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## 1.0 Introduction

*This Stewardship Plan is being submitted to Recycle NB on behalf of the brand owners who have selected Circular Materials Atlantic to act as their agent in compliance with the Designated Materials Regulation under the Clean Environment Act (the “Regulation”) for Packaging and Paper.*

## 2.0 The Stewardship Agency

*Circular Materials is a federally incorporated not-for-profit organization established to support producers with meeting their obligations under extended producer responsibility (EPR) regulations across Canada.*

*The organization’s mandate is to support producers by harmonizing compliance services and developing recycling supply chains that return materials back to producers for use as recycled content in new products and packaging.*

*Circular Materials was founded by 17 of Canada’s leading food, beverage and consumer products manufacturers, restaurants and retailers. CM’s board is comprised of representatives from each of the organization’s corporate members<sup>1</sup>.*



*Circular Materials has established a sound governance model and the policies and procedures by which it operates treat and represent all producers in a procedurally fair, transparent and non-discriminatory manner irrespective of their size or nature of their business.*

<sup>1</sup> CM’s board is comprised of representatives from each of the organization’s corporate members: Costco Wholesale Canada Ltd., Coca-Cola Bottling Limited, Empire Company, Kraft-Heinz Canada, Keurig Dr Pepper Canada, Lassonde Industries Inc., Loblaw Companies Limited, Maple Leaf Foods, McDonald’s Restaurants of Canada Limited, Metro Inc., The Minute Maid Company Canada Inc., Nestlé Canada, PepsiCo Canada, Procter & Gamble Inc., Recipe Unlimited, Restaurant Brands International (RBI), and The Clorox Company of Canada Inc.

*Circular Materials has registered the trade name Circular Materials Atlantic to operate in New Brunswick, Nova Scotia, Prince Edward Island and Newfoundland and Labrador.*

*Circular Materials Atlantic complies with the criteria for an agent to act on behalf of obligated brand owners in New Brunswick established by Recycle NB:*

- *Circular Materials is incorporated federally as a not-for-profit organization and has registered the trade name Circular Materials Atlantic to operate in New Brunswick;*
- *Circular Materials' mandate is to represent any producer that seeks to meet its obligations under extended producer responsibility (EPR) regulations across Canada;*
- *Circular Materials is governed by brand owners and is committed to robust, transparent and representative governance by brand owners;*
- *Circular Materials' mandate is to represent producers to meet their obligations under extended producer responsibility (EPR) regulations across Canada;*
- *Circular Materials has the abilities, skills and qualifications to diligently and professionally represent its subscribing brand owners;*
- *Circular Materials is providing and will continue to provide services in New Brunswick in English and French;*
- *Circular Materials will act on behalf of any brand owner obligated under the Regulation who executes a services agreement with Circular Materials;*
- *Circular Materials is committed to providing compliance services to its subscribing brand owners on fair and equitable terms; and*
- *Circular Materials is free of any real or perceived conflict of interest with any portion of its duties as an agent to brand owners.*

### **3.0 Context for Development of a New Brunswick Packaging and Paper Stewardship Plan**

#### **3.1 Residential Collection Systems**

*Currently, New Brunswick municipalities provide solid waste curbside collection services to most single-family households and certain multi-family buildings. Municipalities use differing criteria for services to multi-family buildings by number of units, ranging from four to twelve units. Curbside collection of waste is typically weekly but may occur biweekly in some smaller communities.*

Similarly, municipalities provide recycling curbside collection services to some single-family dwellings and multi-family buildings. For much of the province this curbside collection service takes place on a biweekly or monthly schedule, with some of the larger centres offering weekly curbside collection service. Where municipalities provide biweekly garbage and recycling services, these typically occur on alternate weeks. Some municipalities co-collect recyclables with garbage in separate compartments of the collection vehicle.

The following table sets out the available data for the number of households receiving collection of packaging and paper.

