

Questions		Answers
<b>General Questions</b>		
1.	What does EPR stand for?	EPR is the acronym for Extended Producer Responsibility. EPR shifts full responsibility to producers, making them operationally and financially responsible for establishing a province-wide reverse supply chain for the collection, transportation, consolidation, processing, and marketing of residential recyclables.
2.	Will MMSM seek a new service provider to replace services provided by CSSA/RRA in future given the new competitors emerging in Ontario?	MMSM has a Service Agreement with CSSA providing it with administrative services. CSSA has provided MMSM with written assurance that, following the transaction, all MMSM data will be held in confidence within RRA, will be used solely for the purposes of providing services under the current CSSA-MMSM Management Services Agreement, and will not be accessible to GFL. In light of MMSM's responsibility to stewards and to the broader public, MMSM will be taking further steps to consider and assess the implications of the acquisition, and in particular the control measures proposed by CSSA. In addition, MMSM will consider what further measures might be necessary to protect stewards' confidential information, ensure the continued integrity of its Conflict of Interest policies, and support healthy and open competition among recycling collection and processing service providers.
3.	Given the changes with CSSA, what are MMSM's plans to support stewards with a reporting portal, short and long term.	MMSM has a Service Agreement with CSSA and there will be no change in how stewards report.
4.	Do Stewards continue to report through CSSA or directly through MMSM?	Stewards will continue to report using CSSA's <a href="#">WeRecycle Portal</a> .
5.	MMSM will act as the sole PRO in Manitoba, however, will some producers sit on the PRO's board?	MMSM is governed by a board of directors that is comprised of seven industry and two independent directors. The board provides valuable input and governance to the organization and consists of representatives from the following sectors: Grocers, consumer products, beverages, alcoholic beverages, retailers, printed paper, and restaurants. A list of board members is on the <a href="#">MMSM website</a> and in the MMSM Annual

		Report. With any types of change to rules/fee setting, these are brought forward for consultation to stewards at the Annual Steward Meeting.
6.	Do Stewards need to register in 2021, similar to the need to register with RPRA in Ontario?	This plan does not impose any new registration activities on MMSM stewards. Stewards only need to register with MMSM. If the MMSM draft Transition Plan is approved by the Minister it will expand the definition of obligated brand owner from those with residency in Manitoba to those with residency in Canada. If you are not currently a steward or not sure if you will be obligated under the new program, please contact MMSM for assistance in determining your status.
7.	Can we talk less about what the manufacturers have to do, and focus more on what the municipalities will need to change?	The webinars are being presented to all interested stakeholders. It's important for all parties to have an understanding of the proposed changes in the draft Transition Plan.
8.	Will Manitoba residents see the opportunity to collect recyclables and get money for them?	The MMSM program makes for easy and convenient recycling for Manitoba residents, a service provided by their local governments. MMSM's draft Transition Plan lays out a process by which the producers of packaging and printed paper (PPP) will assume full operational and financial responsibility for the recycling system. The draft Transition Plan does not include the involvement of residents in the collection and sale of recyclables, however, residents do play an important role in contributing to an effective and efficient recycling program by properly sorting their recyclables for collection. In Manitoba, there are no deposits collected on materials, therefore, there isn't money to return to the consumer. A deposit program significantly increases the costs of a residential recycling programs.
9.	How can we replicate this opportunity here in Manitoba?	We recognize that a deposit system is different and while one gets a portion of the money back upon return, the net amount a consumer is out of pocket is significantly higher than the two-three cents paid in Manitoba for beverage containers in the Canadian Beverage Container Recycling Association (CBCRA) program. A deposit system would cost millions of dollars to set up. It also takes the most valuable materials out of the blue box and makes it difficult to collect other materials in a curbside recycling program without some sort of additional fee for service. The most important thing is that we make recycling convenient and inexpensive for consumers.

