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Packaging and Printed Paper (PPP) Program Plan Renewal 2017-2021

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1 Introduction

1.1 Multi-Material Stewardship Manitoba Inc.

Multi-Material Stewardship Manitoba Inc. (MMSM) is a not-for-profit industry-financed organization that was formed by representatives of obligated stewards to develop, implement and operate a diversion program for designated packaging and printed paper in the Province of Manitoba, on behalf of its members.

1.2 Regulatory Context

The Packaging and Printed Paper Regulation 195/2008 ("the Regulation"), enacted in December 2008 under the *Waste Reduction and Prevention (WRAP) Act* ("the Act"), established requirements for a stewardship program for packaging and printed paper (PPP) made from paper, plastic, metal or glass, and supplied for use in the Province of Manitoba. An accompanying Guideline for Packaging and Printed Paper Stewardship sets out components to be addressed in a program plan.

1.3 Background

The MMSM Packaging and Printed Paper Program Plan ("the PPP Program Plan" or "the Plan") was developed in response to the Regulation and was approved by the Minister of Conservation in September 2009 for a five (5) year term. The MMSM Program launched on April 1, 2010.

In October 2010, MMSM signed a Memorandum of Understanding (MOU) with Canadian Beverage Container Recycling Association (CBCRA). This MOU transferred responsibility of the 75% beverage container recovery target from MMSM to CBCRA.

In October 2014, MMSM requested and received approval for a one (1) year extension on the original MMSM PPP Program five (5) year term. This approval expires November 16, 2016.

1.4 Program Goals and Objectives

The primary goals of the MMSM PPP Program are to promote the reduction, reuse and recycling of designated packaging and printed paper in the province of Manitoba and to sustainably increase recovery and recycling rates of the designated material.

1.5 MMSM Vision and Mission

MMSM's vision is to be a leader in responsible product stewardship in Manitoba.

MMSM's mission is to ensure that its members are fulfilling their stewardship requirements under the WRAP Act in a cost effective way.

2 Designated Materials

Section 1 of the Regulation defines the designated materials as follows:

"packaging means any package or container, or any part of a package or container, that is comprised of glass, metal, paper or plastic, or any combination of any of those materials and includes, but is not limited to, service packaging"; and

"printed paper means paper that is not packaging, but is printed with text or graphics as a medium for communicating information, and includes telephone directories, but does not include: (a) other types of bound reference books; (b) bound literary books; or (c) bound text books".

The Regulation identifies two categories of packaging:

"pre-packaged goods means goods that are in the packaging in which they would ordinarily be supplied for consumption"; and

"service packaging means packaging that is filled or applied at the point of sale to enable or facilitate the delivery of goods by a retail seller or a food service industry or other service industry outlet".

As these definitions are broad in scope, the PPP Program Plan further defines packaging and printed papers for purposes of steward reporting and determining eligible program costs. A complete list of packaging and printed paper categories and subcategories is available at www.stewardshipmanitoba.org and is appended to the Rules for Stewards.

Packaging that is covered under another stewardship plans is excluded from MMSM's PPP Stewardship Plan. This packaging is not to be reported by stewards to MMSM. Collection and management costs associated with this packaging are not eligible under MMSM's PPP Stewardship Plan.

3 Steward Responsibilities

3.1 Obligated Stewards

For the purpose of the PPP Program Plan and determining which person shall be the obligated steward for a particular category of designated PPP (DPPP), the following provisions shall apply, in the order in which they are set out. For greater certainty, if two or more persons are obligated pursuant to the following categories, the provision which is first in this list shall prevail¹:

- a) A Brand Owner is the obligated Steward with respect to all DPPP and the Packaging of all goods, for which it has a Commercial Connection in the Data Year;
- b) A Franchisor is the obligated Steward with respect to all DPPP and the Packaging of all

¹ Definitions for the capitalized words in a) to h) are in the Steward Rules posted on MMSM's website at www.stewardshipmanitoba.org.