**Table 3.1 Households Receiving Recycling Collection Service**

Regional Services Commissions		Residences	
#	Name	Total <sup>2</sup>	Receiving Collection of Paper and Packaging
1	Northwest Regional Service Commission	28,446	20,829
2	Restigouche Regional Service Commission	11,300	11,300
3	Chaleur Regional Service Commission	17,973	17,973
4	Peninsule Acadienne Regional Service Commission	21,394	17,500
5	Greater Miramichi Regional Service Commission	8,666	8,666
6	Kent Regional Service Commission	13,492	13,492
7	Southeast Regional Service Commission	84,928	69,385 <sup>3</sup>
8	Regional Service Commission 8	13,830	10,269
9	Fundy Regional Service Commission	49,094	10,500 <sup>4</sup>
10	Southwest New Brunswick Service Commission	14,970	11,000
11	Regional Service Commission 11	60,940	36,698
12	Western Valley Regional Service Commission	16,925	12,590
Totals		341,958	240,202

<sup>2</sup> Source: RSC where provided, otherwise Statistics Canada.

<sup>3</sup> Westmorland and Albert Counties

<sup>4</sup> Saint John is planning to introduce curbside collection service in 2022 which will increase the number of households by 22,000.

*In some municipalities, curbside collection services are complemented by drop-off depots or mobile collection events that accept packaging and paper.*

*Where curbside recycling collection services are not provided, some municipalities offer drop-off depots or mobile collection events that accept packaging and paper.*

*The following table sets out the number and locations of depots accepting packaging and paper from residents.*

**Table 3.2 Drop-Off Depots Accepting Packaging and Paper**

<b>Regional Services Commissions</b>		<b>Depots Accepting Paper and Packaging from Residents</b>	
<b>#</b>	<b>Name</b>	<b>Number</b>	<b>Locations</b>
1	Northwest Regional Service Commission	0	
2	Restigouche Regional Service Commission	1	Arran Street, City of Campbellton
3	Chaleur Regional Service Commission	0	
4	Peninsule Acadienne Regional Service Commission	1	Dépôt Recyclage, 276 rue Industrielle, Tracadie-Sheila
5	Greater Miramichi Regional Service Commission	6	Recyclage Kent Recycling, 10255 Route 134 Saint Louis De Kent Hebert's Bottle Exchange & Scrap Metal 293 Wellington Street Miramichi Breau Disposal Ltd Miramichi Fero Waste & Recycling 1300 Berry Mills Road Miramichi MDI Waste Services Miramichi Doran's Recycling Ltd 390 Radio Street Miramichi
6	Kent Regional Service Commission	Mobile only	Mobile Eco-Depot serving 9 locations throughout the year
7	Southeast Regional Service Commission	9 plus Mobile	9 depots for glass (sorted clear/colour):

Regional Services Commissions		Depots Accepting Paper and Packaging from Residents	
#	Name	Number	Locations
			<p><i>Eco360's Facility - 100 Bill Slater Drive, Berry Mills</i></p> <p><i>Beaubassin-est - Salle Grand-Barachois, 1455 Route 133, Grand Barachois</i></p> <p><i>Cap-Pelé - Arena Parking Lot, 54 Arena Road</i></p> <p><i>Dieppe - Dieppe Market Parking Lot, 232 Gauvin Rd.</i></p> <p><i>Memramcook - Eco-Vision Memramcook - 280 Old Shediac Rd</i></p> <p><i>Moncton - Moncton Public Works, 100 Worthington Ave</i></p> <p><i>Riverside-Albert - Rec Centre, 9 Bicentennial Drive</i></p> <p><i>Riverview - 200 Robertson St.</i></p> <p><i>Sackville - Tantramar Veterans Memorial Civic Centre - 182 Main St.</i></p> <p><i>Shediac - Festival Arena Parking Lot, 84 Festival Street</i></p> <p><i>Mobile Eco-Depot serving different locations each week</i></p>
8	<i>Regional Service Commission 8</i>	0	
9	<i>Fundy Regional Service Commission</i>	10	<p><i>Crane Mountain Landfill</i></p> <p><i>Grand Bay-Westfield / Welsford</i></p> <p><i>Saint John East</i></p>



