

Development of a Multi-Material Recycling Program in Saskatchewan - Report on Consultation

1 Introduction and Background

The establishment of a multi-material recycling program (MMRP) for household printed paper and packaging (PPP) is a clear priority for the Province of Saskatchewan that has been expressed publicly by Premier Wall, Minister of Environment Heppner, Legislative Secretary Ottenbreit, and others. The long-standing need for such a program and the overall improvement of recycling services in the province have been voiced by various stakeholder groups in the province. Significant fluctuations in the recyclable material markets brought on by this past recession have further emphasized the necessity for a sustainable funding mechanism for recycling programs.

2 Objective and Scope of the Consultation

The Ministry of Environment has embarked in a consultation process to seek the input of all affected stakeholders on the key aspects related to the implementation of a province-wide Multi-Materials Recycling Program. A Consultation Paper outlining the preferred option and providing the necessary information to enable informed participation by stakeholders in the consultation process was released on April 21st, 2010¹. Subsequently, a multi-stakeholder consultation was held on May 4th, 2010. The scope of this consultation was to gather input on the MMRP preferred option concept.

3 Elements of the Consultation

The various elements related to the consultation efforts that have been carried out to date are outlined below.

3.1 Website

The Saskatchewan Multi-Material Recycling Program Consultation website was launched April 21st at www.mmstewardship.ca. The Consultation Document as well as details of the March 4th Consultation Event were posted to the website.

¹ See www.mmstewardship.ca/pdf/consultation_paper_april21.pdf

3.2 Database of affected stakeholders

A database of potentially affected stakeholders was developed. Different sources of information were drawn upon for the various stakeholder groups, including Scott's online business directory and a list of all municipalities provided by the Saskatchewan Ministry of Environment.

3.3 Electronic Notice to Affected Stakeholders

An electronic notice was sent to all stakeholders on April 21st informing them of the May 4th consultation event as well as of the availability of the Consultation document on the mmstewardship website. A reminder to register for the event was sent on April 28th.

3.4 Advisory Committee

A Joint Advisory Committee, co-chaired by a municipal representative and an industry representative, was established to oversee the MMRP consultation process and to provide recommendations to the Ministry of Environment and the Stewardship Responsibility Organization. The members of the committee are presented below.

Table 1 Advisory Committee Members & Affiliation

Name	Affiliation
Allen Langdon (co-chair)	Canadian Council of Grocery Distributors (CCGD)
Fred Clipsham (co-chair)	Saskatchewan Urban Municipalities Association (SUMA)
Al Heron	Saskatchewan Urban Municipalities Association (SUMA)
Lanny McInnes	Retail Council of Canada (RCC)
Rachel Kagan	Food and Consumer Products of Canada (FCPC)
Theresa McQuoid	Saskatchewan Scarp Tire Corporation
Joanne Fedyk	Saskatchewan Waste Reduction Council (SWRC)
Don Taylor	Saskatchewan Association of Rural Municipalities (SARM)
Wally Lorenz	Association of Regional Waste Management Authorities of Saskatchewan (ARWMAS)
Trevor Carlson	Federated Co-operatives Limited
Chris Potter (observer)	Saskatchewan Ministry of Environment (MOE)

3.5 Public Consultation Meeting

As previously stated, a public multi-stakeholder consultation meeting was held on May 4th 2010 in Saskatoon from 10 CST to 12 CST at the Saskatoon Inn Hotel and Conference Centre. Stakeholders had the option of taking part in this meeting either in person or via the internet (webcast).

The consultation included two question and answer periods. A summary of the questions posed (both by participants in the room and over the webcast) and the answers provided has been posted to the mmstewardship website².

3.6 Comment Submission

Stakeholders were invited and encouraged to provide comments on the Consultation Document and/or the contents of the May 4th consultation via an online comment form in MS Word that was posted to the mmstewardship website. The option of sending a personalized comment submission, either electronically or by mail, was also available to stakeholders. The comment period ran from May 4th to May 14th at 3 pm CST.

Stakeholders were notified electronically of the comment form on May 6th. A reminder to submit comments was sent on May 12th.

4 Outcome of May 4th Consultation Meeting

4.1 Attendance

A total of 180 stakeholders participated in the consultation via the webcast. A list of all webcast participants and their affiliation is presented in Appendix A.

A total of 41 stakeholders participated in the consultation in person. A list of in person participants and their affiliation is presented in Appendix B.

4.2 Comments Received

A total of 63 individual comment submissions were received during the comment period. A list of all the stakeholders who submitted comments is provided in Appendix C.

The majority of comments were received via the online comment form. Industry stakeholders and their associations jointly accounted for the largest number of submissions, as shown below.

² See www.mmstewardship.ca/pdf/consultation/may4_2010_QA.pdf

Table 2 Number of Comments Received by Type

Organization Type	Total Responses
Consumer Advocacy/ENGO	4
Public	1
Industry	21
Industry Association	14
Municipality	13
Service Provider	7
Waste Management Authority	3
Total	63

Note: for the purposes of recording comments, Industry and Industry Associations were collapsed together into a single category, as were Municipalities with Waste Management Authorities, and Public with Consumer Advocacy/ENGO

4.3 Summary of Comments

A high-level summary of the responses to each of the nine questions from the comment form for each stakeholder group is presented below. A full summary of all responses received is presented in Appendix D.

Question 1: 75/25 funding split

Industry and Industry Association: While some respondents support the proposed cost share model, a number of respondents prefer either greater or less industry funding. Some respondents opposed the preferred option arguing that industry did not have sufficient control over program operations despite bearing the majority of the financial risk, and others advocated a 50/50 share, in alignment with existing programs in other jurisdictions, such as ON and QC. A few respondents advocated a full EPR program, as it would shift costs fully from the tax base to consumers. A number of respondents were also concerned with the possible inefficiency of municipally operated programs, and recommended an emphasis on cost containment and greater explanation of efficiency and effectiveness criteria.

Municipalities & Regional WMAs: Respondents were divided over whether the split was appropriate; some were in favour, reasoning that any move toward EPR and user-pay was welcome, while others, particularly the biggest municipalities and regional associations advocated for the adoption of true EPR, pointing out that they still bore the cost of all unrecycled material as well. A number of respondents requested greater clarity on the details of the pay-out model to municipalities.

Service Providers (Haulers & Recyclers): Opposed to shared responsibility model and in favour of full EPR. Certain respondents believe that industry should not pass costs on to consumers.

ENGOS, Consumer Advocates & Public: Support full EPR and worry about the ability of northern communities to fund their portion of the program

Question 2: Materials Targeted

Industry and Industry Association: The majority of respondents were supportive of the obligated materials, although there was some disagreement about the exclusion of beverage containers, with some respondents advocating their inclusion as a means of offsetting the cost of other materials. In general, respondents advocated the desirability of alignment with other provincial programs in terms of reporting and designated materials (e.g. blank paper, recycled content packaging). Some respondents requested greater clarity on whether certain specific products were included. Respondents supported the exclusion of IC&I material, and advocated creating a provision for the exemption of materials that either do not go through the municipal waste stream or are not recycled. The operators of the SK Paint Stewardship Program (SPSP) advocated excluding paint containers, as these are already managed through SPSP and are not managed through the Blue Box program anywhere in SK, according to available information.

Municipalities & Regional WMAs: Respondents do not support the exclusion of IC&I material, especially cardboard, particularly in rural areas; one respondent suggested the establishment of a population threshold to determine whether a municipality's ICI material would be eligible. Respondents were divided over the exclusions of beverage containers, and concerned about unnecessary duplication of programs.

Service Providers (Haulers & Recyclers): Respondents strongly support the inclusion of material from IC&I sources. However, several respondents opposed the inclusion of glass with the other obligated materials, and some respondents expressed confusion about the products included under each category.

ENGOs, Consumer Advocates & Public: Do not support the exclusion of IC&I

Question 3: Program delivery (municipal control and compensation based on effectiveness and efficiency)

Industry and Industry Association: Respondents strongly support a funding formula that accounts for effectiveness and efficiency, and emphasized the importance of cost containment. One respondent advocated full industry control of post-collection in order to restrain costs. Several respondents complained that the setup unfairly implicated industry for costs, while allowing municipalities to retain control of program operational decisions.

Municipalities & Regional WMAs: Respondents requested further details about how the reimbursement will be calculated and which criteria will be accounted for, and are concerned that the criteria under consideration do not reflect their interests, particularly the cap on cardboard as a percentage of total waste collected. Respondents strongly believe that municipalities should retain autonomy over the provision of service and decisions affecting that.

Service Providers (Haulers & Recyclers): Strongly in favour of full municipal autonomy over all aspects of their recycling programs.

