

# What We Heard – 2021 Engagement Results

*The Household Packaging and Paper Stewardship Program  
Regulations and Multi-Material Recycling Program*

November 2021

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## Introduction

### Why we consulted

The Government of Saskatchewan is undertaking research and engagement to inform potential changes to *The Household Packaging and Paper Stewardship Program Regulations* (the regulations) and Multi-Material Recycling Program. The regulations for waste packaging and paper came into effect in February 2013. The regulations require businesses that supply or distribute packaging and paper to Saskatchewan households, referred to as stewards, to operate a product stewardship program for materials designated in the regulations. This includes packaging made from metal, paper, glass, plastic or any combination of those materials, as well as paper, including items such as flyers, brochures, newspapers and magazines. In January 2016, the Multi-Material Recycling Program was launched by Multi-Material Stewardship Western (MMSW), a not-for-profit organization that acts on behalf of businesses obligated to participate in the program.

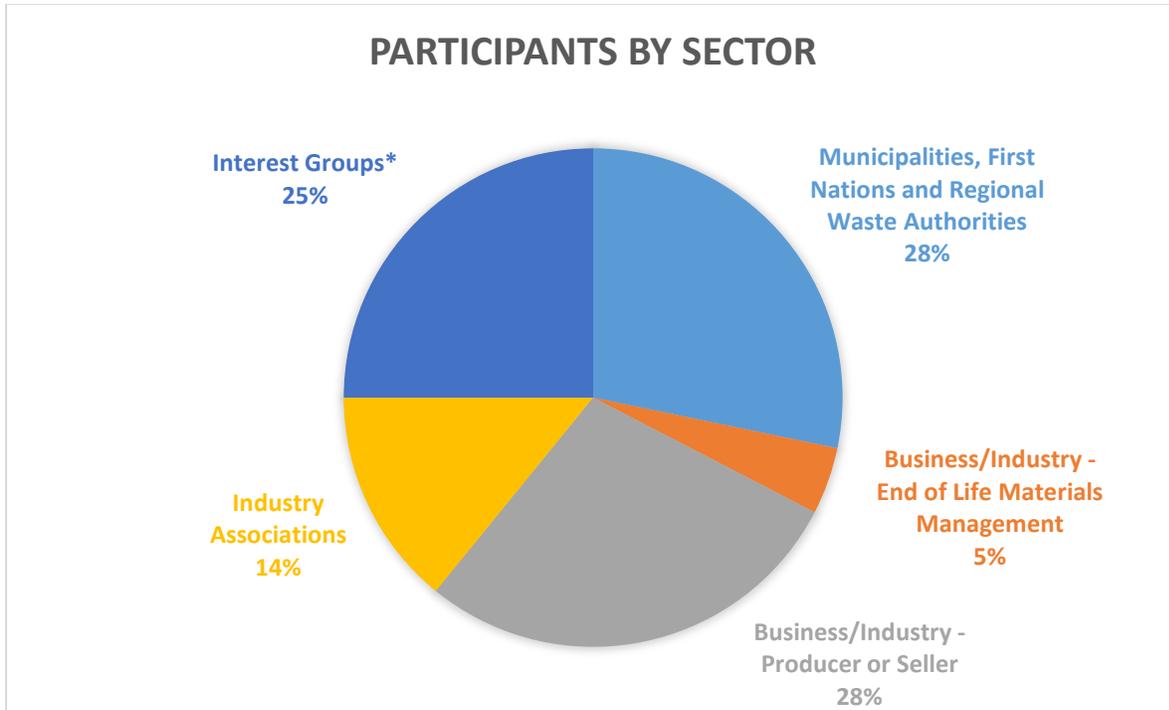
A regulatory and program review are needed for several reasons, including evolving waste streams, global market changes, challenges for individuals, businesses and municipalities, and the government's commitments to provincial and federal waste reduction strategies. To reduce waste, protect our environment and support the Canadian Council of Ministers of the Environment's (CCME) strategies and action plans, the Ministry of Environment released Saskatchewan's Solid Waste Management Strategy in January 2020 as a framework for sustainable waste management in the province. Saskatchewan has also committed to working towards goals outlined in the CCME Canada-wide Action Plan for Extended Producer Responsibility (EPR), Canada-wide Strategy for Sustainable Packaging, and Canada-wide Strategy on Zero Plastic Waste and Action Plans. The regulatory and program review will allow the province to build on progress that has been made through the Multi-Material Recycling Program and consider solutions that are aligned with the CCME Strategy on Zero Plastic Waste and Saskatchewan's Solid Waste Management Strategy.

### How we consulted

In spring 2021, the ministry discussed the details and key issues of the regulations and program with stakeholders, as well as specific areas under consideration for potential changes. These areas included: transitioning to a full EPR program, exemptions for business, program costs and funding, recovery rates and performance targets, designated materials, non-residential waste, regulatory red tape and any other areas that were brought forward. To facilitate engagement, the ministry released a discussion paper and online surveys on March 2, delivered virtual engagement sessions on March 30 and April 15, hosted online meetings throughout the spring and accepted written and survey responses. The initial deadline for written and survey responses was April 30, but the deadline was extended to May 10.