- goods, Supplied within the relevant Franchise System in the Data Year;
- In the event that there is no Brand Owner or Franchisor, a First Importer is the obligated Steward with respect to all DPPP and the Packaging of all goods for which it is the First Importer in the Data Year;
- d) In the event there is more than one Brand Owner for the same DPPP, the Brand Owner or First Importer more directly connected to the production of the DPPP shall be the obligated Steward, provided that in the case of a Franchisor who is Resident in Manitoba, the Franchisor shall be the obligated Steward;
- e) In the event that consumer products containing two or more independent brands are packaged together for sale in Manitoba, then the Brand Owner more closely associated to the joint packaging shall be the obligated Steward for such joint Packaging;
- f) In the event there is not an identifiable brand for a particular DPPP and if the manufacturer of the good is Resident in Manitoba, the manufacturer of such good shall be the obligated Steward for such DPPP, otherwise the First Importer shall be the obligated Steward for such DPPP;
- g) Any person who Supplies Service Packaging to consumers in Manitoba in the Data Year; and
- h) Any person who is a Voluntary Steward in the Data Year.

This description of the obligated steward is subject to revision for clarity and continuous improvement.

3.2 Voluntary Stewards

MMSM has implemented a Voluntary Steward Policy, harmonized with other provinces, that provides reporting flexibility by allowing a company to report and pay fees on behalf of an otherwise obligated steward. The purpose of the process is to provide an opportunity for another company to accept reporting responsibilities and make payments on behalf of a company that would otherwise be the steward in order to reduce the administrative burden on the other steward. A copy of the Voluntary Steward policy is available on our website at www.stewardshipmanitoba.org

3.3 Rules for Stewards

MMSM has developed Rules for Stewards setting out the requirements for reporting and the amount of fees to be paid by participating stewards and/or prescribing methods for determining the amount of the fees. MMSM Rules for Stewards outline the following:

- Definition of stewards;
- Definition of packaging and printed paper;
- Fees for packaging and printed paper;
- Reporting and payment requirements;
- Penalties for late reporting and late payment;
- Allowance for a company to report and pay fees on behalf of an otherwise obligated steward;
- Record retention and audit provisions;
- Steward exemptions; and
- Dispute resolution process.

The Board of MMSM reviews the Rules as required on an annual basis. Notification of all proposed changes to the Rules will be sent to registered stewards and posted on the MMSM website. A notice period of no less than 30 days will be allowed for comment on the proposed changes. Following review of comments received, the Board of Directors of MMSM will vote on proposed changes as per the bylaws of the corporation. Following review and approval by the MMSM Board of Directors, MMSM will communicate to stewards the rule changes to be implemented and the date they will take effect. The current steward rules are available at www.stewardshipmanitoba.org

3.3.1 Online Data Management System

In an effort to promote harmonization with other provincial packaging and printed paper programs, MMSM has contracted with Canadian Steward Services Alliance (CSSA) to provide administrative and steward services, including the use of its Online Steward Data Entry System.

3.3.2 Data Reporting Requirements

Under the PPP Program Plan, stewards are required to report annually to MMSM the total quantity (in kilograms and plastic bag units) of designated packaging and printed paper supplied for use in households in the province.

The reported kilograms of packaging and printed paper are used to determine a steward's total fees payable to MMSM.

In addition, stewards reporting to MMSM are required to:

- Identify the brands, products, customers or suppliers for which the steward is responsible;
- Provide a detailed explanation of the steps taken to calculate the total quantity of packaging and printed paper;
- Provide details on the deducted quantities of designated material that are not supplied to consumers for use in households and available to be managed through Manitoba's residential diversion system (by material type, number of units and weight) and explain the method by which this deduction was derived (e.g., customer sales records, market research, waste audits etc.); and
- Maintain records for a period of at least five years and make these records available to MMSM upon request.

3.3.3 Audit Provisions

Stewards are required to maintain records for a period of at least five years in support of all data submitted to MMSM.