Obligated Party		
<p><b>10.</b></p>	<p>The definition of first sellers of a product in the province is the most straightforward when applied to appliances. Appliance manufacturers sell products through large retailers and after the product leaves the manufacturing facility or distribution center, the manufacturer is often unaware of the final destination where the product is sold. A manufacturer will, however, know the final destination of the product when it is purchased directly from its website through online sales. The complexity of distribution networks often makes it beyond the purview of the manufacturer to know where products are ultimately shipped and sold once their care and control is passed on to another entity in the distribution chain</p>	<p>The proposed definition of steward in the draft Transition Plan has been updated from the current definition in that it removes the requirement for Manitoba residency for brand holders and extends the stewardship obligations to all brand holders in Canada. In addition, the proposed definition extends the obligation of e-commerce businesses that provide a fulfilment function in the supply of designated materials to Manitoba residents to all e-commerce businesses regardless of whether or not they have residency in Canada. These proposed updates to the definition of steward are designed to help level the playing field for all producers and ensure that those businesses that are supplying designated materials to Manitoba residents are paying their fair share to manage their materials. We assume you are asking this question because the widened definition of steward means that some members of your association that do not have residency in Manitoba will now be obligated to participate in the MMSM program and may not have ready access to the volume of materials they supply to consumers in that province. While MMSM expects stewards to report their designated materials accurately, it acknowledges that not all producers are able to track the final destination of all their products. A common practice used by many stewards that face this challenge is to either work with their customers to secure data on the 'sold to' parties, or if that is not feasible, they may estimate the quantities of material supplied to each province by referencing the <a href="#">Statistics Canada Population</a> data and using their sales information to estimate the distribution of their products in Manitoba. This is an accepted methodology for preparing steward reports.</p>
<p><b>11.</b></p>	<p>If people estimate their distribution how can it be ensured that the same packaging isn't being captured more than once? On a side note, it looks like the transition will me more smooth than what is happening in Ontario – so I am happy about that part.</p>	<p>In order to ensure no double-reporting, it will be important for stewards, particularly retailers, to consult the MMSM steward list (and their own vendor lists) prior to preparing their steward report – that way they can ensure they do not report on any obligated brand owner's material. The responsibility for reporting rests with the designated steward. MMSM engages CSSA to assist with steward communications and reporting. The CSSA National Steward Services (NSS) team reviews steward reports and checks for accuracy and follows up with stewards if</p>

		verification or review is required. MMSM also asks that any estimates used in reporting are clearly and carefully explained and well supported. We ask that stewards retain records for five years to assist NSS in ensuring ongoing accuracy of reports. We believe these measures ensure the highest degree of accuracy in reporting as possible
<b>12.</b>	The consultation refers to the word "Community" throughout. How does this distinguish the responsibility assigned to an industry player for e.g., a Retailer?	In the draft Transition Plan the word 'community' refers to municipal and Indigenous communities. MMSM has adopted a broad definition of 'community' and is explained in the draft Transition Plan on page 12 to refer to "all types and sizes of populated areas with fixed boundaries and a local government such as cities, towns, villages, districts, Indigenous, Colonies." Industry players, such as retailers and manufacturers are referred to in the draft Transition Plan as stewards. Section 5 of the draft Transition Plan outlines the definition of steward for packaging and printed paper.
<b>13.</b>	What exactly does it look like to 'assume operational and financial responsibility for the residential recycling supply chain, for a business? Do you have a real-life example that would describe this for a retailer?	Currently the only other jurisdiction in North America where producers have assumed full operational and financial responsibility for the residential recycling system is in British Columbia. MMSM's draft Transition Plan envisions the implementation of a similar program in Manitoba that has operated in BC since 2014. If the MMSM draft Transition Plan is approved by the Manitoba Minister of Conservation and Climate, MMSM will on behalf of obligated producers, work with communities and service providers to deliver recycling services to Manitoba residents and manage the post-collection transportation, consolidation, processing, and marketing of these materials. The responsibility of obligated stewards will be to join MMSM, file an annual steward report and pay fees based on that report. The fees paid by stewards will cover the full cost of these services.
<b>14.</b>	Can you please explain the following: "Shifts the responsibility to producers, making them operationally and financially responsible for establishing a province-wide reverse supply chain for the collection, transportation, consolidation, processing, and marketing of residential PPP."	The MMSM team will set up a reverse supply chain for the collection, processing, and marketing of residential PPP in Manitoba. It will operate the post collection management on behalf of stewards. This effort includes management of the sale of recyclables to end markets. The commodity revenue generated by these sales reduce the fees paid by those materials responsible for generating the revenue.