## Who participated

A total of 92 participants provided feedback during engagement. To help provide context, participants are broken down by the sector they represent (Figure 1).



\* Interest Groups include environmental non-profit organizations, stewardship and producer responsibility organizations, academics and researchers, government and the general public.

## What we heard

### Full Extended Producer Responsibility

During engagement, the ministry asked for feedback about the opportunities or challenges associated with shifting towards a full EPR program, what factors need to be taken into consideration, and what elements of EPR need to be specific to Saskatchewan and consistent across Canada.

### Industry and Stewards

- Many stewards supported the transition to a 100 per cent producer-funded residential recycling program for packaging and paper, provided they are also given full responsibility for the operations of the program, including program design; promotion and education; selecting service providers; and collection, processing and marketing of designated materials. Some stewards expressed concern that a full EPR program would increase internal costs and administrative red tape for businesses, resulting in additional costs to consumers. However, other stewards noted that a transition to full EPR could reduce regulatory red tape, if regulatory requirements were harmonized with other jurisdictions.

- Several advocated for a phased-in approach that would allow the program to transition to full EPR over multiple years. A gradual transition over a reasonable timeline would provide cost-predictability for producers, prevent service disruptions for residents and allow municipalities to transition staff to new roles, if necessary.
- Some commented that if operational responsibilities of the program shift to industry, producers would have access to relevant performance data that could result in improved program outcomes. A full EPR program would enable industry to recover materials and increase recycled content in products and packaging, which is critical to achieving a circular economy.
- Stewards emphasized that a transition to full EPR should focus on maintaining existing service levels or increasing service levels for municipalities before considering an expansion of the program scope, such as including additional designated materials (e.g. packaging like-products or single-use products). The regulations should allow for additional packaging materials and potential targets to be slowly increased over time, as this represents significant cost increases for producers.

### Municipalities and Waste Collectors

- Municipalities are generally supportive of shifting to a full EPR program, expressing that a full EPR program would remove financial and administrative burdens and end market uncertainties for materials, while standardizing the materials collected in each community and leading to more consistent recycling services across Saskatchewan. However, some municipalities and regional waste management authorities are concerned about giving up operational control of their programs and want to retain control of collection, sorting and shipping of designated materials.
- Many municipalities said that a full EPR program should create a more equitable service for all Saskatchewan residents and standardize communication and education across the province. Additionally, municipalities would no longer be responsible for finding buyers for hard-to-recycle packaging. Industry could use economies of scale and find solutions on a provincial basis for designated materials.
- Some municipalities and waste collectors expressed concern that in a full EPR model, industry may move operational contracts to large, low-cost recycling contractors, impacting local businesses or non-profit organizations currently used for collecting and/or sorting materials, resulting in a loss of the economic and social benefit they provide to Saskatchewan residents. Municipalities request that existing contracts, assets and partnerships be considered if the program shifts to full EPR, as many municipalities have multi-year contracts with contractors.
- Municipalities would like to see a recycling program that continues to improve waste diversion and resident satisfaction, maintains or improves service levels, and includes multi-family housing units. Some municipalities requested access to recycling/diversion data from the program within their municipal boundaries.
- Numerous stakeholders recommended that the government ensure appropriate time and opportunities for consultation on draft regulations and that producer responsibility organizations engage municipalities in the development of the program plan.

## Business Exemptions

During engagement, the ministry asked if exemptions or alternatives should be available to businesses and what criteria/thresholds should be considered when determining if a business qualifies.

Feedback on business exemptions varied throughout engagement. While some stakeholders support continuing the current exemptions to reduce costs and administrative burden for small businesses, others do not support exemptions of any kind and believe it is important that every business be held accountable and proportional to the amount of waste they generate. Without a regulatory obligation, exempt businesses are not incentivized to change suppliers or redesign their packaging for better environmental performance.

Support for each of the exemptions also varied. Several stakeholders believe the government should remove the single point-of-retail exemption, as the number of retail locations is irrelevant to the impact of a business on the environment or its ability to pay to manage its materials. A single, large retailer could supply a considerable amount of packaging and paper into the market.

Several stakeholders recommend Saskatchewan lower its revenue threshold from \$2 million to \$1 million, harmonizing more closely with other western jurisdictions (e.g. British Columbia's threshold is \$1 million and Manitoba's is \$750,000). Lowering the threshold would capture more businesses, without placing an undue burden on the smallest businesses. Some stakeholders said that removing all revenue exemptions would increase costs and labour related to compliance enforcement, without providing proportionate benefit to the program.

While some stakeholders think the one-tonne exemption should be removed from the regulations and all businesses should have to participate equally, many believe it should continue, as the amount of waste produced from these businesses would have little environmental or fiscal impact on the program compared to the administrative burden it would create. However, during engagement, an example was provided for consideration. As packaging trends move toward more lightweight materials, the volume of one tonne of packaging waste changes over time. One tonne of plastic packaging may be equal to thousands of pieces of plastic that require additional time and labour to individually sort.

## Level Playing Field

During engagement, the ministry also asked what steps the government could take to ensure a level playing field among all producers. Suggestions to bring exempt businesses into the program, but not add a high administrative burden, include utilizing a flat or fixed fee for small generators, simplified program registration and limited reporting requirements. Currently, the program uses flat fees for stewards who supply between one and five tonnes of packaging and paper into the market.