Regional Services Commissions		Depots Accepting Paper and Packaging from Residents	
#	Name	Number	Locations
			<ul style="list-style-type: none"> <li>- Atlantic Superstore, Rothesay Ave</li> <li>- McAllister Place Mall</li> <li>- Saint John Airport, Loch Lomond Road</li> </ul> <p>Saint John North</p> <ul style="list-style-type: none"> <li>- Sobeys, Lansdowne Avenue</li> <li>- 100 Boar's Head Road</li> </ul> <p>Saint John West</p> <ul style="list-style-type: none"> <li>- Baxter Cold Storage Plant, King William Road, Lorneville</li> <li>- Lancaster Mall, Fairville Boulevard</li> </ul> <p>Hampton</p>
10	Southwest New Brunswick Service Commission	0	
11	Regional Service Commission 11	8	<p>Fredericton (3 locations)</p> <ul style="list-style-type: none"> <li>- 232 Rookwood Ave</li> <li>- Brookside Mall</li> <li>- Willie O'Ree Place</li> </ul> <p>Oromocto (3)</p> <ul style="list-style-type: none"> <li>- Oromocto Market Superstore</li> <li>- Gateway Mall</li> <li>- Freemans's Convenience Store</li> </ul> <p>Minto/Chipman (1)</p> <ul style="list-style-type: none"> <li>- 80 Logue Road</li> </ul> <p>Fredericton Regional Solid Waste Facility (1)</p> <ul style="list-style-type: none"> <li>- 1775 Alison Blvd</li> </ul>
12	Western Valley Regional Service Commission	8	<p>Southern Valley Transfer</p> <p>7 drop off locations throughout the RSC</p>

The following table sets out the types of packaging and paper accepted in recycling collection systems. Note that some RSCs accept items in their recycling collection systems that are not included in the definitions of packaging, packaging-like products and paper.

**Table 3.3 Packaging and Paper Accepted in Collection Systems**

#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
1	Northwest Regional Service Commission	Paper Boxboard Corrugated cardboard Aseptics Plastics (1-5, 7) Aluminum (plates and foil), Tin cans, metal and aluminum cans	# 6 – styrofoam, Containers with no recycling symbol Wrappers Plastic bags (for chips, cereal) Cylinders/pressurized containers Pool liners, Glass, Appliances, Paint cans
2	Restigouche Regional Service Commission	Paper Cardboard Plastics (1-5, 7) Aluminum (plates and foil) Tin cans, metal and aluminum cans	No glass No #6 plastic No paint cans, pressurized containers
3	Chaleur Regional Service Commission	Plastics (1,2,4,5,7) Paper and Cardboard Metals (Tin/aluminum) Waxed cardboard and aseptics	Containers and items of plastic #3 & #6 Glass and dishes Styrofoam (transportation of electronic products, meat trays, cups, etc.) Clothing and footwear Computers, TVs, cell phones, and other old devices Hazardous waste (paint, oil, antifreeze, gasoline, cleaners, batteries, etc.) Plastic bags (grocery bags, plastic film, canvas, tarpaulin)

