

Saskatchewan Multi-Material Recycling Program Consultation

Stakeholder Comment Form May 4, 2010

The Government of Saskatchewan is moving forward with the establishment of a province-wide Multi-Material Recycling Program (MMRP).

Please provide your thoughts on the information presented in the Consultation Paper and at the May 4th consultation event. Information about this event is available at www.mmstewardship.ca.

Your comments will be taken into account in decisions by the Joint Advisory Committee and the Government of Saskatchewan as the MMRP Regulation is created. The feedback gathered will also be considered in the design and implementation of the province-wide MMRP.

Please respond to any or all of the questions below and provide as much detail as possible. Before you begin, we encourage you to save this form to your drive, preferably with your name or company/affiliation in the file name. When complete, email your response to: comments@mmstewardship.ca.

Responses are requested on or before Friday, May 14, 2010.

Optional: Respondent Information

Name: SUMA (Contact: C.W. Chung)
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Questions and Comments

1: Under the preferred MMRP option, industry would fund 75% of the program while municipalities would cover 25%. Is this the correct arrangement? Please elaborate.

Response 1:

- SUMA believes the preferred MMRP model should be based on the Extended Producer Responsibility concept. Currently, property taxpayers cover the full cost of municipal recycling programs. We prefer the MMRP follow a process where producers accept full responsibility for the management of recycling waste. SUMA believes that industry should bear 100% of recycling cost under the program and municipal taxes should not be used to subsidize recycling operations.

2: Under the preferred MMRP option, the materials targeted include all residential packaging and printed papers except beverage containers. Are these the right materials? Please elaborate.

Response 2:

- SUMA supports in principle that all residential packaging (paper, tin, glass and plastic) and printed papers should be included in the MMRP; however, it is important to have flexibility in the system to accommodate Industrial, Commercial and Institutional (ICI) waste generated in small communities. SUMA understands the reasons to exclude ICI waste from the MMRP, but we also believe that the program needs to exempt smaller municipalities that do not have local private contractors providing ICI recycling services. We believe that a population threshold would be a

good way to allow small municipalities to continue to provide ICI services without hindering private recyclers in larger centres.

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

Response 3:

- SUMA agrees municipalities should remain in full control of service delivery. This includes the ability to set levels of service, collection points and manage all aspects of recycling management.
- The Ministry of Environment has not defined the objectives of the MMRP. Efficiency and effectiveness are related but represent very different goals. Efficiency focuses on the lowest cost per household, while effectiveness focuses on return rate. SUMA believes program design cannot begin until the ministry clarifies the objective of MMRP.

4: Under the preferred MMRP option, the program would be governed by the Board of Directors of a Stewardship Responsibility Organization (SRO) made up of Industry representatives. An Advisory Committee consisting of Municipalities, Industry, an Environmental Non-government Organization (ENGO), and the Government of Saskatchewan (observer) would consider and provide direction on important decisions such as funding changes. The Advisory Committee would provide overall recommendations on the program directly to the SRO Board. Is this the right governance model? Please elaborate.

Response 4:

- SUMA believes that if the preferred MMRP option is based on cost sharing of 75% industry and 25% municipalities, the Board of Directors of the Stewardship Responsibility Organization (SRO) must have municipal representation to reflect the funding arrangement. Under our preferred arrangement, with industry being responsible for 100% of the cost, that level of representation would not be necessary.
- SUMA agrees the MMRP Advisory Committee is an essential part of functional governance and we see that other ad hoc technical committees can be created under the Advisory Committee to provide expert opinions. However, the ministry has not clarified the working relationship between the SRO and the Advisory Committee and if the governance structure will allow technical sub-committees.

5: Under the preferred MMRP option, the obligated parties would be (in order of precedence): resident Brand Owner, First Importer into Saskatchewan, or Voluntary Steward. Is this the right approach? Please elaborate.

Response 5:

- SUMA sees this as the right approach to the MMRP.

6: Under the preferred MMRP option, each municipality with a population of 25,000 and over would receive funding for a curbside collection program, while smaller municipalities would receive funding to operate depot-based programs. Municipalities would nonetheless have the choice of providing a higher level of service, provided they were willing to pay the incremental costs. Is this the right approach? Please elaborate.

Response 6:

- SUMA strongly believes that municipalities should determine the levels of service for recycling. Every municipality is unique and a MMRP program needs to reflect that.
- It is unclear to us why the ministry chooses to fund municipalities with a population of and over 25,000 differently than the rest of municipalities. Is this a way of setting different diversion targets for cities and towns? What does the ministry hope to achieve through curbside recycling in larger centres?

7: According to the tentative timeline that has been presented, the MMRP Program Plan would be approved by the Minister of Environment by January 2011, and, assuming this plan is approved, the program would commence on June 1, 2011. Are these the right timelines? Please elaborate.

Response 7:

- SUMA understands that the Ministry of Environment wants to move quickly on the MMRP; however, we feel that this ambitious timeline needs to include a reasonable timeframe for public consultation. For example, SUMA only had nine days to comment on the preferred MMRP model after the first consultation. This is not enough time for us to properly inform our members and provide meaningful comments.
- SUMA also finds that not enough information was provided on May 4th and is concerned that the ministry already has a plan, and is just looking for 'confirmation' from stakeholders. An example of this is that the ministry has already determined service levels for municipalities with population over 25,000. If the ministry wants to design a long-term successful recycling program in Saskatchewan, it is important that stakeholders are truly consulted and their input is reflected in the outcome.

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

Response 8:

- SUMA sees a Joint Advisory Committee with municipal representation as the correct approach to build consensus among different stakeholders. This will ensure the MMRP program plan reflects the needs of industry, municipalities and non-governmental organizations.

9: Please share with us any other comments you wish to provide.

Response 9:

- SUMA believes the preferred MMRP model needs to have technical and financial support for small municipalities to begin offering basic recycling services. Furthermore, it is important the program explores alternative recycling solutions for remote communities in both Southern and Northern Saskatchewan. Many isolated municipalities are unable to sustain a recycling program due to high transportation costs. The preferred MMRP model needs to address this pressing issue.