Several stakeholders provided feedback that regulatory compliance and enforcement is integral to creating a level playing field among businesses and reducing free riders who could compromise the integrity of the program. Stewards recommend that the ministry resolve any issues with non-compliant businesses prior to transitioning to a full EPR program. Some stewards suggest removing the single point-of-retail sale exemption to help ensure a level playing field and potentially address the challenge presented by e-commerce businesses. Several stewards suggested providing a strong definition of a steward using a hierarchy like the one in Ontario's *Blue Box Regulation*, which would help to include e-commerce businesses and online marketplaces that sell into Saskatchewan.

## Program Costs and Funding

### Municipalities

During engagement, the ministry asked municipalities if the program is helping divert designated materials away from landfills and if the funding received meets their programs' needs.

Many of the municipalities commented that they had been operating a program for packaging and paper before the implementation of the Multi-Material Recycling Program, and their programs have not changed with the implementation of the provincial program. A couple of municipalities indicated that funding from MMSW for participating in the Multi-Material Recycling Program has allowed them to lower utility rates for recycling collection services.

Municipalities believe that the funding received from the program is inadequate, as it does not cover anywhere near 75 per cent of program costs. Of the municipalities who provided numerical figures, the funding they received covered 15 to 54 per cent of program costs. The disparity between funding and program costs has become more apparent since the 2018 closure of China's commodity markets for recyclable materials, which has dramatically increased the costs of recycling.

Municipalities brought forward several concerns regarding the state of their recycling programs, including the following:

- Salvage values for many materials have decreased considerably over the last several years or now include fees instead of generating revenue.
- Municipalities are burdened by packaging waste that, while technically recyclable, is not a desirable market commodity.
- Municipalities have additional internal costs related to increased reporting requirements and additional education and outreach to reduce contamination levels in their recycling stream.
- To reduce costs and continue offering a program to their residents, many municipalities have stopped collecting glass and certain types of plastic, conduct contamination audits and/or conduct extra post-collection sorting to reduce contaminants before shipping to a processor.
- In many smaller communities, residential and commercial waste is not collected separately. Since the institutional, commercial and industrial (ICI) sector is not part of the Multi-Material Recycling Program, municipalities with comingled residential/commercial materials receive a reduction in program funding.

### Industry

Some stewards indicated that internal administrative costs to track and report packaging and paper supplied to households are high and the program fees for designated materials are overly costly, especially for small businesses. Several indicated that the cost of administering the program should be kept as low as possible and requested more clarity on the amount of funding producers are required to pay into the program each year. Some requested the ministry conduct a cost-benefit analysis to seek input from stewards on whether there is value for money and to ensure actual benefits are achieved through the program. Some stewards indicated there is a lack of communication about the program's benefits and effectiveness relative to the costs.

While some stewards mentioned the program fees for materials were costly, several stewards reported that recycling fees per kilogram are not significant and do not influence businesses to change their

packaging, especially if less-recyclable alternatives are made from lighter packaging. Several stakeholders indicated that the current fee structure is missing the opportunity to send a signal back to producers who put non-recyclable or hard-to-recycle packaging into the marketplace.

## Designated Materials

### Material Definitions and Categories

During engagement, the ministry asked if the scope of the regulations should be expanded to include packaging-like products and single-use plastic items, and if any products or materials should be exempt from the program. Packaging-like products are often indistinguishable from packaging when recycled and consumers generally expect to recycle them through municipal blue box programs. These items are generally purchased by consumers as products and may include sandwich bags, aluminum foil pie plates, plastic shrink film wrap and plastic plant pots. Single-use products may not always be thought of as packaging, but similarly serve a single or short-term purpose (e.g. straws, stir sticks, utensils, plates, bowls and cups).

Several stewards want Saskatchewan to adopt harmonized definitions and a standardized list of accepted materials in collaboration with other stakeholders and provinces. Consistent definitions across jurisdictions can provide regulatory certainty, improved efficiency and reduced administrative burden for stewards.

### Single-use and Packaging-like Products

Several stakeholders advocated for single-use plastics to be managed through a national approach, referencing the Government of Canada's commitment to ban certain single-use plastics by 2022, including checkout bags, straws, stir sticks, six-pack rings, cutlery and foodware made from hard-to-recycle plastics.

Several stewards expressed that single-use products used for food storage, preservation and protection (e.g. food storage bags and film wraps) are difficult and costly to manage, and necessary to maintain food safety, improve shelf life and reduce wastage. In the shared-responsibility program model, municipalities are struggling to manage plastics currently accepted through the program. Some municipalities suggested that including additional hard-to-recycle materials may cause further hardships related to collecting, processing and finding buyers.

While several stakeholders agree that single-use products may require a different approach, other stakeholders would like to see packaging-like products included in the regulations because they are indistinguishable from other currently accepted items, and consumers may already place these items in their recycling bins.

If packaging-like and single-use products were to be added to the regulations, some stewards commented that products or packaging designed to be reusable, recyclable or compostable should not be included. Additionally, many stewards requested that the designation of materials and the definitions of materials categories be consistent with other jurisdictions and/or other related initiatives, such as the CCME's EPR consistency guidance document (to be released in 2021-22). Adding packaging-like and

single-use products would harmonize the list of designated products with British Columbia, Ontario and the proposed list provided in Alberta's EPR discussion paper.