MMSM may examine, audit and inspect a steward's records at any time up to five years after the date of receipt of the related steward report by MMSM. The number of steward reports to be audited in any given program year is determined by MMSM on an annual basis.

3.4 Enforcement Procedures

Through the maintenance of a public registry of identified stewards and the development of a tracking system to monitor compliance, MMSM actively encourages compliance. The registry includes:

- 1. All persons for which these persons are the obligated stewards under the PPP Program Plan; and
- 2. All persons for which these persons are the voluntary stewards under the PPP Program Plan.

Field research is performed by MMSM to identify non-compliant stewards, utilizing leads generated by complying stewards, or independently through store and product audits.

MMSM has implemented a non-compliance notification process, including written notification of when reports and fees are due. If stewards and products are identified that have not registered or reported under the Program or another approved packaging and printed material stewardship program, obligated stewards for these materials will be notified. MMSM will execute an escalation policy with respect to non-compliant stewards; this policy will be published on MMSM's website. If the Steward's registration and data submission process is not complete after execution of the escalation process, MMSM may request the Manitoba Government to take enforcement action as stipulated under the WRAP Act.

4 Program Delivery

4.1 Collection and Management

MMSM works with municipalities and other partners to provide Manitoba residents with reasonable access to collection services for PPP. While the type of collection service varies across the province depending on the size, location and characteristics of each community, MMSM aims to provide reasonably consistent services for similar types of communities.

Participation of municipalities and other partners in MMSM's PPP Program is voluntary.

MMSM will pay 80% of eligible costs incurred by municipalities and other collection agents² who enter into a services agreement with MMSM. The services agreement sets out the roles and responsibilities of each party, including the recycling services to be provided by municipalities and other partners and the payments to be made by MMSM. Recycling services include:

- Collection of the specified types of PPP;
- Collection services appropriate for the community and designed to protect the quality of collected PPP and maximize commodity revenue;
- Communications to users of the collection service;
- Delivery of the collected PPP to a processor or broker registered with MMSM;
- Quarterly reports of PPP collected supported by weigh scale tickets; and

² MMSM will also enter into a services agreement with provincial and federal parks.

Submission of costs through the annual cost monitoring survey.

The services agreement also:

- Provides MMSM with access to records and facilities for purposes of audits and studies;
- Provides the municipality with access to MMSM's technical assistance, including identification of opportunities for system improvements, assessments of proposed capital purchases and contractual arrangements as well as assistance to promote collection services;
- Requires the municipality to provide MMSM with advance written notification of proposed changes to program design and delivery;
- Requires the municipality to provide MMSM standing in the municipal process to determine changes to program design and delivery and to take into consideration any advice received from MMSM; and
- Provides MMSM with the ability to treat costs arising from municipal decisions that do not reflect MMSM's advice as ineligible costs for purposes of payments to municipalities.

Given the number of municipalities in Manitoba, MMSM has established the Municipal Industry Program Committee (MIPC) as a forum for MMSM to discuss operational issues with representatives from the Association of Manitoba Municipalities (AMM). MIPC provides the forum for MMSM to consult with municipal representatives on various aspects of program delivery, including changes to the services agreement. Participating municipalities will be notified of any changes to the services agreement by MMSM.

While MMSM seeks to work collaboratively with municipalities and other collection partners to meet the obligations of stewards and deliver an effective recycling service to Manitoba residents, MMSM reserves the right to directly deliver recycling services, including curbside and/or depot collection and management of the collected PPP, in a jurisdiction, and to invoice the municipality for 20% of the net costs of doing so, if a municipality:

- Chooses not to enter into a services agreement with MMSM;
- Terminates an existing recycling program;
- Reduces collection services;
- Is unable to access a collection or processing service provider;
- Receives a single submission in response to a competitive procurement process for the provision of collection or processing services;
- Does not use a competitive procurement process for the provision of collection or processing services;
- Delivers collected PPP to a processor or broker that is not registered with MMSM; or
- Reports a year-over-year increase in total gross costs of 25% or more.

