



ASSOCIATION OF MANITOBA MUNICIPALITIES

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February 26, 2007

Manitoba Conservation
Pollution Prevention Branch
123 Main Street, Suite 160
Winnipeg MB R3C 1A5

**RE: PROPOSED STEWARDSHIP REGULATION GUIDELINES AND
PACKAGING AND PRINTED PAPER STEWARDSHIP
REGULATION**

The Association of Manitoba Municipalities (AMM) believes that recycling is an important process that needs to exist in order for communities to be environmentally, socially and politically responsible. This is why the proposed Stewardship Regulation Guidelines for Product Stewards in relation to the Packaging and Printed Paper Stewardship Regulation is an important issue to the AMM and all municipalities in Manitoba. The AMM appreciates the effort that has gone into the drafting of the regulation and appreciates the opportunity presented to raise some issues concerning program coverage area, timelines, consultations and complexity.

Recycling is an important value for many Manitoba's residents, however the proposed change to an Extended Producer Responsibility (EPR) model should ensure that coverage does not decrease and that recycling programs continue in all areas of the province. The management of land and resources will determine the quality of life for residents now and in the future. Newly developed programs will need to extend to all municipalities within the province to ensure that recycling services are constantly in place. Any targets set for industry to reach in recovery efforts need to ensure that all areas of the province are served and current levels of service are maintained and improved.

Industry funded operations (IFO) will be the method used to make the extended producer responsibility model a reality. The IFOs will be given an allotment of time to develop business plans for their specific waste stream. Program plans will need to be developed in a thorough and timely manner to ensure that Manitobans continue to receive quality service. This development process must flow smoothly to ensure that the proposed program plans can be communicated to municipalities and local issues can be worked through.

*Representing
Manitoba's
Municipalities*

The AMM is concerned that the IFO consultation process will not be as cohesive and sensitive to municipal concerns as previous consultation processes held through the Manitoba Product Stewardship Corporation (MPSC) board. The AMM holds two positions on the MPSC board, thereby securing a venue to voice municipal concerns. We understand that the IFO process will involve consultation requirements and would like to ensure that the AMM will be involved in all consultations. We also feel the need to be part of the overall steering committee due to the importance of municipalities within the system.

The Province needs to clarify the conflict resolution process in the event that the AMM or a municipality have concerns with a proposed program that is not adequately represented by the IFO following the consultation process. As well, the Stewardship Regulation Guidelines for Product Stewards in relation to the Packaging and Printed Paper Stewardship Regulation indicates that program plans can be amended with approval from the Minister. Amendments to the program plan should require additional consultation with municipalities given the direct connection between program implementation and municipal service delivery. The AMM would like to focus on cooperative approaches, however the conflict resolution and amendment processes need to be made clear so there are actions that can be taken by any stakeholder if problems arise.

The AMM also has concerns with the new system being divided between two departments, and therefore two ministers. The regulation and guidelines do not indicate which minister will be responsible for all approvals. This has the opportunity to increase complexity and confusion when conflict arises through the development and implementation processes. Green Manitoba Eco-Solutions, reporting to the Department of Science, Technology, Energy and Mines, has a natural role to play in working with all stakeholders, yet the Department of Conservation is legislatively responsible. Clarification is required to ensure that municipalities are aware which political figure and department staff they should address with comments, questions and concerns. Defining the process, including responsible parties, should be at the forefront of this initiative.

The AMM understands the complexity of moving to a new industry-responsible system and are pleased to see that mandatory consultations are included in the process to develop program plans. However municipalities are a huge stakeholder in this initiative and municipal concerns must be addressed for this program to be successful. If you have any additional questions or concerns, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Bell". The signature is fluid and cursive, with the first name "Ron" and the last name "Bell" clearly distinguishable.

Ron Bell
President