among our members that MMSW's approach allocates costs in a fair and appropriate manner or that it is built to support fundamental environmental goals. In order to increase the confidence of stewards in MMSW, we believe that the MMSW Program Plan should provide greater transparency about its future fee setting methodology, as well as be structured in a way that can provide greater predictability and stability over the long term. We recognize that this would create some challenges; however the impact on businesses of not being able to plan around an unstable and unpredictable fee schedule is very real. We should acknowledge this as a legitimate concern and take steps to minimize its impact. The fee setting methodology should also rest on an "environment first" principal. Saskatchewan's waste packaging and paper stewardship regulations come under the authority of the Minister of the <i>Environment</i> and were done so with some clear environmental purposes in mind. In other words, we believe that MMSW should be looking to ensure that its program plan should be built around the need to address important environmental concerns, not simply be a vehicle for financing municipalities. For example, the plan and approach to fee setting could do more to consider the "all in" environmental benefits and costs of its stewardship program, including the broader environmental impacts associated with recycling (e.g. GHG emissions). The approach to fee setting should also keep in mind the goal of increasing diversion rates and, in that sense, should include some mechanism to credit or reward those materials that are achieving close to 100% diversion.</p> <p>We believe that the revised program plan has been a missed opportunity to address a number of outstanding concerns of stewards, including the province's newspapers. Of particular concern is the fact that the revised plan does nothing to address ongoing concerns over transparency and accountability, nor moves the needle with respect to the environmental impacts. We would hope that the MMSW board takes an opportunity to consider the ways the program plan itself can offer improvements in these areas and, ultimately, build confidence among all program stewards as well as the public.</p>		
Steward Association	<p>I wish to thank you for holding the webinar on August 12 and express my regret in not being able to participate. Despite your email to stewards on July 29<sup>th</sup>, the message about the impending webinar was noted only at the very end of the email, arguably making the notice of the webinar obscure to stakeholders. While it is my fault for missing it, many other stewards and associations were also unaware of the event, so there may be some legitimacy to this comment. In future, it would be helpful if notice of an upcoming event could be prominently featured at the beginning of a communication so it is more visible. Adequate time for notice is also appreciated. Summer is a busy time and two weeks' notice for a meeting (when many may be on holidays) with another roughly two weeks for comment makes it very difficult for stewards and stakeholders to participate and provide meaningful comment.</p> <p>As provinces roll out new stewardship programs for both packaging and even end-of-life residual product stewardship, it becomes increasingly clear that there is a pressing need for harmonization among the provincial programs. Interprovincial co-operation on definitions, communications to all stakeholders (including homeowners), funding methodology, reward and incentive structures, handling</p>	<p>Thank you for your comments on the consultation timeline and notification of the steward webinar. We understand that the summer months are busy for industry associations and their members with many competing priorities. Recognizing that the timing, while not ideal, was unavoidable, MMSW used a variety of channels to notify the steward community of the revisions to the WPP Stewardship Plan and the webinar, including an update to industry associations at our Industry Advisory Committee meeting on July 23, 2015 followed by a communique/webinar invitation to MMSW's mailing list. Both stewards and trade associations are included in MMSW's mailing list and are sent communiques simultaneously. In addition, the revised Plan was posted on MMSW's website with a call for stakeholder comments.</p> <p>Regarding your comments on the need for harmonization, MMSW forms part of the Canadian Stewardship Services Alliance (CSSA). CSSA's mandate is to</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>facilities resulting in economies of scale and the like would assist in harmonizing the patchwork of programs unfolding across Canada. While much of Saskatchewan's program may now be set as a result of the Minister's direction, it is worth noting that from an administrative viewpoint, much can still be done. One area of harmonization over which Canadian Stewardship Services Alliance can exercise direction is that of the process, reporting periods &amp; collection periods and generally harmonization of the program administration to provide more consistency for steward reporting of provincial programs. The resulting reduction in administrative burden and confusion will go a long way to increasing efficiencies for producers and stakeholders and it will greatly improve the diversion of waste packaging in Saskatchewan and indeed across Canada.</p> <p>The development of a sound stewardship plan is challenging yet Premier Tech Home &amp; Garden, like other stewards and the associations representing them, all appreciate programs based on:</p> <ul style="list-style-type: none"> <li>- Due process and the time to develop the program, as it will go a long way to ensuring equitable treatment among program stakeholders.</li> <li>- Good governance of the program and a robust dispute resolution mechanism.</li> <li>- Transparency for stewards and stakeholders, coupled with checks and balances which help to ensure transparency and good governance.</li> <li>- Harmonization, which can be achieved as noted above, despite differences in the diversion requirements at the provincial level.</li> </ul> <p>The provision for a de minimus is both useful and equitable and I believe that stewards will agree in principle with the exemption. While this de minimus may now be fixed for WPP, I would suggest caution as the concept may be applied to other programs in future. As for the packaging program, it is quite logical for small, single store outlets to be excluded from the program. However, there could be many examples of larger, single store businesses who are largely importing products, which would qualify for the exemption but due to the nature of their business, contribute more packaging to the waste stream than larger national brand suppliers who are included by virtue of their sales volume. That scenario would seem inequitable to the many stewards who wish to exercise good stewardship by participating in the diversion program. This inequity could become even more acute in the case of household hazardous waste.</p>	<p>deliver administrative functions related to operating stewardship programs to achieve greater administrative efficiencies and less complexity for stewards who must report to multiple jurisdictions across Canada. CSSA works to harmonize the administrative aspects of steward reporting and fee payments where possible given the constraints of differing provincial legislation.</p> <p>MMSW acknowledges that annual sales may not reflect the volume of packaging supplied to households and that there may be examples of a business that operates a single retail store that generates more household packaging and paper than a business with annual revenue above \$2 million. However, the Minister established the permanent and transition exemptions that now apply to the WPP Stewardship Plan.</p>	
Steward Association	<p>RCC understands that a true level playing field in Saskatchewan is unlikely following the changes imposed by the Government of Saskatchewan in December 2014 as newspapers and all businesses with revenues below \$5 million are temporarily exempted and businesses with revenues below \$2 million are permanently exempted from funding the program. In this regard, RCC acknowledges the efforts made by MMSW to limit the costs incurred by current MMSW members in funding the program. Limiting funding to only the portion of fibres and packaging supplied by MMSW members is a reasonable approach to protect MMSW members from exaggerated stewardship fees. However, the definition of stewards provided in the plan should be clarified to state that the exemptions are for businesses with less than \$2 M in gross sales in Saskatchewan or for those who supply less than 1</p>	<p>The description of the categories of stewards in Section 2.1 has been revised to provide clarity that the references to generating less than \$2 million, more than \$2 million and between \$2 million and \$5 million in gross annual revenue, generating less than one tonne of household packaging and paper annually and operating a single retail store each apply to Saskatchewan.</p> <p>Note Section 2.1, third paragraph which states: "A voluntary steward is not subject to the permanent or transition exemptions established by the Minister".</p> <p>MMSW executes a Service Agreement with each municipality wishing to</p>	Section 2.1