4.2 Recycling Program Data

4.2.1 Collection and Analysis

The quantity of PPP collected and directed to a processor or broker registered with MMSM, the costs of operating the recycling program and the commodity revenue received is collected and analyzed annually in order to:

Identify opportunities for continuous improvement to increase the material recovery

rate and reduce program costs;

- Identify eligible costs; and
- Calculate payments to municipalities to be made in the following year.

The data collected include:

- The quantity of material collected by each collector;
- The quantity of material directed to end users;
- Where services are delivered directly:
 - Capital costs for assets such as buildings, vehicles, balers;
 - Staff costs;
 - Operating costs, e.g. fuel, heating;
- Where services are subcontracted:
 - Contract costs for recycling collection and processing;
- Cost to transport material to a broker or market;
- Revenue sources and value; and
- Expenditures for promotion and education.

MMSM will verify the data through follow up with municipalities.

Once MMSM is confident that the data accurately represent municipal operations, the data will be analyzed to benchmark and compare program recovery rates, costs and revenues among Manitoba programs and to programs managing PPP in other jurisdictions. Data will be sorted to group similar programs based on municipal population and other characteristics that affect program costs³.

4.2.2 Audit Provisions

MMSM reserves the right to undertake an audit of the tonnage data submitted quarterly and the cost and revenue data submitted annually by a municipality or other collector. The services agreement provides MMSM with access to a municipality or other collector for purposes of these audits.

4.3 Determining Eligible Costs

4.3.1 Administration Costs

Payment to each municipality for administration costs is based on 80% of the lesser of:

- Eligible reported administration costs; or
- A specified percentage of total eligible operating costs.

Eligible reported administration costs are determined on the basis of the median net eligible administration costs for the group in which each municipality falls.

The specified percentage of total eligible operating costs is currently calculated as follows:

³ The placement of a municipality in a group will be reviewed based on changes in population or other characteristics that drive recycling costs.

- Municipalities that provide services directly are paid at the rate of 5% of total eligible operating costs; and
- Municipalities that contract for services are paid at the rate of 3% of total eligible operating costs.

MMSM will review the percentage used to calculate payments of 80% of administration costs periodically through consulation with MIPC. Participating municipalities will be notified of any changes to the percentage by MMSM.

4.3.2 Capital and Operating Costs

Payment to each municipality for capital and operating costs is based on 80% of the lesser of:

- Three year rolling average of eligible reported costs excluding administration costs less revenue; or
- Three year rolling average of the median net eligible cost for the group in which a municipality falls.

Municipalities are required, as part of the services agreement, to notify MMSM and consider MMSM's advice prior to:

- Developing, approving or implementing any change in program design or operation that may:
 - Increase the quantity of PPP collected;
 - o Increase collection and/or processing costs; or
 - Reduce material revenue;
- Preparing or issuing a request for proposals or tender for PPP collection or processing services;
- Awarding a contract to collect or process PPP from households; or
- Acquiring or modifying any capital assets.

The three year rolling average of eligible reported costs less revenue is calculated using the average of costs deemed to be eligible and the revenue reported for the three previous years. Following notification by a municipality of possible changes to a program, MMSM will provide technical assistance to the municipality during their decision-making process. Should the municipality disregard MMSM's advice and should the changes implemented by the municipality add costs to the system that would not be incurred if MMSM were to be responsible for program design and delivery, these costs will be deemed to be ineligible costs.

The three year rolling average median net cost is calculated by calculating the average of the median net eligible cost for each population group for the three previous years⁴.

4.4 Payments to Municipalities

The payment received by each municipality is based on:

Administration costs calculated as described in Section 4.3.1; plus

⁴ Municipalities operating at a cost below the 3 year rolling average median net cost receive funding at a level greater than 80% of their cost while those municipalities that are operating at a higher cost receive less than 80% of their cost, thus creating an incentive to reduce costs.

Capital and operating costs as described in Section 4.3.2.

Where the calculations described in Sections 4.3.1 and 4.3.2 result in a payment rate per tonne, the rate is multiplied by the number of tonnes collected by the municipality in the year during which costs reported in the most recently completed cost monitoring survey were incurred.