### Other Materials

Some stewards commented that certified compostable materials should not be included in the Multi-Material Recycling Program but should, instead, be part of municipal composting programs. However, a few stakeholders expressed concern about compostable and biodegradable plastics. Saskatchewan's composting infrastructure does not have the ability to manage compostable plastics and biodegradable plastics are not compatible with Saskatchewan's recycling infrastructure.

### Recovery Rates and Performance Targets

During engagement, the ministry asked if the regulations should specify program targets, such as recovery rate targets or sustainability performance indicators, and what should be considered when setting targets. The ministry also asked if regulators could encourage producers to reduce the use of hard-to-recycle or non-recyclable packaging, and if there is a role for energy recovery (i.e. waste-to-energy) in the program.

In the existing shared responsibility program, municipalities implement their own municipal programs to collect materials, which means producers have no ability to influence if potential recovery/performance targets are met. If a cost-shared EPR model continues, and targets are established for municipal recycling programs, stewards want to ensure that municipalities would be responsible for meeting targets, and municipalities would like those targets to take into consideration current performance and funding limitations.

If targets are implemented in a full EPR program, stewards indicate that targets should be measurable, achievable, use performance-based language and include timelines. Targets should focus on environmental outcomes (i.e. waste reduction and diversion), as well as consumer awareness and accessibility. Some stakeholders suggest that the producers and producer responsibility organization should establish targets, as they have access to infrastructure and the data required to suggest meaningful targets that are achievable within the current market context. However, other stakeholders suggest that the government should set targets and develop standards to ensure a level playing field and allow stewards to develop a program using the most efficient and cost-effective solutions possible. Regardless of who develops the targets, the setting of targets and performance measures should be a collaborative process with key stakeholders' engagement. Additionally, stakeholders request a grace period before target enforcement begins or a phased-in approach allowing targets to be increased over time.

If recovery rate targets are to be implemented, stakeholders request that targets for material categories be harmonized with other provinces where possible and broad enough (e.g. rigid plastic, flexible plastic, metal) to capture multiple materials without causing significant reporting and administrative burden associated with narrow and specific categories (e.g. PET, HDPE). However, some stewards suggest that targets are not necessary as many producers have already made their own waste reduction pledges,

such as committing to ensuring 100 per cent of their packaging is recyclable, compostable or reusable by 2025 through the Canada Plastics Pact.

### Waste Management Hierarchy

To help promote a circular economy, stakeholders suggest including a waste management hierarchy (i.e. reduce, reuse, recycle, recovery, residuals management) that requires producers to demonstrate how their packaging is becoming more circular. One of the objectives of EPR is to encourage producers to reduce the amount of packaging and paper placed into the market and/or improve the environmental performance of their packaging. Several stakeholders suggest considering British Columbia's Pollution Prevention Hierarchy, which provides a guideline for the appropriate management of material. Producers should only explore opportunities for recycling after exhausting all opportunities for reduction and reuse of materials. Stakeholders further note that if source reduction is a regulatory requirement, it should be realistic and consider whether packaging alternatives are adequate (i.e. robust enough to protect the product, minimize product loss and/or preserve shelf life).

In the current program, high-value materials carry lower fees for producers as they generate higher revenue when collected and recycled, which provides producers with an incentive to use materials that are easily collected and readily recyclable. However, stakeholders note that producers still use multi-material packaging, film plastic, expanded polystyrene and other hard-to-recycle materials. Stakeholders encourage the ministry to strengthen regulations to require producers to redesign their packaging to support a circular economy through several potential options, including requiring higher fees or levies to be paid on hard-to-recycle materials; providing incentive credits toward reduced EPR fees for businesses that use sustainable materials; banning the production or distribution of certain materials within the province; and/or mandating recycled content requirements where it makes sense to do so and where it is clearly demonstrated that markets for recycled plastic content exist.

While some stakeholders do not promote waste-to-energy as an acceptable end-of-life management strategy, others want energy recovery to be considered when something cannot be recycled due to its material type, condition or level of contamination.

### Non-Residential Waste

The ministry engaged with stakeholders to consider packaging and paper supplied or distributed to the industrial, commercial and institutional (ICI) sector, such as office buildings, warehouses, stadiums, grocery stores and food services, and institutions.

Several stakeholders, including municipalities, waste collectors and some stewards, believe regulating packaging and paper from non-residential sectors should be a priority and should either be included in the existing regulations or separate sector-specific regulations. In rural and remote communities, municipal waste collectors are penalized for the ICI materials collected on the same routes or in the same containers as residential waste. In these communities, municipalities are bearing the cost of collection and shipping of these materials, increasing their costs for residential recycling programs. Waste collectors suggest the program should allow these services to continue without penalties to the municipalities.

Most stewards do not support including ICI materials within the existing residential-focused program or a separate EPR program. Non-consumer facing packaging (i.e. transport or tertiary packaging) and consumer facing or point-of-purchase packaging (i.e. primary or secondary packaging) require separate policy frameworks. Many companies already have existing waste management arrangements and systems to effectively manage, minimize and safely handle their own ICI waste streams. Given the complexity and unique circumstances of different material management, regulating ICI sources of packaging and paper waste requires significantly more research and may require alternative policy options to EPR.