ENGOs, Consumer Advocates & Public:

Concern about the ability of small northern communities to participate in the program

Question 4: Governance (SRO and Advisory Committee make-up)

Industry and Industry Association: There is considerable division of opinion on this issue. Several respondents express support for the governance model, while others are critical of the position and existence of the advisory committee, advocating that its role be restricted to providing advice and not direction. There are also questions about how the Board and the Advisory Committee are constituted. One respondent advocated a greater role for municipalities on the SRO Board, although most respondents support industry-only representation. Finally, two stakeholders stated that industry should be able to comment on the draft Regulation (as opposed to the Advisory Committee only).

Municipalities & Regional WMAs: Respondents are broadly opposed to the present arrangement, preferring either that power reside with the advisory committee and not with the SRO Board, or that the SRO Board include municipal representation.

Service Providers (Haulers & Recyclers): All respondents were opposed to unilateral industry control of any aspect of the program, and one respondent proposed an entirely different approach centred on a Delegated Administrative Organization.

ENGOs, Consumer Advocates & Public:

Support more municipal representation in the governance of the MMRP

Question 5: Definition of Obligated Steward

Industry and Industry Association: While the majority of respondents support the recommended order of precedence, several respondents recommend a clearer definition of terms like 'obligation'. Respondents repeatedly argued for two issues: 1) the establishment of a *de minimis* criterion to relieve small companies of the burden of reporting, and 2) an allowance for voluntary stewards, enabling out-of-province brand owners to take responsibility for their PPP. Many respondents supported the principle of harmonization across jurisdictions.

Municipalities & Regional WMAs: In general, respondents were supportive, but there was some confusion about how stewards will be obligated in practice.

Service Providers (Haulers & Recyclers): No respondent took issue with the precedence of obligated stewards, but many used the question as a pretext to discuss funding (those responses will be detailed at the bottom under 'Other')

Question 6: Service Levels

Industry and Industry Association: Respondents are mostly supportive, however some recommend a firm definition of concepts such as 'efficiency' and 'effectiveness', and recognize the importance of cost controls. Some respondents would prefer to see either industry control of post-collection services or full funding of each municipality's chosen collection services. One respondent cautioned against an overly prescriptive approach to municipal service options, which might create inefficient programs.

Municipalities & Regional WMAs: Respondents strongly opposed the imposition of a threshold below which curbside will not be funded. They also oppose mandating curbside collection for larger municipalities. Many respondents questioned how the population threshold was arrived at, and how combined depot and curbside programs would be treated.

Service Providers (Haulers & Recyclers): A variety of suggestions for better options, but almost all respondents are united in their opposition to setting any sort of population threshold for funding curbside programs

ENGOs, Consumer Advocates & Public: Do not support the 25,000 population threshold, as it discriminates against most communities in SK.

Question 7: Timelines

Industry and Industry Association: Respondents are broadly opposed to the aggressive timelines and a number recommend a separate allowance of six months for both plan development and plan implementation. Many respondents also complain about the brevity of the comment period, and note that it has made it difficult to prepare and properly inform their submissions. A couple of respondents did offer support for the timelines.

Municipalities & Regional WMAs: Respondents expressed varying degrees of concern about the timeline. Some were satisfied, but others were critical, especially in light of their opposition to the proposals at the May 4th consultation. One expressed the suspicion that the main elements of the program had already been set and were not open to re-examination.

Service Providers (Haulers & Recyclers): Most respondents supported the timeline, although they acknowledged its ambition. One respondent objected to the tight timelines as leaving little room for consultation

Question 8: Oversight (Advisory Committee oversee consultation and advises MOE and SRO)

Industry and Industry Association: Mostly supportive, although several respondents are not satisfied with the degree of information the advisory committee has made available to date. The transparency and openness of the selection process was also questioned. Several respondents expressed support for emulating the governance model of waste diversion programs in other jurisdictions. One group – CCSPA – formerly requested a seat on the Advisory Committee.

Municipalities & Regional WMAs: Respondents broadly supported the composition and role of the advisory committee, but there was some desire expressed that the Ministry take a more active role in both policy and consultation oversight.

Service Providers (Haulers & Recyclers): Respondents were not pleased with the lack of opportunities for consultation up to this point and requested better communication from the advisory committee.

Question 9: Other Issues

Industry and Industry Association: A wide range of issues was addressed in this section. Several of these related to the Program Plan, including:

- the need for sector-based calculators, a *de minimis*, timelines, Voluntary stewards, reporting and payment)
- the pay-in model for stewards and how it should reward environmental friendly packaging

Other issues pertained to the Regulation, including:

- The need to harmonize with existing programs
- Giving stewards the option to run their own PPP recovery program
- Opposition against in-kind contribution

Other issues related to the background information presented in the consultation document, including:

- Proposed 60% target rate is too high
- How the estimated \$10 M of the program was calculated
- If the SARCAN and MMRP systems could be consolidated, the EHC funds currently collected by SARCAN would go a long way in financing the MMRP

Finally, some issues related to implementation, including:

- Questions around how the government bridge financing would be repaid
- Visible fees
- The need for the program to partner with the private industry and to leverage the private sector's existing services and infrastructure
- Fee setting
- Residents must have equal access to recycling programs for designated materials for which funding is being provided.
- Need for competitive bids in hiring consultants to help develop and manage the MMRP

Appendix A – Webcast Participants in May 4th Consultation Event

Table 3 Attendees Online at the May 4 Consultation

First Name	Last Name	Affiliation
Mark	Jacob	3M Canada
Darren	Ardell	A&W Food Services
Catherine	Ramsay	A&W Food Services of Canada Inc.
ANNE	STANDISH	A. LASSONDE INC.
Christine	Kor	Abbott
Darren	Palendat	AgraCity Ltd.
Susan	Peterson	Akzo Nobel Canada Inc.
Rick	Main	alberto Culver
Robin	Bellamy	Amway Global
Erin	Harrigan Podgaiz	Apotex
Beth	Meier	Arch Chemicals, Inc.
Terry	Yee	AstraZeneca Canada Inc.
Nancy	Wason	Bayer Inc.
Ted	Hollington	Bea Fisher Enterprises
David	Huettner	Behr Process Corporation
Kristen	Romilly	Best Buy Canada
Gary	Hall	BMW Group Canada
Devin	Cullen	Bulk Barn Foods Limited
Karlene	Henlon	Burger King
Jim	McKnight	Canada Dry Mott's, Inc.
Anne	McConnell	Canadian Consumer Specialty Products Association
Marilyn	Braun-Pollon	Canadian Federation of Independent Business
Sonia	Laratta	Canadian Tire Corporation, Limited
barb	Jusiak	CCGD
Jennifer	Tan	CDMI
Debbie	Thole	CDMI
David	Foster	Cdn. Home Builders' Association
Neha	Joshi	Church & Dwight Canada
Gary	St.Onge	City of Estevan
Roger	Brekko	City of Lloydminster
Rosalie	Brown	City of Meadow Lake
Max	Zasada	City of Moose Jaw
Stewart	schafer	City of North Battleford
Robert	Cotterill	City of PA
Arnie	Bauer	City of Regina
Michael	Latoski	City of Regina
Hal	Wilkie	City of Regina
Cheryl	Willoughby	City of Regina
Jesse	Watamanuk	City of Weyburn
Kelly	Kaban	City of Yorkton
Barry	Friesen	CleanFARMS inc.
Ed	Linton	Cloverdale Paint
Dermot	McDonagh	CNW Group
Don	Zilinskas	Comark Inc.
Cindy	Cale	Concentra Financial

First Name	Last Name	Affiliation
John	Davies	Coranco
Joelle	Assaraf	Costco
lucia	rapone	costco wholesale
Kristen	Nesom	Costco Wholesale Canada
steven	bruce	councillor
Melissa	Thiele	Crayola Canada
russel	hurst	croplife
James	Moser	Crown Enterprises Ltd.
kevin	kobelka	Danone Inc.
Elena	Papakosta	Dell Canada Inc
Stephanie	Kao	DPSG
Denise	Zimmermann	Eastman Kodak Company
Larry	Moore	Electrofederation Canada
John	Bailie	Electro-Federation Canada
Sarah	Gammell	Environment
Chris	Thomson	Environmental Advisory Group
Janet	Congdon	EPI
Lauren	Melucci	EPI
Ron	Mateas	Epson America
Vicky	Ball	Ferring
Angelo	Donoso	Fred Deeley Imports
Valerie	Arellanes	Gap Inc.
Valerie	Arellanes	gap, inc.
Gordon	Howarth	Gates canada inc
Terri	Robertson	General Electric
Jill	Carman	General Mills
Jim	Vandenharn	Heinz Canada
Donna	Houston	Henkel
Brandon	Seegmiller	Hewlett-Packard
Steve	Saunders	High Liner Foods Inc.
Laura	Selanders	Home Depot
David	Bois	Home Hardware Stores Limited
Amy	DeVries	Home Hardware Stores Limited
Tracey	Jones	Home hardware stores ltd
Akemi	Kitamura	Honda Canada Inc.
Andre	Brisson	Irving Consumer Products
Pat	Winstanley	John Deere Limited
Melinda	tan	Kao Brands Canada Inc
Dave	I'Anson	Katz Group Canada
Chetan	Patel	kleen-flo tumbler ind. ltd.
John	Brodner	K-Light Recycling
Holly	Gibb	KPMG
Razvan	Ionescu	Kraft Canada
Franc	Tomsic	Kraft Canada
ward	willson	Langenburg and district activity centre
Jeff	Epp	Leader-Post
Nicole	Petrisor	Leader-Post
Janis	Nichol	Lee Valley Tools