5 Plastic Bag Reduction Program

MMSM along with staff and stewards from the food, beverage and consumer goods sectors, have taken an effective combination of the 3Rs approach to the use of "single-use" plastic bags. The goal was to reduce the number of empty "single-use" plastic bags disposed in landfill by at least 50%. The primary emphasis was on the reduction of plastic bags supplied into the market. This was followed by the responsible reuse of plastic bags, and thirdly, through increased recycling opportunities for plastic bags. Some of the measures were initiated and undertaken by MMSM; other measures were undertaken by retail stores but all of these efforts have contributed to exceeding count toward the reduction goal.

5.1 Strategy

MMSM and the plastic bag stewards including retailers have taken a multi-pronged 3R approach to achieving the target set forth in the Plastic Bag Guideline.

a) Plastic Bag Reduction

Reducing the number of plastic bags supplied into the market is the single most effective measure that industry can take to reach the target. This has been achieved through the following means:

- Enhancement of opportunities to acquire reusable bags in retail stores;
- Focused in-store messaging about the benefits of reusable bags;
- Continued and increased promotion of plastic bag best practices to further reduce the number of bags provided at retail; and
- The use of a fee for plastic bags, where retailers choose to do so, as an incentive for consumers to choose reusable bags.

b) Plastic Bag Reuse

Plastic bags are commonly purchased and used to dispose of kitchen, bath, or animal wastes. Consumers are encouraged to reuse single use bags in their home or workplace rather than purchasing new plastic bags to dispose of wastes. Additionally, consumers are encouraged to reuse plastic bags for other domestic uses rather than disposing of them after a "single" use.

MMSM has partnered with Winnipeg Harvest on the Bag It Forward Program, which included the deployment and setup of 300 bins in alternate locations within communities to collect plastic bags for reuse as emergency food hampers. Any bags which are not in good condition are recycled.

Waste audit results over the past several years have shown that Manitobans are reusing single use bags in greater quantities.

c) Plastic Bag Recycling

The plastic bag recycling program has two major complementary components.

1. Plastic Bag Collection

A Plastic Bag Recycling Program has been developed which includes the collection of empty plastic bags at retail store locations. The intent of the Plastic Bag Recycling Program is to increase the number of drop-off locations to ensure that Manitobans have reasonably convenient access to plastic bag drop-off locations.

The following types of plastic bags are included in the Program:

- Plastic grocery bags;
- Plastic retail bags with string ties and rigid plastic handles removed;
- Plastic newspaper bags; and
- Plastic dry-cleaning bags.
- 2. Plastic Bag Recycling Combined with School Education

MMSM has partnered with Take Pride Winnipeg to offer a school-based program throughout the province. The program links education with direct recycling efforts, thereby creating impacts much greater than only the environmental benefits of recycling plastic bags. A significant component of the Program involves the education of school children on the benefits of reducing the use of, reusing, and recycling plastic bags.

MMSM continues to look for opportunities to work with communities and organizations to promote and educate consumers on the proper disposal of plastic bags.

5.2 Measurement

MMSM collects data from stewards to determine the actual number of plastic bags distributed in the province. Reviews of steward reports are conducted as part of MMSM's effots to ensure steward compliance, a level playing field and accuracy in reporting.

MMSM will investigate and evaluate additional opportunities to affect positive environmental impacts associated with the use of plastic bags.

5.3 Education and Promotion

MMSM will create a Promotion and Education (P&E) campaign that will educate consumers about the benefits of reducing their usage of plastic bags and of opportunities to recycle their bags. This campaign will consult with key stakeholders, including the Province of Manitoba and municipalities about the P&E program.

5.4 Reporting and Monitoring

The MMSM Annual Report will report on activities and progress made toward the Plastic Bag reduction target. This report will include activities related to plastic bag reduction, and reuse, plastic bag recycling, and industry efforts to increase the percentage of recycled content in plastic bags.