If ICI is included in an EPR program, ICI materials must have more narrowly defined parameters. These sectors are vastly different in composition and recycling needs. Some stewards suggest it would be more effective to have waste diversion requirements for facility and business owners, sometimes referred to as 'generator responsibility,' similar to Ontario's requirements for ICI establishments to reduce and divert waste. Other stewards advocate for the continued use of the exclusions and deductions policy used by the programs in Saskatchewan, British Columbia and Manitoba. Stewards also recommend facilitating separate engagement with generators of ICI waste to determine how they collectively could identify opportunities and solutions for better managing their waste streams.

### Regulatory Red Tape Reduction

During engagement, the ministry asked stewards to identify red tape associated with the regulations or related policies and procedures that negatively impact Saskatchewan businesses or industry.

### Harmonization

Stewards provided feedback that the single greatest impact the government can have to reduce red tape is by harmonizing the regulations with other jurisdictions, especially other western provinces, to the greatest extent possible. Stewards noted key areas for harmonization should align with work done by the CCME on harmonizing EPR frameworks. The primary areas suggested for harmonization are detailed throughout this report and include definitions, business exemptions, designated materials, and material categories and targets. Harmonization of these critical components will achieve efficiencies and help develop the economies of scale required to pursue innovation and responsibly manage materials.

### Steward Reporting

The regulations require the producer responsibility organization to submit annual reports describing the activities of the program, including the types and amount of residentially generated waste packaging and paper supplied for use in Saskatchewan by stewards and non-resident brand owners. This results in stewards tracking and reporting their annual tonnage of packaging and paper supplied to Saskatchewan households.

Some businesses identified that the reporting requirements are time consuming, increase administrative overhead and add to overall operational costs. Several businesses identified that determining and reporting the weight of packaging for the various material categories is challenging. Stakeholders provided suggestions to reduce red tape in the reporting process, including reporting on units sold and applying an average industry weight instead of reporting by actual weight; grouping materials into

fewer, more generalized categories; and using a flat fee and reduced reporting options for small producers.

## Other Areas to Consider

### Regulatory Considerations

Several stakeholders said that regulations should be outcomes-based and use performance-based language. Regulations should specify reporting requirements and verification standards, but not matters relating to how EPR programs organize themselves, the ways in which materials are managed to achieve targets, or the design of the recycling program. If the program transitions to full EPR, stakeholders would like the program to provide clear roles and delineations regarding the responsibility of municipalities and stewards.

### Definition of a Steward

Stewards recommended revising the determination of a steward clause and the definitions for brand owner and non-resident brand owner to align with CCME guidance and other jurisdictions. The definitions should capture producers who sell into Saskatchewan but are located outside the province, and should provide clarity on which businesses in the supply chain hold the responsibilities of a steward. Additionally, stakeholders requested that language be integrated into the regulations that would obligate producers who are residents of Canada (rather than Saskatchewan), as well as e-commerce sellers and marketplace facilitators. However, other stewards recognize that enforcing regulations outside of provincial borders can be challenging and believe that first sellers of a product in the province is the most straightforward definition of an obligated steward.

### Producer Responsibility Organization

Several stewards commented that Saskatchewan should encourage the use of a single producer responsibility organization, as is the current status in the province. Stewards suggested that the individual producer responsibility framework being implemented in Ontario should not be used as a model, as it is overly complex and loses sight of environmental outcomes.

Stewards suggested continuing with Saskatchewan's current practice of requiring the producer responsibility organization to submit a product stewardship program plan on behalf of obligated stewards. They also suggested the producer responsibility organization manage producers' supply and performance reporting, in an aggregated form, for reduced administrative burden on companies and better protection of commercially sensitive supply information.

Additionally, stewards articulated that government should have no authority to determine or nominate board members of a producer responsibility organization but must ensure they include obligated stewards in their governance structure.

Several stakeholders cited transparency as an important part of an effective regulatory framework. Stewards want to continue with the requirement for public reporting of program results, while also ensuring the protection of confidential business information. Some stakeholders reported a lack of transparency from the producer responsibility organization in terms of how producer fees are determined and set, as well as data collection from municipal program audits and cost studies used to determine funding amounts for municipal recycling programs.

## Investing in Infrastructure

Several stakeholders commented that there is a lack of sufficient recycling capabilities to meet the needs of the current program. The government should address the shortfalls in recycling infrastructure in Saskatchewan before expanding the program to include more materials. To divert more recyclable materials from landfills, the government should provide funding to develop, modernize and expand plastic recycling infrastructure in Saskatchewan so materials can be managed domestically, reducing dependence on foreign markets.

## COVID-19

Several stewards noted that engagement on the regulations and program took place during the COVID-19 pandemic. Many businesses experienced significant financial losses and several closed permanently during this time. The impact of COVID-19 on packaging in the food services industry is particularly significant, as many restaurants continue to rely on takeout and delivery sales. Some industry associations requested the government conduct additional engagement with stakeholders and postpone changes to the regulations and program until businesses have time to recover.