First Name	Last Name	Affiliation
Niraj	Patel	Lenovo (Canada) Inc.
Natalie	Arneri	Loblaw Companies Limited
Philippe	Vulliens	Logitech Europe SA
Aaron	Beres	Loraas Disposal Services
Isabelle	Cerqueira	M&M Meat Shops Ltd.
Elaine	Pollock	M.C. & District Opportuniities Inc.
Michael	Guerrero	Mad Catz
bruce	Godhe	Mallard diversified services
Joel	Grant	Maple Leaf Foods
Jeffrey	Fitzpatrick	McDonald's Restaurants of Canada Ltd.
Kenneth	Ready	McDougall Gauley LLP
Craig	Anderson	Melitta Canada Inc.
Trevor	Hiebert	Menno Ind
Mark	McKenney	MGM Management
Brian	Moroz	Mitsubishi Motor Sales of Canada, Inc.
William	Essex	Moen Inc.
Randolph	BRAATEN	Municipal Affairs
Bibi	Sahid	Nature's Sunshine Products
Angela	Dennis	Nestle Canada Inc
Steve	Summers	Nestle Purina PetCare Canada
Vanessa	McQuaker	Novartis consumer Health Inc.
John	Collins	Novartis Pharmaceuticals Canada Inc
Aileen	Burke	Ocean Spray
Patrick	Hatzis	OSRAM SYLVANIA
John	Mullinder	Paper Packaging Canada
Gina	Clement	Payless ShoeSource
Neil	Antymis	Pepsi Beverages Canada
Craig	Gammie	PPEC
Jerry	Monteiro	PPG Canada Inc.
Ray	French	R.M.of Montrose No. 315
Wayne	Reinson	Rail City Industries Inc
Dav	Russell	Recochem Inc
Merodee	Hassler	Red Coat Waste Resource Authority
Gene	Baniulis	Regens Disposal Ltd
chimene	Gowen	resers fine foods, inc
Sonia	Doan	Revlon Canada
Darren	Elder	RM of Wilton #472
Diane	Berleur	Rona
Patricia	Stanton	Royal Bank of Canada
Stephen	Rathlou	S.C. Johnson and Son, Ltd.
David	Thomson	Sage Environmental Corp
Bill	McLeod	Saputo
Julie	Paquin	Saputo
Bob	Hnetka	SARCAN Recycling
Corey	Adam	Saskatchewan Abilities Council
kent	smith-windsor	Saskatoon chamber
Monica	Pukas	SaskPower
Monica	Pukas	SaskPower
Valerie	Bertrand	Scotts Canada Ltd.

First Name	Last Name	Affiliation
Morena	Chui	shell canada
Rick	Posatiere	Sherwin Williams
Shabbir	Beawerwala	Shoppers Drug Mart
Barry	Citren	Sobeys
Malcolm	Viney	Sobeys
Brad	Ashdown	South Saskatchewan River Watershed Stewards
Mike	Elmgren	Southwest Waste Management Authority
Che-Wei	Chung	SUMA
Jenna	Bentley	Summerhill Impact
David	Watson	Sure-Gro Inc.
Christina	Kidd	Swaovski Canada Ltd
Diane	Nelson	Tahitian Noni International
Elaine	Raymond-Niesing	Targus
Ed	Kwiatkowski	The Great Canadian Bagel
Carol	Patterson	The TDL Group Corp.
Darcie	Cooper	Town of Lumsden
Darcie	Cooper	Town of Lumsden
Ellaine	Hawrylak	Town Of Maple Creek
jerry	cheshuk	town of nipawin
Steven	Piermantier	Town of Nipawin
Charmaine	Bernath	Town of Shaunavon
Lyle	Spetz	Town of Shaunavon
RITA	BASTIANPILLAI	TOWN SHOES LIMITED
Janice	Aaltink	Tree of Life Canada
BIANCA	De Graauw	TROPHY FOODS INC.
Michael	Cobb	TY Global Imports
Andrew	Gustyn	Unisource Canada
Tracey	Morden	Unisource Canada, Inc.
kevin	mcmurray	usana health sciences, inc.
Leanne	Latoski	Volkswagen Canada
Jeff	Cattanach	Wal-mart Canada
Diane	Gibson	Wal-Mart Canada Corp.
Dan	Rochette	Waste Management
Paul	Harris	Westward Parts Services
Andria	Brady	Weyburn Wor-Kin Shop
Warrington	Ellacott	Whirlpool Canada
Jean-Philippe	Boutin	Yellow Pages Group

Appendix B – In-Person Participants in May 4th Consultation Event

Table 4 Attendees In-Person at May 4 Consultation

First Name	Last Name	Affiliation
Kevin	Acton	SARC
Lanny	Baerwald	Plus Industries
Derrick	Bellows	City of Regina
Leon	Bourner	Waste Management of Canada Corp.
Steven	bruce	Town of Foam Lake
Annemarie	Buchmann-Gerber	Consumers' Association of Canada, Saskatchewan Branch
Michelle	Buckham	Town of Radisson
Trevor	Carlson	Federated Co-operatives Limited
Fred	Clipsham	SUMA
Sean	Collins	SARC
Kim	Cordes	Wheatland Regional Centre
Murray	Donohue	Village of Leask
Joanne	Fedyk	Sask. Waste Reduction Council
Audrey	Findlay	Consumers' Association of Canada, Saskatchewan Branch
Ken	Friesen	StewardEdge
Darlene	Geleta	Crown Shred and Recycling
Peter	Gerrard	Cosmopolitan Industries Ltd.
Kelly	Goyer	City of Saskatoon
Dwight	Grayston	Saskatoon Curbside Recycling
Ken	Gryschuk	Cosmopolitan Industries
Al	Heron	SUMA
Merv	Hey	Saskatchewan Association for Resource Recovery Corp.
Martha	Hollinger	Sask. Waste Reduction Council
Sean	Homenick	SARC
Ken	Homenick	SARCAN Recycling
Ian	Jensen	Prince Albert Daily Herald
Jim	Joanette	RM of Leask No. 464
Francis	Jungwirth	Columbian Industries
Rachel	Kagan	Food & Consumer Products of Canada (FCPC)
Marlon	Killaby	SK Ministry of Environment
Mark	Kizyma	Town of Radisson
Myron	Knafelc	ARWMAS
Walter	Kyliuk	Town of Radisson
Allen	Langdon	CCGD
Darrin	Langenfurth	All Green Recycling (Loraas Disposal)
Wally	Lorenz	Association of Regional Waste Management Authorities of Saskatchewan
Allan	Mann	The Leader-Post
ANNE	Mathewson	Assoc. of Regional Waste Mgmt Authorities of Sask.
Lanny	McInnes	Retail Council of Canada
Amy	McNeil	SARC

First Name	Last Name	Affiliation
Joan	Meyer	SWEEP
Joel	Mierau	Town of Dalmeny
Naomi	Mihilewicz	Sask. Waste Reduction Council
Keith	Moen	NSBA (North Saskatoon Business Association)
Duane	Mohn	North Central Sask Waste Management
James	Moser	SecureShred
Philip	Murphy	Waste Management, Inc.
Mindy	Neufeldt	RM of Laird #404
Cameron	Nicolle	valley Action Abilities
Olson	Or	Toyota Canada Inc.
Hugh	Otterson	Highway 55 Waste Management Corp.
Rick	Pederson	Town of Outlook
Chris	Potter	MOE
Sheri	Praski	City of Saskatoon
Dan	Rochette	Waste Management of Canada Corp.
Grant	See	Parkland Regional Waste Management Authority Inc. ARWMAS
Jack	Shaw	Crown Shred and Recycling Inc.
Cory	Shaw	Crown Shred and Recycling Inc.
Tom	Stock	Industry
Don	Taylor	SARM
Curtis	West	Loraas Disposal
Mark	Witrup	Ministry of the Environment
Dan	Wong	StewardEdge
Wendy	Yaworski	REACT Waste Management District
Fran	Yuzik	Columbian Industries
Ken	Zacharias	Western Producer Publications

