

Impacts on Current Program and Engagement Response

The following discussion provides the anticipated impacts for the City and our residents as well as the response planned for the engagement submission.

Resident/User Experience

The regulations will have an impact on the current residential recycling programs. The exact impacts will not be known until the producer responsibility organization has an approved program plan. At a minimum, the City will want to see the Ministry of Environment uphold its intention to “preserve the integrity of residential recycling while ensuring uninterrupted collection service to residents”.

The City’s response to the engagement will include a resident-centred perspective to ensure that the regulations and program plan will be optimized for residents. The City will rely on our bi-annual residential waste and recycling survey to highlight levels of satisfaction with current service levels and suggested program improvements. Through the City’s experience as an operator of residential recycling programs, there are also many resident-facing program implications that would need to be considered if the City were no longer responsible for recycling collections. This includes, for example, the coordination of routes with the City’s garbage and organics collections and service changes due to construction. The City’s engagement response will detail these considerations. Some packaging materials that are part of other stewardship programs, such as paint and oil, are excluded from the packaging materials in these regulations. This will continue to be difficult to educate residents on and can hopefully be mitigated through coordination of stewardship organizations.

It is not clear what the different definitions for single unit dwelling and multi-unit residential dwelling are in the regulations and how they might align with the City’s program definitions. As well, the regulations are silent on how mixed-use properties and residential-like properties like care homes, may be addressed. If it is inconsistent with how the City provides waste services, it has the potential to cause confusion and frustration for residents who are not likely to understand that there are different operators of their waste collection programs.

With the full producer responsibility program for paper and packaging, residents are likely to see a number of benefits. All residents should see the elimination of the recycling fee from their utility bills. The summary and draft regulations also point to some service level enhancements, including expanded materials that are accepted and the potential to include staffed recycling depots in the program, as well as the addition of schools and outdoor public spaces. Residents are expected to be less frustrated by greater consistency in accepted materials across the province.

There may also be changes to the recycling collection programs over time, such as the elimination of single stream recycling and a move to separating materials prior to collection. This would be less convenient for residents but has been demonstrated to lower contamination rates.

City Operations

The regulations will have an impact on the City's recycling program operations. Similar to the impact for residents, the exact impacts will not be known until the producer responsibility organization has an approved program plan. At a minimum, the City will see the current arrangement with MMSW to operate residential recycling programs phased out and a new program phased in.

The City's residential recycling programs include collections, processing and material marketing all operated by third parties; therefore, the City will be very interested in the Ministry of Environment's commitment to "minimize disruption of existing municipal contracts with third parties" and what that transition looks like. The current Curbside Residential Recycling contract with Loraas Disposal North is in place until the end of 2027 with options to renew beyond that period and the Multi-Unit Residential Recycling contract with Cosmopolitan Industries is in place until the end of 2023, with available options for renewing. Whether the producer responsibility organization will want to explore the ability to take over existing contracts or if municipalities will need to wait for contracts to expire before the transition begins is not known.

Recycling depots are likely to be a component of the new program plan. The City's current agreement with MMSW provides no financial compensation for operating the recycling depot program over what is provided for the collection programs. A number of the materials that are being added to Saskatchewan's regulations could be received through staffed depots (similar to BC) rather than curbside collections. The specific materials that will be collected and the depot service levels will be defined in the program plan. This could be an opportunity to utilize Recovery Park and receive stewardship funds to offset operating costs for materials that are already planned to be collected or the additional materials that are proposed to be added. The draft regulations do not include items from the Industrial, Commercial and Institutional sector, which currently end up in our depots. Resolution on this matter remains outstanding. The timing for the Recycling Depot Review action from the *Solid Waste Reduction and Diversion Plan* will be adjusted after the program plan details are available so that a recommendation on the future of recycling depots can account for this likely significant change.

The addition of schools and outdoor public places like public parks, playgrounds or sidewalks are proposed to be added. Currently, schools in Saskatoon will need to comply with the Industrial, Commercial, and Institutional waste diversion bylaw. The City will share the requirements with the provincial government, to ensure they are aware of what the bylaw requires. As noted in the Integrated Waste Management Report, there is very limited recycling offered in outdoor public places by the City and very low diversion from the program that does exist. Changes to waste containers and collections for those areas would affect a number of City departments and partner organizations (such as Business Improvement Districts). The City's response will include a request to make sure those groups are included in the next phase of engagement and program development by the producer responsibility organization.

The City's Waste Bylaw No. 8310, would require an amendment with the start of the new product stewardship program to reflect the changes. There would be many points that require clarification, such as enforcement responsibilities, illegal dumping or non-acceptable materials in containers, cart or container requirements, and nuisance issues. It is not known how recycling enforcement that may need to be carried out by the City would be resourced in a new product stewardship program. It is also not clear how discrepancies between City bylaws and the program that results from these draft regulations would be resolved, especially if the bylaws were more stringent.