## Next Steps

Through the regulatory review and engagement process, the ministry will work with businesses, municipalities and interest groups to create a sustainable program for packaging and printed paper. This program will increase opportunities for residents and producers to reduce waste, support a circular economy, ensure an appropriate level of service to urban, rural and remote communities, reduce burden on municipalities and stewards, and encourage innovative local solutions.

The information received during the engagement process will help ensure an effective and efficient Multi-Material Recycling Program and help the ministry better understand key interests and concerns during the regulatory review. The ministry will begin drafting regulatory amendments in winter 2021-22, with plans to engage stakeholders and interest groups on the draft regulations in 2022.

## Appendices

### Appendix A – List of Participants

<b>Municipal Government and Regional Waste Authorities</b>
<b>Municipalities</b>
City of Lloydminster
City of Martensville
City of Melville
City of Nipawin
City of North Battleford
City of Regina
City of Saskatoon
City of Swift Current
City of Warman
City of Yorkton
Town of Grand Coulee
Village of Frontier
Village of Muenster
Village of Middle Lake
<b>First Nations &amp; Tribal Councils</b>
Lac La Ronge Indian Band
<b>Municipal Associations</b>
Saskatchewan Urban Municipalities Association
Saskatchewan Association of Rural Municipalities
<b>Regional Waste Management Authorities</b>
Association of Regional Waste Management Authorities of Saskatchewan
Regional Authority of Carlton Trail (REACT)
North Valley Waste Management Authority
Boreal Area Regional Waste Authority Inc.
<b>Business/Industry - End of Life Materials Management</b>
Advanced Waste Solutions
Cosmopolitan Industries Ltd. Saskatoon
Emterra Group
GFL Environmental Inc.
<b>Business/Industry - Producer or Seller</b>
3M Canada
Clorox Canada
CKF Inc.
Costco Wholesale Canada Ltd.
Federated Co-operatives Limited
Hawthorne Gardening Company
Home Hardware Stores Limited

Loblaws Inc.
Lowe's Canada
Premier Tech Home & Garden
SC Johnson
Scotts Canada Limited / Hawthorn Canada Limited
Sherwin-Williams Global Products Stewardship & Sustainability
Synergy Credit Union
The Beer Store and Brewers Distributor Limited
The Mosaic Company
<b>Industry Associations</b>
Association of Home Appliance Manufacturers
Canadian Beverage Association
Canadian Consumer Specialty Products Association
Canadian Federation of Independent Businesses
Chemistry Industry Association of Canada
Food, Health & Consumer Products of Canada
Global Product Stewardship Procter & Gamble
News Media Canada
Restaurants Canada
Retail Council of Canada
Retired Teachers of Ontario (RTOERO)
Saskatchewan Chamber of Commerce
Solid Waste Association of North America
<b>Interest Groups</b>
<b>Environmental Non-Profit Organizations</b>
Recycle Saskatchewan
Saskatchewan Waste Reduction Council
<b>Stewardship and Producer Responsibility Organizations</b>
Canadian Stewardship Services Alliance
Carton Council of Canada
Electronic Products Recycling Association Saskatchewan
Electronics Product Stewardship Canada
Multi-Material Stewardship Western
Product Care Association
SARCAN
Saskatchewan Association for Resource Recovery Corporation
RYSE Solutions
<b>Academics / Researchers</b>
University of Regina
<b>Government</b>
SaskTel

## Online Survey for *The Household Packaging and Paper Stewardship Program Regulations* and Multi-Material Recycling Program

### Initial question to distinguish sector type

Which option best describes your relationship with the Multi-Material Recycling Program (MMRP)?

- I am a waste collector.
  - **Waste collector:** a person, organization or business that collects or manages waste, including municipalities/municipal associations, First Nations, regional waste management authorities, and waste haulers, contractors and recyclers.
- I represent a steward/business.
  - **Steward/business:** stewards or businesses that are obligated by the regulations to participate in the program, small businesses that have been provided with an exemption under the regulations, and industry associations that represent businesses.
- I have a general interest in the MMRP.
  - **General interest:** interested organizations, groups and members of the general public.

### About You

1. Who do you represent (please select one only)?
  - Municipality
  - First Nation
  - Municipal association
  - Regional waste management authority
  - Waste hauler, contractor or recycler
  - Other: \_\_\_\_\_
2. What type of municipality?
  - Rural municipality
  - Hamlet, Village or Resort Village
  - Northern Village
  - Town
  - City
3. Which municipality, First Nation, municipal association, regional waste management authority, or waste hauler, contractor or recycler do you represent (optional)? \_\_\_\_\_

## Areas for Consideration

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

### Full Extended Producer Responsibility (EPR)

4. The current regulations and program require businesses obligated by the regulations to provide funding for up to 75 per cent of the cost of municipal recycling programs for packaging and printed paper.
  - (a) What would be some of the opportunities and challenges associated with shifting towards a full producer responsibility program in Saskatchewan? \_\_\_\_\_
5. Does your community have municipal assets, such as recycling collection containers and vehicles, and/or processing facilities that could be impacted by a transition to a full EPR program?
  - Yes, No or Not Applicable. Comments: \_\_\_\_\_