Appendix C – List of Stakeholders who Submitted Comments

Table 5 List of Stakeholders who submitted comments during the comment period

First Name	Last Name	Title	Affiliation
Michael	Guerrero	Contracts Manager	Mad Catz Inc.
Jerry	Cheshuk	Director of Works and Utilities	Town of Nipawin
Jesse	Watamanuk	Engineering Assistant	City of Weyburn
Gary	Johnson	Administrator	Town of Eston
Dan	Knutson	Engineering Assistant	City of Swift Current
Dave	Pocock	Marketing Manager Consumer Products	K-G Packaging Inc.
Andria	Brady	Executive Director	Weyburn Wor-Kin Shop
Hubert	Diks	Director, Finance, Logistics & MIS	Sunstar Americas, Inc
Janice	Aaltink	Pricing & Systems Analyst	Tree of Life Canada Inc
Mike	Elmgren	Chairman	Southwest Waste Management Authority
Jeff	Mark	Manager	Bruno Savings & Credit Union
Diane	Nelson	General Manager	Tahitian Noni International
Grant	See	Vice Chair	Parkland Regional Waste Management Authority
Angie	Bugg		N/a
Wayne	Edwards	Vice President, EEMAC	Electro-Federation Canada
Mark	Jacob	Specialist, Packaging Engineering	3M Canada
Jerry	Monteiro	Manager, Distribution & Service Centre Administration	PPG Canada Inc
Amy	McNeil	Executive Director	SARCAN
Nicole	Monchamp	Administrator	Village of Buchanan
Brandon	Seegmiller	Environmental Programs Business Analyst	HP Canada
Annabel	Gills	Quality Assurance Manager	Shaklee Canada Inc
John	Barker	General Manager	Go Green Recycling Inc
Maura	Gillis-Cipywnyk	President	The Consumer Association of Canada (Sask Branch) Inc
Peter	Gerrard	Executive Director	Cosmopolitan Industries Limited
Tony	Bunz	CEO	New North (SANC)
John	Bailie	Director, Battery Section, EEMAC	Electro-Federation Canada
Elaine	Pollock		Maple Creek and District Opportunities INC
Andre	Brisson	Trade Compliance Manager	Irving Consumer Products
Stephen	Rosowsky	Operations Manager	Saskatchewan Abilities Council - Yorkton Branch
Wally	Lorenz	Chair	Association of Regional Waste Management Authorities of Saskatchewan
Joanne	Fedyk	Executive Director	Saskatchewan Waste Reduction Council
Che-Wei	Chung	Policy Advisor	Saskatchewan Urban Municipalities Association
Gina	Clement	Tax Department	Payless ShoeSource
Courtney	Hirota	Vice President - Manitoba-Saskatchewan	Canadian Restaurant and Foodservices Association

First Name	Last Name	Title	Affiliation
Krystle	Gonzalez	Supervisor, regulatory affairs & quality assurance	Mary Kay Cosmetics Ltd
Gene	Baniulis		Regens Disposal Ltd
Sheri	Praski	Manager, Environmental Services	City of Saskatoon
Greg	Vanderven		Amway Canada Corporation
Maureen	Paron	General Manager	West Yellowhead Waste Resource Authority Inc
Susan	Peterson		Akzo Nobel Canadian Inc
Rachel	Kagan	Senior Director, Environment and Sustainability Policy	Food & Consumer Products of Canada
Larry	Moore	Vice President of CAMA	Canadian Appliance Manufacturers Association
Ross	Creber	President	Direct Sellers Association
Carol	Patterson	Specialist, Environmental Affairs	TDL Group Corp
Michael	Smith	Sustainability Analyst	Sears Canada
Keith	Moen	Executive Director	North Saskatoon Business Association
Duane	Mohn	Manager, NCSWMC	North Central Saskatchewan Waste Management Corporation
Steve	Saunders	Director, Regulatory and Technical Services	High Liner Foods Inc.
Michael	Latoski	Strategy & Performance Consultant	City of Regina
Jennifer	Miller		Lung Assoc of Saskatchewan
Lanny	McInnes	Director, Government Relations & Member Services	Retail Council of Canada
Mindy	Neufeldt	Insurance Broker	Gossen Insurance Services Ltd.
Karen	Hou	Manager, Environment, Health and Safety	Canadian Vehicle Manufacturers' Association
Max	Zasada	Assistant City Engineer	City of Moose Jaw
Phil	Wrubleski	Executive Director	Saskatchewan Scrap Tire Corporation
Pierre	Petelle	Director, Regulatory Affairs and Non-Ag Uses	CropLife Canada
Allen	Langdon	Vice-President, Western Region	Canadian Council of Grocery Distributors
Shannon	Coombs	President	Canadian Consumer Specialty Products Association
Trent	Michelman	Municipal Manager	Town of Outlook
Mark	Kurschner	President	Product Care Association
Jan	Stout	Administrator Assistant	Town of Cupar

Appendix D – Comments Received

Table 6 Notable Responses to Question 1

QUESTION 1: Under the preferred MMRP option, industry would fund 75% of the program while municipalities would cover 25%. Is this the correct arrangement?			
Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOS, Consumer Advocates & Public
<p>Notable Comments:</p> <ul style="list-style-type: none"> - Seems correct, as it will force industry to be accountable, while minimizing the risk of abuse from other stakeholders - industry should fund 100%; taxpayers should not have to fund recycling through the tax base; 100% EPR will create a more reasonable product cost upfront and will encourage consumer consciousness and recycling participation - Support the shared responsibility model, as it financially implicates all stakeholders who are responsible for the success of a recycling program - Industry should have responsibility for all post-collection activities lest industry be forced to bear the majority of irresponsible spending - The program should include a de minimis level - The program should emphasize cost containment with regular review of operational controls; cost should remain within the cost bands seen in other Canadian jurisdictions - Does not align with introductory programs in other jurisdictions, such as ON and QC, which used a 50/50 shared responsibility model; this has the advantage of removing half the burden from municipalities, without unduly penalizing industry in the midst of economic hardship - Not the correct arrangement given the level of operational control retained by municipalities; industry, with limited control over program design is expected to bear 75% of the cost and risk, nor is it clear how efficient and effective programs will be recognized and funded - Would like to see the data supporting the particular cost division - Model will burden the municipalities and discourage participation; Failure to harmonize with other jurisdictions may increase operational costs (PROs) - Concerned that industry will have undue control over the program because they fund a larger share (PROs) - Funding split should be 50/50, if not then costs should be benchmarked against best practices in other North American jurisdictions. - Extremely important that a mechanism be put in place to ensure funding formula to reimburse municipalities reflects closely the cost of efficient and effective programs and that this is done in an open and fair manner. - As long as industry has a strong voice in determining the arrangement, then we are in favour of it. - Concern that despite industry contributing the majority of the funds, the MMRP will be overseen and quite likely over-regulated by government, which will likely result in unnecessary spending of the MMRP's budget. - If not 50/50 sharing, then benchmark costs against best practice (in North American recycling) not actual costs - Should use the 50:50 cost share model as in QC and ON, as this provides 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Why does the proposal not obligate industry for a higher portion of costs, as the impact on taxpayers will be compounded when they have to pay taxes on top of the purchase charge. - Transportation costs should be included for rural municipalities and those with populations of less than 25,000. - any shift to a user-pay model is welcome. - How would the 25% be allocated among municipalities? - Will the province compensate municipalities so they do not have to raise property taxes? Sales and/or income taxes should be the source of recycling funding, not property taxes. - The program should identify reimbursement on a cost per tonne per material basis, however should minimize differential rates of reimbursement within material categories - Should be a true EPR program with 100% industry funding; under this model, municipalities are still paying for 25% of recycled material and 100% of landfilled material - If industry bears the full cost, then there is an incentive to use environmentally friendly and cost efficient packaging - The fairness of the split depends on the total cost of the system, especially as there were some questions about the accuracy of the stated estimate of \$10 million - How will the 75% be amassed? Is it a lump sum for every recycled tonne, or a capped payment based on current recycling practice? 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Concerned that industry can offload costs to consumers. Industry should be required to pay from their profits; as the consumer is also a taxpayer, there is no shift in who bears the cost - Industry should pay more than 75% of the cost to municipalities who achieve the stated goals more cost-effectively. - Should be harmonization of shared responsibility model with other jurisdictions, e.g. Manitoba - Concern with industry control; given that consumers will be paying the costs, they should have a greater share of responsibility, such as through a Delegated Administrative Organization (DAO). Industry will simply try to minimize costs 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Concerned that the formula would not work in the North where communities are isolated and the tax base is minimal; there is no funding to cover additional programs - SK already has several full EPR programs, so there is no need to move away from this model - The program should also cover the costs of collecting and landfilling all material that is not recycled - Ensure that industry and government make the recycle business revenue neutral. All collected funds should go to the program and not to general revenue, as is the current practice. - Yes, however, the consumer will be responsible for most of that 25% through taxes and then will be taxed at the point of purchase as well, so we need to be careful. - The program should be funded by industry like all the other stewardship programs in the province - Municipalities bear the costs of material that is not recycled, and therefore still have a stake in full EPR programs, but the cost should fall on consumers not taxpayers