Education and communications for recycling have been included in the draft regulations. It is unclear to what extent it would transition from the City to the producer responsibility organization. The City has invested considerably in a waste brand over the past few years that is grounded in the behaviour change principles in the *Solid Waste Reduction and Diversion Plan*. In the response, the City will encourage the producer responsibility organization's program to include behaviour change approaches since providing information alone is often inadequate.

Generally, the City supports the expanded list of program materials; however, the inclusion of plant-based plastics raises questions about whether compostable or biodegradable plastics will be included in the regulations and the future product stewardship program. The focus of the draft regulations is silent on organics processing as an option for these materials. With the addition of single use items to the materials in the draft regulations and the additional work being carried out by the federal government on banning single use plastics, compostable and biodegradable plastics are expected to increase in prevalence. The City's planned curbside organics program is launching in 2023. It is highly likely, with the City program accepting BPA certified compostable plastics, that household packaging and paper products covered by these regulations would end up in the City's program as either accepted material or contamination. The City would like to see compensation for paper and packaging products that are processed and measures to mitigate contamination. Other packaging materials that are emerging like textiles and synthetic fibres are also not included.

The draft regulations do not address materials that are included in the regulations but end up in the residential garbage program that the City operates. The City's 2019 Waste Characterization Study estimated that approximately one-third of paper, cardboard, plastic, metal, and glass that the curbside residential sector generates was landfilled. There is an expense to the City to manage these materials. In the current approach, where the City is responsible for both recycling and garbage programs, this externality is absorbed through the residential mill rate. In a full extended producer responsibility program, the City would like to see compensation for the paper and packaging materials that are improperly disposed of and measures to minimize the quantity of these materials that the City is required to handle. This will be even more important to residents as the City moves to a variable rate curbside garbage program, where residents may directly see their personal costs increase if the packaging and paper product stewardship program is unable to capture all materials because they continue to not be designed to be recyclable.

Environmental Outcomes

The current regulations and product stewardship program do not have targets. The draft regulations includes that the producer responsibility organization propose targets and that there is independently audited performance reporting. The City supports this move and would like to see targets that are regional rather than province-wide to ensure continued environmental progress where there are more mature recycling programs and better data to support target setting, which Saskatoon has available.

In 2021, the City's recycling programs diverted 11,008 tonnes of material and contributed 11.7% to the City's waste diversion rate of 24.7%. The City has a target of 70% waste diversion. The calculation only includes City-run waste programs. The *Solid Waste Reduction and Diversion Plan* proposes expanding this to include other diversion programs offered to the community by other organizations. To do this, the City will require Saskatoon-specific data from all stewardship programs, including packaging and paper. The City has the longer-term greenhouse gas reduction targets for the waste sector equivalent of reduction and diversion rates of 95% for plastics and 90% for paper. Saskatoon specific data will also be required for our annual greenhouse gas inventories and to monitor Low Emission Community Plan progress.

Impacts on the City as A Producer

The City is also considered a producer under the draft regulations. None of the proposed changes on who is obligated to be a producer are expected to impact the City. The main anticipated impact is a more extensive reporting requirement with additional materials being added and an ongoing increase in annual payment to cover the stewardship program costs. The City is integrating the reporting work into the Green Teams and Leading by Example project, since this could be a waste reduction and cost savings opportunity.

City Participation in the New Product Stewardship Program

The draft regulations references creation of an advisory committee by the producer responsibility organization. The City would like to be on this committee or otherwise have a similar role working with the producer responsibility organization given our current role operating recycling programs and the City's leadership role in waste reduction and diversion in Saskatchewan.

The draft regulations do not include a clear mechanism for residents or municipalities to dispute the service levels that the provincial government and producer responsibility organization negotiate. In the regulations, public and stakeholder consultations are required by the producer responsibility organization but there is nothing that spells out how they will be utilized in the development of the product stewardship program. The City encourages the Ministry to also require evidence to show how the results were incorporated into the product stewardship program's final design.

During the webinar held by the Saskatchewan Waste Reduction Council the municipal experience from British Columbia described the program offer as a "take it or leave it"

option for municipalities. It appears that there will be little recourse if the product stewardship program does not meet expectations. There is a risk that if the program is not meeting expectation, the City may need to offer an enhanced service level (similar to how we offer an enhanced service level of Household Hazardous Waste materials that are collected above and beyond what is regulated) or that the City will see regulated materials landfilled. The City will need to monitor landfilled materials through waste characterization studies and ensure that the provincial government and producer responsibility organization are aware of the quantities of materials not captured through the product stewardship program.

Other Implications

The City is currently implementing an Assisted Collection program for curbside waste collection programs. The City encourages the provincial government and producer responsibility organization to offer an equivalent service.

The City recommends that the Ministry of Environment consider including safety as an additional reporting requirement since the waste industry has some of the highest level of safety incidences in North America.

It is not known what the impacts may be for either Loraas North Disposal or Cosmopolitan Industries, both who are employers in the City. As a social enterprise, Cosmopolitan Industries also offers social benefits through their programs.