### Business Exemptions

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

6. Should there be any exemptions or alternatives available for businesses that meet certain criteria? Why or why not? Write answer in Comments section below.
  - Yes or No. Comments: \_\_\_\_\_
7. If there continues to be exemptions for businesses under a certain revenue threshold, what should be the revenue threshold to exempt businesses from participating in the program (choose one)?
  - Less than \$5 million gross revenue annually
  - Less than \$2 million gross revenue annually (current revenue threshold)
  - Less than \$1 million gross revenue annually
  - All producers should be required to participate
  - Other amount: \_\_\_\_\_
8. Should there be exemptions for businesses that have a single point of retail sale in Saskatchewan?
  - Yes or No. Comments: \_\_\_\_\_

9. Should there be exemptions for businesses that produce less than one tonne of packaging and paper annually?
- Yes or No. Comments: \_\_\_\_\_
10. Are there other criteria that should be considered when determining if a business qualifies for an alternative or exemption? \_\_\_\_\_

### **Program Costs and Funding**

11. As a municipality, First Nation or regional waste management authority, did you have a municipal program to collect and recycle packaging and printed paper before the Multi-Material Program was established?
- Yes, No or Not Applicable.
12. How has your program changed since the implementation of the Multi-Material Program?  
\_\_\_\_\_
13. As a municipality, First Nation or regional waste management authority participating in the Multi-Material Recycling Program, is the program helping you divert packaging and printed paper away from the landfill?
- Yes, No or Not Applicable. Comments: \_\_\_\_\_
14. Is the funding you receive through the Multi-Material Recycling Program meeting the needs of your municipal recycling program?
- Yes, No or Not Applicable. Comments: \_\_\_\_\_
15. If you represent a hauler, contractor or recycler, are you facing challenges in terms of rising costs and, if so, in what way?
- Yes, No or Not Applicable. Comments: \_\_\_\_\_
16. As a municipality or waste collector, what measures have you taken to limit or reduce costs?  
\_\_\_\_\_

### **Designated Materials**

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

17. How can regulators best encourage producers to reduce the use of hard-to-recycle or non-recyclable packaging, such as flexible packaging with plastic laminates or multi-material packaging? \_\_\_\_\_

**18.** Should the scope of obligated materials be broadened to include packaging-like products, such as food storage bags and containers, or single-use plastic items, such as drinking straws and plastic cutlery?

- Yes or No.

**19.** Which packaging-like products do you suggest are the highest priority for inclusion?

\_\_\_\_\_

**20.** Are there any packaging or packaging-like products you believe should be exempt from being obligated by the regulation?

- Yes, No or Not Applicable. Comments: \_\_\_\_\_

**Non-Residential Waste**

**21.** In the regulations, businesses and organizations who supply or distribute packaging and paper to residential households in Saskatchewan are obligated to participate in the program. Do you think packaging and paper supplied or distributed to the industrial, commercial and institutional (ICI) sector should be included in the regulations?

- Yes or No. Comments: \_\_\_\_\_

**22.** Should ICI materials be managed by a separate program rather than the current program for residential materials?

- Yes or No. Comments: \_\_\_\_\_

**Other Areas to Consider**

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

\_\_\_\_\_

## Online Survey for *The Household Packaging and Paper Stewardship Program Regulations* and Multi-Material Recycling Program

### Initial question to distinguish sector type

Which option best describes your relationship with the Multi-Material Recycling Program (MMRP)?

- I am a waste collector.
  - **Waste collector:** a person, organization or business that collects or manages waste, including municipalities/municipal associations, First Nations, regional waste management authorities, and waste haulers, contractors and recyclers.
- I represent a steward/business.
  - **Steward/business:** stewards or businesses that are obligated by the regulations to participate in the program, small businesses that have been provided with an exemption under the regulations, and industry associations that represent businesses.
- I have a general interest in the MMRP.
  - **General interest:** interested organizations, groups and members of the general public.

### About You

1. Who do you represent (please select one only)?
  - Obligated business (“steward”)
  - Small business that has been provided an exemption under the regulations
  - Business/industry association
  - Other: \_\_\_\_\_
2. What business or industry association do you represent (optional)? \_\_\_\_\_
3. How many employees work at the business you are representing?
  - 0-10 employees
  - 10-25 employees
  - 26-49 employees
  - 50-99 employees
  - 100+ employees
4. How familiar are you with *The Household Packaging and Paper Stewardship Program Regulations*?
  - Very familiar
  - Familiar
  - Somewhat familiar
  - This is the first time I have heard about the regulations

## Areas for Consideration

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

### Full Extended Producer Responsibility (EPR)

5. One of the actions of the national Strategy on Zero Plastic Waste is to facilitate consistent EPR programs for plastic. What elements of EPR need to be consistent across Canada?
  