QUESTION 1: Under the preferred MMRP option, industry would fund 75% of the program while municipalities would cover 25%. Is this the correct arrangement?			
Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOs, Consumer Advocates & Public
<p>incentive for municipalities to efficiently manage recycling systems through equal accountability for system costs</p> <ul style="list-style-type: none"> - Cap administrative costs incurred by municipalities at percentage of overall costs - Supports the 75/25 cost sharing model proposed. Costs should be closely monitored and benchmarked against similar programs in Canada and the United States. - Municipalities should not have total choice in such things as "higher service level", if industry is expected to pay for it or for its "share" of it. 			

Table 7 Notable Responses to Question 2

QUESTION 2: Under the preferred MMRP option, the materials targeted include all residential packaging and printed papers except beverage containers. Are these the right materials?			
Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOS, Consumer Advocates & Public
<p>Notable Comments:</p> <ul style="list-style-type: none"> - Surprised at the exclusion of beverage containers, as they represent a large volume of waste. Should be included, unless they are otherwise handled - Support the exclusion of beverage containers, as SK already has the most efficient management system in NA- Reporting should be simplified, and categories aligned with other Cdn jurisdictions - Are plastics and styrofoam included?- SK should avoid the trap of including products like blank paper, unlike other jurisdictions - The program should not include materials already managed through other programs, e.g. paint containers and should be consistent with other jurisdictions- Beverage containers would be a valuable source of revenue that might offset the high net cost of other materials - Provide clarification on the "printed paper" definition. What products will it include? - The MMRP should provide for exemptions for packaging that does not go into the municipal waste stream, such as appliance packaging which is removed by the transport company. - Support the exclusion of IC&I material, as that is already handled through private contractors - Materials that are not processed or recycled should be exempt from the program until the infrastructure is in place to recycle them; in other jurisdictions, stewards are charged fees on all packaging they contribute to the waste stream, even if it is not recycled or processed in all jurisdictions. The MMRP should encourage consistent collection of materials throughout the province - Concerned about the long-term success of the program if it excludes IC&I, as it will not collect the majority of material and will set a precedent of two standards for stewardship programs (PROs) - Someone pays now for IC&I - not residents. It's either IC&I user fees or IC&I taxes. Municipalities should not be compensated because residents are not paying the tab. - Support the omission of beverage containers from the MMRP, at least for start-up, given the very high rate of return through the existing program. - If it can be accomplished economically, yes, it is a good start (with other forms of recyclable material possibly to be added in the future based on the successful implementation of Phase 1 of this program). - Is there consideration given to separating designated materials by percentage of recycled material and assessing a lower fee for high recycled content packaging to encourage companies to use them? - why focus on PPP instead of ICI? - support proposed approach, in particular the identification of "household" materials which are currently managed through municipal programs. - Support the inclusion of residential materials only. Consistent with similar programs in other provinces; IC&I waste stream generally paid for and managed by industry through agreements with private recycling haulers. - definition of PPP in the Regulation should be consistent with other provinces that have similar programs, such as Manitoba. - Paint containers should be excluded from the program: 1) Already managed through the SK Paint Stewardship Program (SPSP) and container stays with the paint; 2) Paint containers not managed through Blue Box in SK and if they were included, stewards would have to pay two sets of fees; 3) Other provinces have separate programs (PRO) 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - IC&I material should be included, as some municipalities cannot separate the streams, and consumers will be paying twice for IC&I material since it is not funded - The proposal seems to target materials for which there is an existing market, but materials suffering from a lack of markets, such as styrofoam, are a major concern - Should include HHW in this program- SARCAN does an excellent job recycling beverage containers, so no need to obligate those - Beverage, as well as chemical and oil, containers should be included; exclusion creates unnecessary duplication of programs - Ledger paper should be included, given the high percentage of home-based businesses in the province - The obligated materials must include ICI fibre in rural areas, where it comprises around 90% of paper-based packaging collected and processed; <ul style="list-style-type: none"> - 60% of the cardboard is commercial, and the program should cover this material - Will there be flexibility for municipalities to assess which materials they will collect, or will they be forced to collect all obligated materials? - How will the program determine where the material came from, particularly in a curbside system with supplemental depots that accept material from ICI and high-density housing? <ul style="list-style-type: none"> - For rural areas, separating residential recyclables from commercial materials is impossible. Why would we put together a program that ignores 90% of the waste? We would not have encountered the successes we have in the scrap tire and oil stewardship programs if we had designed them to include residential materials only. This program will be a failure if it includes only residential materials. - IC&I cardboard is the largest volume of material that we put through our plant. There are no private waste haulers offering this service in small communities. - If we are not compensated for ICI waste, we will only get compensated for 10% of what we recycle. That is a failure of this program for rural SK. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Concerned that collecting glass with paper will contaminate the paper stream, so MMRP should either exclude glass, which is difficult to handle and low-value, leaving it in the waste stream, or else contract out its collection and recycling to SARCAN where the infrastructure is already in place - Does residential packaging include styrofoam? - Will containers be provided? - Who will process and sort the paper and glass if it is disposed in the same container? - Restricting curbside recycling to large communities discriminates against rural SK. - Beverage containers should be obligated - The inclusion of IC&I would help finance collection from these sources, which is currently diminishing due to the imposition of recycling fees on IC&I customers 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - The materials seem appropriate but the IC&I stream should be included; excluding it would be a major lost opportunity - IC&I material should be included, as no municipalities are able to distinguish by source and it contributes a significant proportion to total waste - May be desirable to include batteries in the North as most of these are going to landfill - Yes, but I would still like to see beverage containers included. - define materials as broadly as possible to avoid confusion - Are textiles included? - Is boxboard considered cardboard? - How is printed paper defined?

Table 8 Notable Responses to Question 3

QUESTION 3: Under the preferred MMRP option, municipalities remain in control of decisions regarding program features (collection type & frequency, container type, etc). The funding formula to reimburse municipalities would reflect the cost of efficient and effective programs. Is this the correct arrangement?

Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOS, Consumer Advocates & Public
<p>Notable Comments:</p> <ul style="list-style-type: none"> - This will force municipalities to pursue efficiencies, as it doesn't make sense for funding to treat all processes equally - Funding should be the same in each municipality - Hope that the cost of collection is taken into account, particularly in rural areas - Should be some type of deposit system to encourage collection - Accounting for effectiveness and efficiency is integral to the success of this program, as it encourages municipal and consumer responsibility - Stakeholders should be offered the opportunity to comment on the funding formula - Seems reasonable, but may not work in practice - Industry should be responsible for post-collection; municipalities should be 100% financially responsible for their operational decisions - Cost containment is important; industry should not pay for inefficient and ineffective programs - Support this policy as long as SK doesn't adopt full EPR - Operational decisions should be made by joint committee composed of industry and government - Unfair that industry asked to bear cost, while municipalities retain in control of program features - Funding should be proportional to the level of service offered by the municipality - Service delivery must include the private sector to ensure effective and efficient service, given that municipally-funded programs are three times more expensive than contracted programs. - Municipalities should be encouraged to set up programs that are uniform to help consumers and business know what to expect 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Will lower costs result in a greater proportion of total costs being covered? - The regulation should include the wording "all municipalities urban and rural" - Seems fair, as there is a need to recognize that good services are offered outside the regional WMAs - If municipalities accept IC&I, will they be reimbursed? - Concerned with possible caps on reimbursement based on population. Not in favour of the cap on cardboard reimbursement - Difficult to comment without more detail - Municipalities who cannot afford recycling will not have a program but will have to pay for one - Criteria for efficiency and effectiveness must be based on SK factors, and not imported from another jurisdiction - Municipalities and regions are the best ones to judge the most effective and efficient methods of collection - Strongly believe that municipalities should maintain control of service delivery and determine the levels of service for recycling. - What will the municipality's responsibilities be, with respect to: high-density housing; service design/delivery requirements; participation?; Municipality's ability to design a comprehensive waste management plan is contingent upon responses to these questions. - The Ministry must clarify the objectives of the MMRP, before efficiency and effectiveness can be assessed 	<p>Notable Comments:</p> <ul style="list-style-type: none"> -Municipalities should have full autonomy over their recycling programs and the funding formula should be fair and equitable to all communities - do not support the SRO having authority to circumvent municipal control of recycling programs and sub-contract out operations. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - More detailed consultation is required, specifically in the North, few communities have the resources or infrastructure to collect store and transport material; - Curbside programs are much more successful in achieving high participation rates by citizens. Although having one single consistent program across the province is desirable, there are logistical challenges. Support having guidelines for rural and urban programs.

