



Transition Plan Change Log

June 3, 2022

About this list (disclaimer): This change log identifies changes made to the draft Transition Plan MMSM submitted to the Minister of Environment, Climate, and Parks (EPC) on November 17, 2021. The changes were requested by the Government of Manitoba.

The edits below in **red** are the additions of text in the document.

Edits/additions to the draft Transition Plan	Section	Requested changes from the Department of Environment, Climate and Parks (EPC)
With the addition of the new Section 4 – Definition of a Producer Responsibility Organization all sections after Section 3 have been changed to accommodate.	Table of Contents	
Marketplace facilitator should the Packaging and Printed Paper Stewardship Regulation be so amended, means a person who:	Glossary	
Marketplace seller should the Packaging and Printed Paper Stewardship Regulation be so amended, means a person who contracts with a marketplace facilitator to supply its products.	Glossary	Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines.
Packaging-like products should the Packaging and Printed Paper Stewardship Regulation be so amended, means products...	Glossary	Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory

		amendments will be completed by specific timelines.
Producer should the Packaging and Printed Paper Stewardship Regulation be so amended, means the person who is the obligated party with respect to designated blue box material.	Glossary	
Steward means the person who is obligated with respect to designated blue box material under Manitoba’s current Packaging and Printed Paper Stewardship Regulation and as it pertains to MMSM’s current program for residential packaging and printed paper.	Glossary	Request from EPC: Please reframe any language that may result in the misinterpretation of the roles of MMSM and the department.
The Transition Plan has been developed on the premise that MMSM will continue to serve as the only producer responsibility organization (PRO) for residential packaging and printed paper in Manitoba both during and following the transition to full EPR.	Section 2.2	Request from EPC: Please reframe or remove the premise that MMSM will be the only PRO for packaging and printed paper in Manitoba.
Implementing the draft Transition Plan will be dependent upon the government eventually making amendments to the Packaging and Printed Paper Stewardship Regulation, and potentially to the Guidelines for Packaging and Printed Paper Stewardship. Given that exact timing of these amendments is not yet known, MMSM provides them here, represented as “Phase 1” of the Transition Plan, with the acknowledgement that the Transition Plan can, and likely will proceed before such amendments are completed, as follows: Regulatory Amendments MMSM recommends be	Section 2.3	Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines. Request from EPC: Please reframe any language that may result in the misinterpretation of the roles of MMSM and the department.

<p>considered by the Manitoba government:</p> <ul style="list-style-type: none"> ○ Amendment to update obligated party from ‘designated steward’ to ‘producer’. ○ Amendment to the definition and interpretation of designated materials to include packaging-like products. ○ Amendment to the definition of steward of designated materials to include brand owners resident in Canada and e-commerce marketplace facilitators. <p>MMSM recommends that the Manitoba government also consider making the following Guideline amendments:</p> <ul style="list-style-type: none"> ○ Remove the reference to 80% funding. ○ The Required Program Plan Components would need to be updated to allow for a residential recycling system fully operated and financed by producers. 		
<p>Added footnote to address the concerns about MMSM as the only PRO for packaging and printed paper.</p>	<p>Section 2.3 - Added footnote</p>	<p>Request from EPC: Please reframe or remove the premise that MMSM will be the only PRO for packaging and printed paper in Manitoba.</p>
<p>Deleted reference to regulatory amendments.</p> <p>Added definition of a Producer Responsibility Organization.</p>	<p>Section 4 – Definition of Producer Responsibility Organization (new)</p>	<p>From EPC: The proposed definition changes will also impact other stewardship programs managing products designated under the Packaging and Printed Paper Stewardship Regulation. And for regulatory consistency, the department would also need to consider updating these definitions across all</p>