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
	<p>tonne of fibres and packaging into the province.</p> <p>Generally speaking, RCC members understand that the changes imposed by the government called for a tailored transition-oriented program plan. However, as it is currently proposed, retailers would be facing yet another different funding framework. As much as RCC understands that a per household basis for payment to municipalities is the mechanism that ensures MMSW is only paying for its members' tonnage, this approach doesn't provide any incentive for municipalities to improve their program performance. RCC would like to see the approach MMSW will use to assess municipal performance clearly defined. In the absence of such details, the plan should at least indicate what is to happen if a municipality doesn't comply with the policies and procedures for household/depot collection services in Appendix B beyond a general mediation/arbitration process. RCC also calls for a detailed approach similar to the one provided in Appendix C on removing PPP generated by the ICI sector.</p> <p>Stating how the removal of small businesses and newspapers in Saskatchewan has impacted the financing of the program would also add to the revised plan's credibility. In the same way, the revised plan should include a revised budget as well as program projections taking into account newspapers and exempted businesses.</p> <p>RCC members have identified a series of important omissions regarding the sources for calculation assumptions made in the plan. Few are clearly identified and stewards would be more comfortable using reliable figures linked to well-known sources. For instance, RCC would like calculations to be provided in the appendices to better understand how MMSW determined a 60% capture rate. As much as it can be understood that this rate is based on rounding the most recent observed rates in Manitoba, questions remain regarding this type of assumption. Providing the details on which this assumption is based would greatly enhance the plan's credibility. Also, more details are required regarding how often the capture rate is to be reviewed. The plan does mention it will be reviewed periodically, but considering the importance of each item in the funding calculations, review dates should be clearly set in the plan. In a similar fashion, RCC would like the plan to detail how rejected materials or non-PPP materials provided by MRFs will be attributed to a specific municipality if a MRF typically serves more than a single municipality. In general, RCC found that the current version of the plan lacks details on how municipalities would be accountable for their performance results or for any non-compliance with the policies stated in the plan.</p>	<p>participate in MMSW's program that includes termination provisions if the municipality does not comply with the policies and procedures in Appendix B. The payment formula for the Transition Period and Post-Transition Phase 1 is based on Manitoba costs (as Saskatchewan costs won't be available until audits are carried out during Post-Transition Phase 1) and the assumption that participating municipalities will collect 60% of the packaging and paper supplied by MMSW Members. The 60% capture rate assumption is based on the performance of municipal residential collection programs in Manitoba. Please refer to page 23 of the CSSA pre-read document for the annual steward meeting on October 15, 2014 where Manitoba's recycling rate for 2012 (54.1%) and for 2013 (63%) are listed. The average of these rates is 58.5%, consistent with the 60% capture rate in the payment formula in Table 4.2.</p> <p>As the costs and capture rates being used in the payment formula in Table 4.2 are based on Manitoba data, the cost and collection performance of Saskatchewan programs during the Transition Period and Post-Transition Phase 1 do not affect payments to Saskatchewan municipalities or the cost of the MMSW program. The 60% capture rate will be reviewed if data compiled on Saskatchewan programs suggest that a majority of municipalities registered with MMSW are achieving capture rates in excess of 60%.</p> <p>MMSW is not able to quantify packaging and paper supplied by exempt and non-compliant businesses. As such, MMSW has developed a methodology to pay municipalities to collect and recycle 60% of the packaging and paper supplied by MMSW Members. MMSW is continuing efforts to communicate with and register businesses that are obligated during the Transition Period in order to increase its membership.</p> <p>The payment formula in Table 4.2 calculates payments to municipalities for collecting and recycling 60% of the packaging and paper supplied by MMSW Members. The final paragraph in Section 4.4.1 is explicit that MMSW will not pay municipalities to manage materials that are not WPP, WPP supplied by exempt and non-compliant stewards or by stewards that are part of an approved product management program for packaging and paper other than MMSW's WPP Stewardship Plan. Municipalities are responsible for the cost of managing materials that are not WPP and WPP that was not supplied by MMSW Members.</p> <p>The payment formula will be updated for Post-Transition Phase 2 using actual costs from Saskatchewan programs and definitions of efficiency and effectiveness developed with the assistance of the Advisory Committee.</p>	