	Under Full EPR, I understand the “financially responsible” part of our obligation (i.e., increase in annual MMSM fees) - but would you be able to clarify what “operationally responsible” means? How would it all work? Does this mean stewards will work with the service providers to find markets for recyclable PPP? Will stewards get returns for recyclable materials sold in the marketplace to offset some of the costs associated with the residential recycling supply chain?	There are currently seven industry related members on the MMSM board, all who provide valuable input on insight of their members priorities. MMSM will continue to work on behalf of manufacturers, retailers, and other organizations to ensure that the materials they provide to consumers are recycled and don't end up in landfill.
15.	What will be the impact of this change on steward organizations? Will costs increase?	If the draft Transition Plan is approved by the Minister, stewards will assume full operational and financial responsibility for the Manitoba residential recycling system. This will result in an increase from the current 80% financial obligation to the full system costs. Stewards can expect their MMSM fees to increase as communities transition to full EPR, currently envisioned to take place between 2024 and 2026.
16.	We are headquartered in the United States and we have a Canadian office in Ontario. We are not resident in Manitoba. We are a wholesaler; we manufacture the products in the USA and ship some of the products into Manitoba to distribution centers, which then distribute the products to retail establishments. Based on your definitions of a Steward, we don't seem to fall into any of the definitions and it would be the retail stores that would have to submit the reports. Is this correct?	MMSM is proposing a definition of obligated Steward to include the brand holder of the product if the brand holder is resident in Canada. This would expand the obligation from the current definition which requires residency in Manitoba to stewards with residency in Canada. If your organization has an office in Ontario, then your business is resident in Canada and would therefore be obligated for the designated materials supplied to consumers in Manitoba.
<b>Obligated Material</b>		
17.	Are there any exemptions for packaging like products like the ON regulation has?	The draft MMSM Transition Plan does not provide for any exemptions for any category of packaging like products.
18.	In the standard list of materials collected, when you say 'Boxboard', does this include all material that is boxboard including clothing tags, which is currently reported on today?	The standard list of materials for collection across the province presented at the webinars identifies the materials that will be collected from homes in all communities across Manitoba. This list is distinct from the list of materials on which stewards are required to report and pay fees. The Manitoba Recycling Regulation requires that stewards report and pay fees

		on all materials supplied to consumers regardless of whether they are currently collected for recycling. Boxboard is on the standardized list of materials for collection and stewards will continue to report all boxboard packaging and ancillary components made of boxboard including clothing tags.
19.	With full EPR, will commercial (ICI) recycling be included in the program? Right now, I believe that ICI recycling is not funded at all.	This draft Transition Plan and the MMSM program are for residential recycling only. It's not for Industrial, Commercial, Institutional (ICI) recycling.
20.	I'm just getting up to speed on this. What I understand is this will be only for residential recycling. If this is correct, what is the plan for business/school/health centre recycling?	The MMSM program and the draft Transition Plan are for residential material only. It's for collected materials consumers use in their homes. We suggest that questions around ICI recycling be directed to the Government of Manitoba.
21.	For major appliances specifically - typically, the company delivering the unit appliance removes most of the packaging and takes it away for recycling. The unit will then be professionally installed. The RPRA plan in Ontario allows a deduction specifically for this situation and they use appliances as the reason/example for the deduction. Will the MMSM plan allow for similar deductions? Not sure how this is currently accounted for.	MMSM does allow for this type of deduction. Stewards are required to include this material in their steward report because this material is designated packaging as it is supplied to the residential consumer but may be eligible for a deduction if the packaging is removed from the residential consumer's home and disposed of outside of the residential waste stream. The steward must have validation data such as auditable documentation from various retailers and their delivery network that supports the deduction of this material from their report. In addition, a steward is asked to complete a Deduction Declaration Form which can be found <a href="#">here</a> . More information about deductions can be found in the <a href="#">Guidebook for Stewards</a> in section 2.3.2 .
<b>Transition Phases</b>		
22.	What % of municipalities are participating in the MMSM today as it is voluntary?	95% of Manitoba's municipalities participate in MMSM's program. The 151 communities that MMSM funds includes Indigenous communities and provincial parks. You can find more information in our annual report on <a href="#">StewardshipManitoba.org</a> . Participation by communities is voluntary.
23.	How many Indigenous communities are currently part of MMSM's program?	There are currently 16 Indigenous and Metis communities that participate in the MMSM program.
24.	Would supply data be excluded for those communities that opt-out of the MMSM program?	Stewards will report the total quantities of materials supplied to the residential market in Manitoba. Although the MMSM program costs will be impacted by the total communities serviced, this has no impact on the