6. What elements need to be specific to Saskatchewan? \_\_\_\_\_

### Business Exemptions

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

7. Should there be any exemptions or alternatives available for businesses that meet certain criteria? Why or why not? Write answer in Comments section below.
  - Yes or No. Comments: \_\_\_\_\_
  
8. If there continues to be exemptions for businesses under a certain revenue threshold, what should be the revenue threshold to exempt businesses from participating in the program (choose one)?
  - Less than \$5 million gross revenue annually
  - Less than \$2 million gross revenue annually (current revenue threshold)
  - Less than \$1 million gross revenue annually
  - All producers should be required to participate
  - Other amount: \_\_\_\_\_
  
9. Should there be exemptions for businesses that have a single point of retail sale in Saskatchewan?
  - Yes or No. Comments: \_\_\_\_\_
  
10. Should there be exemptions for businesses that produce less than one tonne of packaging and paper annually?
  - Yes or No. Comments: \_\_\_\_\_

11. Are there other criteria that should be considered when determining if a business qualifies for an alternative or exemption? \_\_\_\_\_
12. What steps could the government take to ensure a level playing field among all producers, including online marketplaces that sell into Saskatchewan? \_\_\_\_\_

### **Designated Materials**

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

13. How can regulators best encourage producers to reduce the use of hard-to-recycle or non-recyclable packaging, such as flexible packaging with plastic laminates or multi-material packaging? \_\_\_\_\_
14. Should the scope of obligated materials be broadened to include packaging-like products, such as food storage bags and containers, or single-use plastic items, such as drinking straws and plastic cutlery?
  - Yes or No.
15. Which packaging-like products do you suggest are the highest priority for inclusion?  
\_\_\_\_\_
16. Are there any packaging or packaging-like products you believe should be exempt from being obligated by the regulation?
  - Yes or No. Comments: \_\_\_\_\_

### **Non-Residential Waste**

17. In the regulations, businesses and organizations who supply or distribute packaging and paper to residential households in Saskatchewan are obligated to participate in the program. Do you think packaging and paper supplied or distributed to the industrial, commercial and institutional (ICI) sector should be included in the regulations?
  - Yes or No. Comments: \_\_\_\_\_
18. Should ICI materials be managed by a separate program rather than the current program for residential materials?
  - Yes or No. Comments: \_\_\_\_\_

## Other Areas to Consider

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

## Red Tape Reduction

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

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

**25.** How would you rank the Government of Saskatchewan's goal of reducing red tape as an important issue facing your business?

- Within the top 1-2 issues
- Within the top 5 issues
- Within the top 10 issues
- Not in the top 10 issues
- Not sure/I don't know

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

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## Online Survey for *The Household Packaging and Paper Stewardship Program Regulations* and Multi-Material Recycling Program

### Initial question to distinguish sector type

Which option best describes your relationship with the Multi-Material Recycling Program (MMRP)?

- I am a waste collector.
  - **Waste collector:** a person, organization or business that collects or manages waste, including municipalities/municipal associations, First Nations, regional waste management authorities, and waste haulers, contractors and recyclers.
- I represent a steward/business.
  - **Steward/business:** stewards or businesses that are obligated by the regulations to participate in the program, small businesses that have been provided with an exemption under the regulations, and industry associations that represent businesses.
- I have a general interest in the MMRP.
  - **General interest:** interested organizations, groups and members of the general public.

### About You

1. Who do you represent (please select one only)?
  - Non-profit organization
  - Program stewardship organization or stewardship management board
  - Academics or researchers
  - Other: \_\_\_\_\_
  
2. Which non-profit, organization, university, etc. do you represent (optional)?  
\_\_\_\_\_

### Areas for Consideration

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

### Full Extended Producer Responsibility (EPR)

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

printed paper. What would be some of the opportunities and challenges associated with shifting towards a full producer responsibility program in Saskatchewan? \_\_\_\_\_

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

### **Business Exemptions**

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

6. Should there be any exemptions or alternatives available for businesses that meet certain criteria? Why or why not? Write answer in comments section below.
  - Yes or No. Comments: \_\_\_\_\_
7. If there continues to be exemptions for businesses under a certain revenue threshold, what should be the revenue threshold to exempt businesses from participating in the program (choose one)?
  - Less than \$5 million gross revenue annually
  - Less than \$2 million gross revenue annually (current revenue threshold)
  - Less than \$1 million gross revenue annually
  - All producers should be required to participate
  - Other amount: \_\_\_\_\_
8. Should there be exemptions for businesses that have a single point of retail sale in Saskatchewan?
  - Yes or No. Comments: \_\_\_\_\_
9. Should there be exemptions for businesses that produce less than one tonne of packaging and paper annually?
  - Yes or No. Comments: \_\_\_\_\_
10. Are there other criteria that should be considered when determining if a business qualifies for an alternative or exemption? \_\_\_\_\_

## Designated Materials

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

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12. Should the scope of obligated materials be broadened to include packaging-like products, such as food storage bags and containers, or single-use plastic items, such as drinking straws and plastic cutlery?
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13. Which packaging-like products do you suggest are the highest priority for inclusion?  
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14. Are there any packaging or packaging-like products you believe should be exempt from being obligated by the regulation?
  - Yes or No. Comments: \_\_\_\_\_

## Non-Residential Waste

15. In the regulations, businesses and organizations who supply or distribute packaging and paper to residential households in Saskatchewan are obligated to participate in the program. Do you think packaging and paper supplied or distributed to the industrial, commercial and institutional (ICI) sector should be included in the regulations?
  - Yes or No. Comments: \_\_\_\_\_
16. Should the ICI materials be managed by a separate program than the current program for residential materials?
  - Yes or No. Comments: \_\_\_\_\_

## Other Areas to Consider

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