		<p>stewardship regulations (e.g., definition of a steward of a designated material). This will require engagement with PROs and the steward community beyond that of just MMSM’s program.</p> <p>Request from EPC: Please reframe or remove the premise that MMSM will be the only PRO for packaging and printed paper in Manitoba</p> <p>Request from EPC: Please reframe any language that may result in the misinterpretation of the roles of MMSM and the department.</p>
<p>The definitions for packaging and printed paper are found in the Glossary in Section 1. These definitions provide general inclusions and exclusions and will eventually form part of the Rules for Stewards. Changes to these definitions, which have been the subject of stakeholder consultation and review by the MMSM Board, will require consideration and approval by the Ministry.</p> <p>Deleted reference to regulatory amendments.</p>	<p>Section 5 – Definition of packaging and paper</p>	<p>Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines.</p> <p>Request from EPC: Please reframe any language that may result in the misinterpretation of the roles of MMSM and the department.</p>
<p>Deleted reference to regulatory amendments.</p>	<p>Section 5 – Definition of packaging and paper</p>	<p>Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines.</p>

		Request from EPC: Please reframe any language that may result in the misinterpretation of the roles of MMSM and the department.
Updated the definition of Producer.	Section 6 – Definition of producer	Same as above.
Deleted reference to regulatory amendments.	Section 7 – Status and funding through transition	Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines.
Added flexibility around language for Waitlist Communities	Section 7.2 – Waitlist Communities	Request from EPC: Please add some flexibility to treatment of waitlist communities.
Added new bullet point on maintaining service standards.	Section 8.1 – Program Delivery Principals	Request from EPC: Please provide additional details in regard to MMSM’s plans to address service levels/standards throughout the transition, such as:
Deleted reference to regulatory amendments.	Section 8.2.1 – Phase 1	Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines.
Added note to direct readers to Appendix C to view sample terms and conditions, as well as requirements.	Section 8.2.2 – Phase 2	Request from EPC: Specific examples of the responsibilities that MMSM will be taking over from communities, and how this will vary between communities at each participation stage of the plan (e.g., waitlist, (non-) transitioned, participating, opt-out, etc.).
Added section – ‘ In this phase, communities will: ’ to give communities a better understanding of what’s expected from them in this phase.	Section 8.2.2 – Phase 2	Request from EPC: Specific examples of the responsibilities that MMSM will be taking over from communities, and how this will vary between communities at each

		participation stage of the plan (e.g., waitlist, (non-) transitioned, participating, opt-out, etc.).
Added more detail and simple language to this section about the role of communities in this phase.	Section 8.2.3 – Phase 3	Same as above.
Added more detail including financial and resource impacts a community could expect as MMSM takes over post-collection. Added note to direct readers to section 7.6 for more information on procurement.	Section 8.2.5 – Phase 5	Request from EPC: More information about what is meant by collection and post-collection activities, who will be responsible for post-collection activities in fully transitioned communities, and the potential financial/resource impacts.
Added section – ‘In this phase, communities will:’ to give communities a better understanding of what’s expected from them in this phase.	Section 8.2.6 – Phase 6	Request from EPC: What role communities should expect to play during the transition to full EPR?
Added new section on maintaining service standards.	Section 8.2.6 – Phase 6	Request from EPC: Please provide additional details in regard to MMSM’s plans to address service levels/standards throughout the transition, such as:
Deleted reference to regulatory amendments.	Section 12	Request from EPC: The plan should indicate how the transition will occur under the current regulatory environment. Please remove the assumption that regulatory amendments will be completed by specific timelines.
Added footnote to address the feedback received after the draft Transition Plan was submitted.	Section 14	
Changed the term ‘producer’ to ‘steward’ in various sections of the Transition Plan.	Throughout the document.	To ensure that this Transition Plan can exist under the current Regulation.
Clarified that after a community transitions to full EPR, MMSM will cease to make payments to that community under the	Appendix A	

shared responsibility model. The shared model will cease at the end of the 3-year transition period.		
Added the resin numbers to further define plastics under the designated material list.	Appendix B	