		quantities stewards report. Once fees are calculated, the fees are divided by the quantity of material supplied by stewards to calculate the fee rate charged for each material.
<b>25.</b>	What is the advantage of opting in versus opting out?	The draft Transition Plan proposes that municipal and Indigenous communities be provided the right of first refusal to continue to provide recycling collection services for their residents or ask MMSM to procure collection services on their behalf. MMSM will work with communities during phase two of the transition to develop service standards and cost information allowing communities to make that decision. For those communities that opt out of providing collection services, MMSM will issue an RFP and contract collection services on their behalf. MMSM believes that communities could minimize complexity of transition by retaining their current collection contracts and amending them to meet MMSM service standards but recognizes that it will be up to each community to make that decision. A community would consider various factors in making the decision including not wanting to hold the collection contract, local economic issues, and job creation.
<b>26.</b>	Are there any efforts by MMSM to support and assist Indigenous communities to participate in your program?	The MMSM team is working on a special outreach program to ensure Indigenous communities are aware of the MMSM program and the transition. We are working with both provincial and federal representatives and collaborating with other PROs to get designated materials out of northern and Indigenous communities. This is an ongoing approach to ensure communities are aware of the program.
<b>27.</b>	What will be expected as education to the resident on regards the changes that will be affecting them?	MMSM's draft Transition Plan aims for a smooth and orderly transition from the current model to full EPR with minimal disruption for Manitoba residents. If a community chooses to 'opt out' of collection the contractor providing the service would be responsible for the resident calls and the costs of that service would not be borne by the community. Experience in other jurisdictions has shown that it generally takes 3-4 months for residents to get used to contacting a new contractor for missed collection etc. There are also opportunities to explore automatic forwarding of calls related to recycling services to the MMSM resident line where the community has a phone system with this capability.

<b>28.</b>	How are you going to educate the public to new systems?	There won't be a change for consumers to the collection of their blue box materials. The change will be who will hold the contracts for the collection. Consumers can expect their blue box materials to be collected as always.
<b>Program Performance</b>		
<b>29.</b>	Hopefully GHG emission impacts are considered in the catchment design process.	Minimizing environmental impact is a primary consideration in MMSM's draft Transition Plan both in the design and sequencing of catchment areas and in the procurement of services. It is MMSM's aim to design catchments and procure services in a way that will create a logical flow of material that will maximize efficiency by increasing post-collection scale while minimizing transportation and handling which by extension minimizes cost, energy use and attendant greenhouse gases.
<b>30.</b>	How do you define the recovery target? Is it the collection target?	The recovery targets will be calculated using the sales data reported by stewards and the collected material from participating communities.
<b>31.</b>	Is current recovery performance overstated as packaging like materials are included in the recovered materials but not the supply data?	Yes, that would be a fair assessment. Currently, stewards are not required to report and pay fees on certain categories of materials such as packaging like products, but this material is being captured and managed in the recycling system. MMSM's proposal to include packaging like products as designated materials is designed to help address this issue by requiring stewards to report and pay fees on these materials which are in the system and currently unstewarded.