6 Promotion and Education

This section describes the promotion and education (P&E) activities that will support the objectives of the MMSM program.

The P&E program developed by MMSM will focus on two distinct communication components. The first component is identified as "operational" communication support, meaning the strategic and tactical activities required to support operational functions. The second component is identified as "consumer" P&E, which will target consumers and generators of PPP waste to participate in the Program.

The following sections describe the activities to support these two communications components.

6.1 Communication Strategy

MMSM's communication strategy is dynamic and is updated annually to ensure it incorporates continuous improvement and reflects the evolution of diversion opportunities over the life of the Program Plan. It promotes a call to action – increased recycling and diversion —directly to target audiences employing a wide assortment of tactics aimed at reaching people with messages that capture their attention, prompt them to absorb information and motivate them to adopt and maintain the desired behavior.

Activities include, for example, earned and paid media, educational programs, social media marketing and information on the MMSM website.

6.2 Operational Communications

Stewards require regular communication to help them prepare to meet their reporting and fee-payment obligations. Communication tactics include a website containing a broad range of technical information tailored to steward needs, reporting and filing guidebooks, periodic meetings/consultations, letters of notification and webinars or webcasts.

Similarly, municipalities require communication to help them meet their reporting requirements. Communication tactics include a website containing technical information tailored to municipal needs, a reporting guidebook and webinars or webcasts.

6.3 Consumer P&E

The primary goal of consumer P&E is to increase the recovery rates of PPP in community-based collection services. MMSM uses a mix of communication tools to motivate residents to adopt the desired behaviour. Key features and techniques include:

- A variety of tools to build awareness among residents about appropriate end-of-life management of PPP;
- Educating residents about the action required;
- Motivating action (providing a "call-to-action"); and
- Reinforcing and rewarding the newly adopted behaviour by providing information about the result of their action.

P&E activities are set out in a communication strategy that is reviewed and updated annually.

6.4 P&E Activities

Depending on the annual communication strategy and P&E budget, the P&E tactics could include (but not necessarily be limited to):

- Paid media— would require a moderately weighted media campaign designed to reach identified target audiences and focusing on the recycling message;
- Earned Media news releases and stories that would be disseminated throughout the year; and
- Website the MMSM website will continue to have a consumer-friendly public interface that will provide information on what can be recycled in each community, as well as general information about the benefits of recycling.

6.5 Research Support

Research is a key building block of an effective communication strategy and will be used in the development of the communication plan and to test creative concepts and messages. It also is necessary to establish the creative elements needed to generate messages that resonate with the various target audiences, triggering the desired response.

7 Program Costs and Cost Recovery

7.1 Fee-Setting Methodology

Under Regulation 195/2008 a plan for a packaging and printed paper stewardship program must include provision for the orderly collection of revenues from subscribers to the program in balance with expenditures for the program. Since year one, MMSM has employed the fee-setting methodology as detailed in its original program plan.

MMSM, along with other provincial organizations and CSSA, are currently undertaking a review of the fee setting methodology.

7.2 Annual Fee Setting

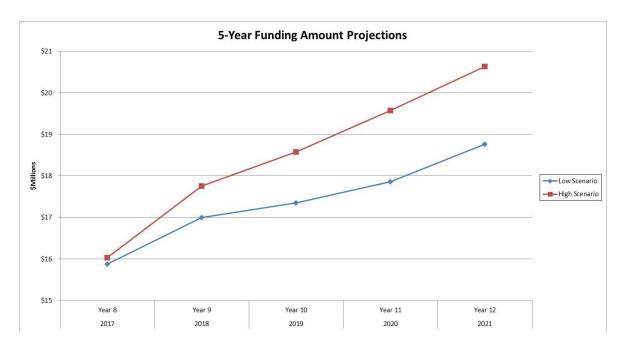
MMSM will establish steward's fees annually after municipalities have reported their costs for the previous calendar year and these costs have been verified by MMSM.

Fees for the following program year will be determined and approved by the MMSM Board of Directors before the end of October each program year.