Table 9 Notable Responses to Question 4

<p>QUESTION 4: Under the preferred MMRP option, the program would be governed by the Board of Directors of a Stewardship Responsibility Organization (SRO) made up of Industry representatives. An Advisory Committee consisting of Municipalities, Industry, an Environmental Non-government Organization (ENGO), and the Government of Saskatchewan (observer) would consider and provide direction on important decisions such as funding changes. The Advisory Committee would provide overall recommendations on the program directly to the SRO Board. Is this the right governance model?</p>			
<p>Industry & Industry Associations</p>	<p>Municipalities & Regional WMAs</p>	<p>Service Providers (Haulers & Recyclers)</p>	<p>ENGOs, Consumer Advocates & Public</p>
<p>Notable Comments:</p> <ul style="list-style-type: none"> - SRO Board Should include equal representation for other stakeholders; this will also head off allegations of corruption - "Industry" should be clearly defined as those companies obligated to report and pay fees - The advisory committee is not a good body for proper governance and should not be in a position to provide direction on key policy and operating decisions - Annual public consultations are sufficient - Support an industry-governed SRO Board, in order to ensure sufficient flexibility to deliver efficient and effective programs - Appropriate that the SRO governs the program, given that stakeholders fund the majority of the program - The governance function of the SRO is unclear; how will board members be appointed? the Board should include reps from different sizes and sectors of business? - How is the advisory committee constituted? Who will draft the Regulation and will the SRO get a chance to comment before it goes forward? - The Advisory Committee's role needs to be clearly and carefully defined as an advisory role and not a directing role which would imply control and a vote - Representation must be broad; the Retail Council of Canada should be included, if not already - The SRO should have one municipal representative for every three industry representatives - Exact governance function unclear. It is appropriate that the IFO/SRO board consist of affected industry stakeholders, but how are they appointed? An open, transparent process is required, equalizing the representation amongst different sectors and sizes of businesses. - How is the Advisory Committee constituted and what influence will it have? Will it provide input on the draft Regulation? - SRO should have the chance to comment on the draft Reg. before it moves forward. - Perhaps it is, so long as industry's voice is the one with most weight in terms of who will provide these services. - Yes, as long as administrative costs are kept to a very minimum. - Support industry-only SRO and multi-staholder Advisory Committee. - Support industry-led stewardship programs and agree that the governance structure of the SRO should be limited to industry stewards. This approach is consistent with similar programs in other provinces. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Too many levels; the Advisory committee is the most appropriate governing body, and does not have sufficient influence at a Board level - Both rural and urban municipalities should be represented - The SRO Board include reps from all stakeholders. The Advisory Committee should be composed of industry, with one rep on the SRO Board, as Industry is only responsible for collecting funds, not actually recycling - The Board representation should be determined proportionately to the funding responsibility, as industry has a conflict of interest when it comes to funding - The advisory committee should include a municipal waste management technical expert - Who is responsible for determining which materials are obligated? - The Ministry must clarify the relationship between the SRO and the advisory committee and whether the governance structure will allow the establishment of technical sub-committees. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - The program should be governed through an equal balance of industry, government (both provincial and municipal), and the public - Government needs to clearly define the expectations and obligations of the advisory committee, on which municipalities and industry should have equal representation - Despite industry's function as the funding source, they should not dominate the advisory committee; representation from a broad spectrum of stakeholders is crucial to ensuring environmental and social targets are met - SARCAN should be involved with any product stewardship program in the province, as they have a strong recycling reputation - Industry participation must be mandatory and municipal participation should be strongly encouraged; the program should be operated by a Delegated Administrative Organization that is not dominated by either industry or municipal governments - Concern pertaining to long-term sustainability of the program and how it unfolds. Two primary powers at the table are municipal and industry; their roles and goals will evolve into a conflict. - Advisory Committee needs to become a delegated administrative organization with a higher preponderance of representation from the public to ensure check and balance and maximization of materials diverted as the goal of the program 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Municipalities deserve influence in program governance, given that they bear a substantial portion of the costs, as well as full costs for material that ends up in landfill - Municipalities should be represented on the Board as they are directly operating the program, and therefore should be included in the highest level of decision making - Two levels of governance seems like needless bureaucracy - The Northern municipalities appear to have no input on the decisions that affect them - Board of Directors of the SRO should never just include industry representatives. Advisory committees do not have enough clout for the board to make change. - Representation of the Advisory Committee should be the same on the board of the SRO.

Table 10 Notable Responses to Question 5

QUESTION 5: Under the preferred MMRP option, the obligated parties would be (in order of precedence): resident Brand Owner, First Importer into Saskatchewan, or Voluntary Steward. Is this the right approach?			
Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOS, Consumer Advocates & Public
<p>Notable Comments:</p> <ul style="list-style-type: none"> - Recommend establishment of <i>de minimis</i> provision to avoid wasted time and money; for small businesses, the imposition of fees and reporting requirements would be an unbearable burden - Agree that the brand owner should fund the program - the nature of the "Obligation" must be clearly defined: to report or to pay fees? Brand owners/first importers should report while municipalities and brand owners/first importers should fund the program - Voluntary stewards are essential in a province with fewer businesses that have a physical presence in the province, as it would allow out of province brand owners to take responsibility for PPP supplied into SK - Consistency across jurisdictions is important, so should align with Stewardship Ontario, as they have experienced all the issues - There should be an option for any obligated parties to remit payment and sales numbers on behalf of any other obligated parties - All stewards who contribute PPP to the waste system should be obligated without exception - This appears to be harmonized with other jurisdictions and is therefore reasonable - The determination of these parties must be clearly defined so all are on the same page with respect to the funding and who's responsible for what - Concur with the hierarchy. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - How are 'resident brand owners' and 'voluntary stewards' defined? It sounds like there is a potential for certain products accruing multiple fees. How will these be tracked and will extra money go to municipalities who do the recycling? - Could encourage large companies to move headquarters out of SK, if only companies that reside in SK are obligated. - Simpler to obligate either the creator or the vendor of the product - Agree that the producer should bear the costs, which might encourage use of more easily recycled materials - All PPP should be obligated, but where does the line between primary and secondary packaging lie? - What is a voluntary steward? - A voluntary steward program will not work; the obligated party must be someone handling the packaging prior to or at a point of sale. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - The precedence is correct, but industry should not be allowed to pass on the costs, as in the electronics program, as they are then not accountable - Who will administer the money that comes in? - If municipalities are receiving funding shouldn't they be obligated to participate in program from its inception? - Municipalities should be obligated, and penalized if they join the program at a later date 	