Stakeholder Sector	Question and/or Comment	Response	Revisions Reflected in 2015 WPP Stewardship Plan
		<p>As payments to municipalities using the payment formula in Table 4.2 are based on the quantity of packaging and paper supplied by MMSW Members, the fees paid by Members as set out in Table 4.4 (less program administration) yield the amount available as payments to municipalities. If MMSW has fewer Members due to the Minister's exemptions, the quantity of packaging and paper supplied will be less and the amount of fee revenue and the amount available as payments to municipalities will both be proportionately less. If MMSW has more Members due to its efforts to encourage companies to join MMSW, the quantity of packaging and paper supplied will be greater and the amount of fee revenue and the amount available as payments to municipalities will be proportionately more. The fee schedule in either case would be as set out in Table 4.4 in the revised Plan.</p> <p>The revised WPP Stewardship Plan is being submitted for the Minister's approval. Steward fees for the Transition Period have been included to respond to the Minister's requirement to approve these fees. It is inappropriate to include MMSW's annual budget in a document that is subject to Ministerial approval. Fees for the following year are presented to stewards in Q4 at the annual steward meeting. In advance of this meeting, a document is distributed to all Members and is made available on the MMSW website outlining the program's performance in the prior year, the status of current year performance, a projection of next year's performance to which fees are tied and the next year's fee schedule. Attendees are provided an opportunity to ask questions about fees, costs and other matters that impact the budget that forms the basis of the fees. Information on the disbursement of fees will be provided in MMSW's audited financial statements.</p>	

## Appendix H – Consultation Comments on 2013 Plan and Responses

Stakeholder Sector	Question and/or Comment	Response	Reflected in 2013 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. 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>

Stakeholder Sector	Question and/or Comment	Response	Reflected in 2013 WPP Stewardship Plan
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.</p> <p>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.</p> <p>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"> <li>• 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.</li> <li>• 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.</li> </ul>	<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>

Stakeholder Sector	Question and/or Comment	Response	Reflected in 2013 WPP Stewardship Plan
	<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>	

<b>Stakeholder Sector</b>	<b>Question and/or Comment</b>	<b>Response</b>	<b>Reflected in 2013 WPP Stewardship Plan</b>
	<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><b>Use of Manitoba data</b> 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><b>Definitions of efficiency and effectiveness</b> 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? 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>

Stakeholder Sector	Question and/or Comment	Response	Reflected in 2013 WPP Stewardship Plan
	<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>	

Stakeholder Sector	Question and/or Comment	Response	Reflected in 2013 WPP Stewardship Plan
	<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 2013 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 2013 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&amp;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 2013 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 2013 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 2013 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 2013 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 &amp; 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 2013 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>		

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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.