7.3 5-Year Cost Projections

The total program cost has been projected for the five years of the Renewal Plan based on the best available information.

Scenario	2016 (act.)	2017 (est.)	2018 (est.)	2019 (est.)	2020 (est.)	2021 (est.)
Low Scenario	\$16,544,063	\$18,646,936	\$19,858,285	\$20,287,567	\$20,892,485	\$21,880,914
High Scenario		\$18,861,419	\$20,723,882	\$21,687,770	\$22,845,976	\$24,072,080



7.4 Interest and Penalties

MMSM charges interest and penalties to stewards that have not submitted fees or stewards that have not registered. Delinquent and later joining stewards are obligated from the date of obligation (April 1, 2010).

Interest and penalties received by MMSM are used to reduce the total steward fees payable in the following year. Any fees paid after the year in which they were due will also be used to reduce the total steward fees payable in the following year.

8 Program Performance Measurement and Reporting

MMSM will report annually on PPP Program performance. This information will be published in the annual report.

8.1 Recovery Rate Measurement

The recovery rate of the designated materials included in the PPP Program is measured by

dividing the total tonnage of designated PPP recovered as reported by municipalities by the total tonnage of designated PPP supplied for use by consumers in households as reported by stewards. Steward reports are supplemented by data from waste composition studies and are cross-checked with data from other similar jurisdictions.

8.2 Environmental and Economic Sustainability

MMSM will consider environmental and economic sustainability as it determines the method by which PPP is managed, such as a particular form of collection service, specific collection locations or an approach to processing.

Local processing and manufacture into new products will be promoted where both economic and environmental objectives are met.

MMSM will monitor national and international laws and regulations to ensure that the Program is in compliance.

By ensuring that the Program operates in the most sustainably efficient and effective manner, potential negative environmental impacts will be reduced.

8.3 Annual Report

In accordance with Regulation 195/2008, MMSM will provide the Minister with an Annual Report no later than 120 days after the end of MMSM's fiscal year. MMSM will report annually on PPP Program performance in its Annual Report.

Once the Annual Report is submitted to the Minister, MMSM will post the Annual Report on the MMSM website, as well as provide a printed copy of the Annual Report free of charge, upon request.

9 Stakeholder and Public Consultation

9.1 Program Plan Renewal

The Program Plan renewal submitted to the Minister for approval will include information on the consultation process, participants in the consultation process and comments received by MMSM from participants.

9.2 Ongoing

MMSM consults with stakeholders on a regular basis.

Stakeholders include:

- Stewards of designated packaging and printed paper;
- Municipalities and other service delivery agents;
- The Manitoba Government, specifically Manitoba Conservation and Green Manitoba;

- Relevant non-government organizations or agencies; and
- The general public.

Each stakeholder group receives information that is relevant to them, in a timely manner. For example, a change in steward fees will be communicated to stewards but not necessarily to the general public. In contrast, the addition of new materials will be communicated to the general public and all other stakeholders.

The primary communications vehicle will be the MMSM website, accessible to all stakeholders. The website will include information such as, but not limited to, Annual Reports, municipal costs and volume, consultation documents and feedback received during the consultation process, and plastic bag recycling information. All parties interested in a particular aspect of the MMSM decisions or activities will have opportunity to provide feedback via the website or by contacting directly the appropriate MMSM staff.

10 Governance Model

10.1 MMSM Board of Directors

MMSM is governed by a board of directors, consisting of eight industry and two unrelated independent directors. The Board provides valuable input and governance to the organization, and consists of representatives from the following sectors:

- Grocery sector
- Consumer products sector
- Alcohol and non-alcohol beverages
- Restaurants
- Retailers
- Printed paper
- Newspapers

The following associations are represented on the MMSM Board:

- Canadian Beverage Association
- Retail Council of Canada
- Manitoba Liquor and Lotteries
- Food and Consumer Products of Canada
- Restaurants Canada
- Manitoba Newspaper Group
- Dairy Processors of Manitoba
- Canadian Federation of Independent Grocers