Table 11 Notable Responses to Question 6

<p>QUESTION 6: Under the preferred MMRP option, each municipality with a population of 25,000 and over would receive funding for a curbside collection program, while smaller municipalities would receive funding to operate depot-based programs. Municipalities would nonetheless have the choice of providing a higher level of service, provided they were willing to pay the incremental costs. Is this the right approach?</p>			
<p>Industry & Industry Associations</p>	<p>Municipalities & Regional WMAs</p>	<p>Service Providers (Haulers & Recyclers)</p>	<p>ENGOs, Consumer Advocates & Public</p>
<p>Notable Comments:</p> <ul style="list-style-type: none"> - Support the approach, as there has to be accountability and responsibility; cities may continue to charge tax payers a nominal fee if the program does not fund a particular service - Should be funded based on volume of material they collect and recycle, not on how they offer services - Prefer a functional split that would give industry control over post-collection - Should capitalize on Ontario's experience - Prescriptive general rules may come back to haunt the program; recommend an option for providing alternate service to curbside in large communities where the circumstances warrant - Joint committee should make the decisions based on a cost/benefit analysis and review by stakeholders - Must clearly define "appropriate level" of recycling service and an "efficient and effective recycling program" as these define services funded by the Program and the incremental services funded by the municipalities. As industry will be expected to 75% of program costs industry should be given a significant role in defining these terms. - Seems reasonable as smaller municipalities do not have the economies of scale for curbside - Municipal funding should match municipality's ability to provide service; putting in place cost controls will keep steward costs in line - Yes, providing industry's voice is heard, and continues to be heard in the long-term, in order for this to be a practical, efficient and affordable program. - Industry as a whole - not just industry representatives on the Steering Committee - should be able to provide input on the Draft Regulation. - There is no indication of how industry will be involved in Regulatory Development or Program Plan Development. Request a revised and inclusive consultation process, with adequate time for industry consultation to provide constructive and substantive input. - Selection of Advisory Committee members should be open and balanced process. CCSPA is concerned that a few industry groups are making decisions that affect many other associations who do not have representation. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Will MMRP reimburse municipalities fully for providing these services? Otherwise, the plan only works for larger municipalities - Why was the cutoff set at 25,000, instead of 10,000; there was no justification provided - Even if smaller municipalities bear the incremental cost of higher service levels, a depot is still required - The funding level is discriminatory to small municipalities; prefer a funding method that covers curbside for all communities, and provides an amount per person that is inversely related to the size of the municipality - Larger municipalities should have the option to not offer curbside, given the cost - How would regional authorities receive funding if their core municipalities implemented curbside, while the rest of the region remained on a depot system? - Disposal fees and transport costs are stumbling blocks for recycling programs operated over large geographic distances - Larger municipalities (> 25,000) are best served through a combination of curbside and depot; how will this be funded? - How will beverage containers be considered with respect to service delivery, given that the municipality will have to meet public expectations of the program? - The MMRP should be results-oriented and not seek to prescribe collection methods for municipalities - Is the population threshold a way of setting different diversion targets for cities and towns? 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Do not support mandatory curbside programs for communities over 25,000 as this will increase the net costs of the system - Would MMRP support the higher net cost of recycling for curbside in smaller programs? Suggest grouping municipalities in three groups according to population: Group 1, >25000, optional curbside and compulsory ICI segregation; Group 2, >5500, optional curbside and compulsory ICI segregation; Group 3, <5500, depot drop-off, no ICI segregation - The municipality should be allocated funds contingent on size and then should have full autonomy to spend the money on its recycling program as it sees fit; the current proposal is unfair to smaller municipalities - Strongly disagree with not funding curbside programs in smaller communities at the same level, as depot programs experience much higher levels of contamination - Estimate that ICI material is 75% to 80% of depots' material; because of the volume, this drives up transportation cost to the communities - Rural communities should not be penalized and accorded lower funding for preferred services; funding should be available equally regardless of population - Smaller municipalities currently operating curbside programs should receive full funding and be grandfathered out - Larger municipalities should have the option of supplementing curbside programs with depot systems, which should be eligible for funding - SARCAN should be represented on the Advisory Committee to ensure program by-in by all citizens. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - No discussion about what type of communities this program will include: Northern? Small municipalities? - Disagree with the prescriptive approach the proposal has adopted; should be results-oriented - Only 4 SK municipalities have a population over 25,000 people; a threshold of 5000 is more reasonable - Serious doubts about the feasibility of collection and transportation for smaller communities - Yes, as long as all stakeholders are represented.

Table 12 Notable Responses to Question 7

<p>QUESTION 7: According to the tentative timeline that has been presented, the MMRP Program Plan would be approved by the Minister of Environment by January 2011, and, assuming this plan is approved, the program would commence on June 1, 2011. Are these the right timelines?</p>			
<p>Industry & Industry Associations</p>	<p>Municipalities & Regional WMAs</p>	<p>Service Providers (Haulers & Recyclers)</p>	<p>ENGOS, Consumer Advocates & Public</p>
<p>Notable Comments:</p> <ul style="list-style-type: none"> - The program has been long in coming and its current timing, economically and environmentally is very good - The time period between public identification of the material categories and reporting deadline will be crucial to compliance efforts, particularly if those categories are not aligned with other jurisdictions, as the information will have to be collected, which may lead to delays in filing, as in Manitoba - The sooner the better, lest government fail to implement it - Sufficient time for consultation and comment must be provided for, as experience suggests that timelines between draft plans and comment periods have been too short for effective and educated comment - Implementation should be at least 6 months after approval, and preferably 12, particularly as experience suggests plans often take longer to get approved - The 6-month timeline should be extended to 8 months - Current deadline for comments has not provided enough time for all stakeholders to respond - Extremely aggressive timelines; sufficient time should be allowed to develop a reasonable and equitable plan, particularly as industry has experienced negative effects from hastily developed programs in other jurisdictions - In other jurisdictions, SROs are given more time to develop plans - at a minimum it takes 6 months to develop the plan and then a further 6 to implement it, with time in between for public consultation and government approval; the proposed timelines are unrealistic and must be reconsidered to allow for proper plan development and implementation - Hastily moving forward without a plan for end markets of the recycled materials will create problems; a successful plan must identify markets for the recyclables and commit reasonable funds to operate the program - Mechanisms to encourage partnerships between municipalities and the private sector needs to be in place. Having the private sector provide these services will allow for a free market system with competitive costs and services. - Mechanisms also required to ensure municipalities are operating on an inclusive basis; meaning that there are no opting in or opting out privileges – the program would be universal to everyone in the municipality. - support, however should a municipality with a population > 25,000 not have the capabilities to offer this level of service and implement container depots instead, funding provided should be in line with this decreased level of service. Similarly, should a municipality with < 25,000 population choose to offer an enhanced level of service, it should be responsible for the incremental cost to implement the program. - Support this approach - In lower population density areas, there are limits to cost-effective service. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Too many problems with the proposals to implement along this timeline; the province needs to re-assess and simplify, and completely remove funding responsibility from the municipal property tax base - The timeline is too aggressive and will generate errors that will require correction later - The legislation should leave room for corrections without the requirement for legislative approval - Aggressive, but may be manageable; however, should not force the issue without public backing - The consultation windows are very small; and should be extended to allow proper time for consultation and feedback - The sooner the program is implemented the better - The timeline is appropriate, given that this plan has been considered for over seven years, but it may not be feasible if some of the concerns are seriously addressed - Will information on the funding model be available by December 2010? - Concerned that the Ministry has already decided upon a course of action and is just looking for 'confirmation' from stakeholders; stakeholders should be truly consulted and their input reflected - Depends on the scale of municipal resources required: if the municipality is required to roll out a brand new collection system, then the timelines are too ambitious, if demands on municipal resources are limited, then it is acceptable 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - If it's a government priority, then the deadline is appropriate; Strict deadlines are a reality of business - Very aggressive, but acceptable if the deadlines can be met - The timelines are reasonable - The timelines are so tight it seems like the committee is presenting a 'fait accompli' and not seeking oversight or consultation - Although the timelines are tight, they are achievable, as industry has experience from other jurisdictions 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - May be too rushed for a practical program to be implemented and for communities to prepare and purchase necessary equipment.

Table 13 Notable Responses to Question 8

QUESTION 8: Under the current proposal, a Joint Advisory Committee is tasked with overseeing the consultation process and advising the Ministry of Environment and Stewardship Responsibility Organization. Is this the correct oversight approach?

Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOs, Consumer Advocates & Public
<p>Notable Comments:</p> <ul style="list-style-type: none"> - Should clearly define "Industry" as those companies obligated to report and pay fees - Would appreciate more transparency on membership of the committee and better communication to all affected stakeholders on progress to date - Should be based on the governance model of established waste diversion programs - Will work as long as industry and municipalities are represented and have input - Support the advisory committee, but it should not undermine the authority of the SRO - The composition of the committee should reflect the proposed 75/25 industry/municipality funding split - How is the advisory committee constituted? Will it have input on the draft regulation? - Yes, providing industry's voice is heard, and continues to be heard in the long-term, in order for this to be a practical, efficient and affordable program. - Industry as a whole - not just industry representatives on the Steering Committee - should be able to provide input on the Draft Regulation. - There is no indication of how industry will be involved in Regulatory Development or Program Plan Development. Request a revised and inclusive consultation process, with adequate time for industry consultation to provide constructive and substantive input. - Selection of Advisory Committee members should be open and balanced process. CCSPA is concerned that a few industry groups are making decisions that affect many other associations who do not have representation. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Reiterate concern with composition of SRO Board - The exclusion of SARC/SARCAN is understandable as they are contractors to the municipalities and do not have a direct vested interest in the program - Understand that the Ministry would retain policy direction and believe that it should retain oversight of the consultation process as well - Future communications must be distributed to all consultation attendees - The advisory committee's recommendations should have weight in the ultimate direction of the plan 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - The consultation process up to this point has offered few opportunities for input; more consultation on the regulation and program plan would be welcome - The program needs enhanced oversight, to focus on goals and protection of the public's interest - Care should be taken to promote fairness to all stakeholders and avoid bias in any direction - Lack of concrete answers to all the questions at the consultation highlight the need for better communication from the advisory committee - Disappointed that this was the first opportunity to provide input on MMRP development - SARCAN should be represented on the Advisory Committee to ensure program by-in by all citizens. 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Appropriate as long as Northern municipalities are represented in the consultation process - Yes, as long as all stakeholders are represented.

Table 14 Other Comments

QUESTION 9: Please share with us any other comments you wish to provide.			
Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOS, Consumer Advocates & Public
<p>Notable Comments:</p> <ul style="list-style-type: none"> - Consider devising a national calculator to accurately allocate sales to provinces, as the proliferation of separate waste diversion programs combined with the increasing centralization of distribution centres is making it very difficult to calculate sales to a specific province - <i>A de minimis</i> threshold is important, as it will reduce the administrative burden on the SRO and will exempt small business owners without the knowledge or resources to effectively report. - Will voluntary stewards be able to register and pay a minimum fixed fee without having to file reports? - Stewards should be rewarded, not penalized, for adopting environmentally-friendly packaging - Need to clarify how the reporting and payment will work, particularly if the program will start mid-year - Was not able to access the net meeting, even though computer tested out fine - Look forward to further consultation as the plan is developed - Actions need to be taken immediately to restrict the cost of collecting recyclables, which far exceed the revenue from marketing those materials - The program, including material definitions, should be aligned with those in other jurisdictions in order to reduce administrative inaccuracy in tracking and reporting material sales - Will the program be responsible for repaying government bridge financing? The costs are incurred prior to the legislation and should not be repaid - The proposed 60% target rate is too high; first-year's performance should be monitored and then a reasonable target determined, as targets must be realistic and achievable, which involves accounting for collection, processing and recycling capacity and understanding end markets - Will all deposit beverage containers be excluded from the program, or only those actually recovered by SARCAN? As 14% are not collected, will their brand owners or SARCAN be obligated to contribute to MMRP? - Materials should only be included if there is a demonstrated need to justify further action - Should follow SARCAN's collection model and should work closely with them to use their expertise - The reporting format should be standardized for all municipalities - Support the option of placing a visible fee on products at the point of sale - Stewards should be able to opt out of the program if they are able to establish their own PPP recovery system, as some industries have been exploring the possibility of establishing a closed loop system in recent years, and should be given the opportunity to self-manage their product, as in other jurisdictions - Consumer participation is critical, and all levels of government must commit to awareness and communication efforts to affect consumer behaviour - strongly encourage the MoE to apply the same Results-Based approach to establish the MMRP that was used to create existing stewardship programs. (PROs) - When developing the Rules for Stewards, consider a cutoff date for Steward registration that is at least 3 weeks before the filing deadline. In another province, retailers received registration details from their suppliers after the filing deadlines, causing grief and double payment. - The \$10 M cost estimate for the program is questionable given the following points: 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Support the concept of a unified recycling program, but there are too many programs and tariffs in place right now to effectively support provincial recycling. This program should address that. - Will the program include incentives to reduce packaging or use eco-friendly packaging? - Is SARCAN fully prepared to participate? - Should not have to expend capital in order to receive funds - The exclusion of ICI material is a deal-breaker for regional waste programs - A fair distribution of funding is essential to the success of the program - Concerned that the estimated total cost of the program is understated - The MMRP must explore alternative options for recycling in remote communities throughout SK, as these are often unable to sustain a program due to high transport costs - The MMRP should include technical and financial support for small municipalities to start programs 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - SARC members offer extended recycling programs to communities that may or may not be part of a region. Do these members need separate funding from each community or will they receive it directly from the SRO? Will regions be given special status for payments from the SRO? - The estimated \$9.5 million cost of the program is grossly understated; no justification was provided and based on Manitoba and Ontario costs, the estimated cost should exceed \$20 million - SK recycling grew in an organic manner responsive to local conditions; a strong strain of volunteerism is responsible for the success of the beverage deposit recycling system; the MoE and the MoSS should have a veto over any move away from recycling currently carried out by a SARC member - What is the marginal cost per tonne for an increase in recycling? Currently it is \$8/tonne, but based on a study exploring a curbside program in Saskatoon, it would cost \$1600/tonne to recycle an extra 5000 tonnes; given this, the government should not overhaul the current collection system, but should focus on enhanced recycling 	<p>Notable Comments:</p> <ul style="list-style-type: none"> - Where did the estimate of program cost come from? Saskatoon's curbside program alone costs \$8 million, which suggests the estimated cost is grossly understated - Do not need to justify the necessity of such a program by the bad economic climate; recycling programs in SK struggle at the best of times - The program needs to have clearly stated goals and objectives - Approximately 40,000 people are spread across the North over 45% of the provincial landmass. This program does not adequately take account of the experiences of the 34 communities and numerous first nations' bands that these figures represent. Many communities share services with First Nations bands and the proposal does not address them - There is little commercial activity in the North, and therefore the cap on cardboard at 10% of total recyclable material is not appropriate

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<p>the net cost to operate the PPP stewardship program in Ontario (13 million people) in 2008 was \$168 M; unlike the ON program, the SK program will not include PET and aluminum containers, materials that generate the highest revenues on the recyclable commodities markets; the extra freight cost that will be incurred in SK due to the large distances to markets; the recent study that determined the cost of putting a curbside system in Saskatoon would be \$8M; and assuming the same cost for Regina; and \$4 M for Prince Albert and \$4 M for Moosejaw.</p> <ul style="list-style-type: none"> - Industry will request from vendors they become voluntary stewards. Based on the challenges in Manitoba, there needs to be sufficient time between program plan approval and the timeline that the stewards have to register voluntary. - The public would not be receptive to paying more environmental fees when they are already paying for beverage containers. The cost of the new system (\$10 M) excludes SARCAN. SARCAN is receiving \$17 M annually in EHF for beverage containers. If the systems could be consolidated that money would go a long way in financing the MMRP. - In the interest of efficiency, strongly support any initiatives that seek to eventually have just one national stewardship program/system across the country. All significant program details should be harmonized across the province. - Request that a deminimis clause be put in the Draft Regulation (as is the case in Ontario). Request for an opportunity to discuss this issue with you at your earliest possible convenience. - Strongly feels that government spending, although a necessity, can be accomplished more efficiently when combined with private sector expertise. This program is perfect opportunity to advance Saskatchewan's recycling significantly, in an efficient, cost-effective manner. There are private-sector companies already providing varying levels of recycling programs. They already have the expertise, infrastructure, programs, services and, most importantly, significant capacity to do more. - Implement the exact same system as Manitoba (MMSM), thus allowing for streamlined reporting of blue box materials - Share recycling sites with other programs/provinces, thus maximizing existing infrastructure that may exist in SK or neighbouring provinces - Provide stewards with the option of developing individual waste diversion plan or joining materials management scheme. - Imperative that fee setting be related to how a particular material type is treated within the recycling system - Residents must have equal access to recycling programs for designated materials for which funding is being provided. - In-kind contributions should not be considered as they have been in other jurisdictions. - Program plan should allow for voluntary stewards to provide opportunity for out-of-province brand owners to take responsibility for the PPP they supply into Saskatchewan. This allowance is very important to Saskatchewan retailers. - all partners (Provincial government, Municipalities, and Industry Stewards) must work together to raise consumer awareness of the MMRP and the benefits of participating in the program. - MOE has outlined a target recovery rate of 60 per cent or higher. Targets should not be set until the MMRP fully understands the recycling capacity that exists in the province and until a thorough analysis of the MMRP's first year of operations is completed. - Please directly involve CCSPA in all future waste diversion and recycling discussions 			

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Industry & Industry Associations	Municipalities & Regional WMAs	Service Providers (Haulers & Recyclers)	ENGOS, Consumer Advocates & Public
<p>in Saskatchewan related to consumer and industrial products and packaging</p> <ul style="list-style-type: none"> - Request that SK back up any proposed regulation with a cost/benefit analysis. This has been absent in other provinces, notably Ontario, where speed to implementation has been the prime goal; and quality of information was compromised. - Harmonization to the extent possible and reasonable with other provinces (e.g. definition of products, packaging and steward) - Flexibility for visible or non-visible fees - Competitive bids in hiring consultants to help develop and manage the MMRP. - Should implement the exact same system as Manitoba and consider having both programs report through a shared portal - Should consider sharing recycling sites with other programs/provinces in order to maximize use of existing infrastructure. 			