#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
			<p><i>Watering hoses, extension cords, clothesline, rope</i></p> <p><i>Building materials (plumbing pipe, wood, windows, siding, etc.)</i></p> <p><i>Items made with different type of materials (e.g. plastic and metal assembled)</i></p> <p><i>Refuse, food, diapers, etc.</i></p>
4	<p><i>Peninsule Acadienne Regional Service Commission</i></p>	<p><i>Paper and Cardboard:</i></p> <ul style="list-style-type: none"> <li>• <i>Books (without spiral binding)</i></li> <li>• <i>Cardboard boxes: frozen food, cereal, pizza, laundry detergent, etc.</i></li> <li>• <i>Cardboard tubes and rolls</i></li> <li>• <i>Egg cartons</i></li> <li>• <i>Envelopes with or without windows, file folders, calendars (without spiral binding) and brochures</i></li> <li>• <i>Flattened corrugated cardboard (moving boxes)</i></li> <li>• <i>Flyers (Note: Plastic bags are not recyclable.)</i></li> <li>• <i>Invoices, receipts, lottery tickets and playing cards</i></li> <li>• <i>Newspapers, catalogues, journals, phone books, magazines and posters</i></li> <li>• <i>Sheets of paper, glossy paper and kraft paper (brown paper bags)</i></li> <li>• <i>Shredded paper (in a cardboard box or paper bag)</i></li> <li>• <i>Tetra Pak-type aseptic containers (juice cartons)</i></li> <li>• <i>Waxed milk or juice cartons and frozen juice containers (Note: Caps and containers must be placed separately in the bin.)</i></li> </ul> <p><i>Plastics (1-5, 7):</i></p>	<ul style="list-style-type: none"> <li>• <i>Animal food bags</i></li> <li>• <i>Cardboard coffee cups</i></li> <li>• <i>Carbon paper</i></li> <li>• <i>Facial tissue</i></li> <li>• <i>Large household items/children’s toys</i></li> <li>• <i>Potato sacks</i></li> <li>• <i>Soiled cardboard</i></li> <li>• <i>Soiled food wrap or damp paper (wet paper towel)</i></li> <li>• <i>Wrapping paper</i></li> <li>• <i>Wax paper</i></li> <li>• <i>All types of plastic bags: grocery, milk, bread, Ziploc, etc.</i></li> <li>• <i>Biomedical products: syringes, needles, etc.</i></li> <li>• <i>CD cases</i></li> <li>• <i>Food packaging: potato chips, meat</i></li> <li>• <i>Garden hoses</i></li> <li>• <i>Individual yogurt containers (small containers)</i></li> <li>• <i>Motor oil, turpentine, gasoline or other hazardous product containers</i></li> <li>• <i># 6 plastic containers</i></li> <li>• <i>Nylon cord, clothesline</i></li> <li>• <i>Plastic utensils and glasses</i></li> <li>• <i>Plastic wrap (e.g. Saran Wrap)</i></li> <li>• <i>Styrofoam/Styrofoam packaging</i></li> <li>• <i>Toys made from several materials</i></li> <li>• <i>Vinyl siding</i></li> <li>• <i>Car parts</i></li> <li>• <i>Construction materials (metal)</i></li> <li>• <i>Metal coat hangers, wire and clasps</i></li> <li>• <i>Paint and paint stripper cans</i></li> <li>• <i>Pieces</i></li> </ul>

#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
		<ul style="list-style-type: none"> <li>• Fast-food containers</li> <li>• Fruit containers: strawberries, raspberries, blueberries, etc.</li> <li>• Large yogurt containers</li> <li>• Liquid laundry detergent, dishwashing liquid, bleach, etc., bottles and jugs</li> <li>• Oil and vinegar bottles</li> <li>• Plastic containers with the numbers 1, 2, 3, 4, 5 and 7 (# 6 is not accepted)</li> <li>• Tupperware containers, plastic baby bottles, 20-litre plastic bottles, water jugs</li> <li>• Water, juice, milk, soft drink, etc., bottles</li> <li>Aluminum:               <ul style="list-style-type: none"> <li>• Aluminum cans and bottles</li> <li>• Aluminum foil</li> <li>• Aluminum plates and containers</li> <li>• Covers and lids</li> <li>• Tin cans (with or without labels)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>of metal</li> <li>• Pressurized containers (aerosol cans)</li> <li>• Scissors, nails, screws, tools, etc.</li> <li>No glass</li> <li>• Dishes and china</li> <li>• Fibreglass</li> <li>• Jars and bottles</li> <li>• Light bulbs, compact fluorescent bulbs (spiral) and fluorescent tubes (mercury vapour lamps)</li> <li>• Mirrors</li> <li>• Pottery</li> <li>• Pyrex</li> <li>• Window panes</li> </ul>
5	Greater Miramichi Regional Service Commission	<ul style="list-style-type: none"> <li>Paper</li> <li>Cardboard</li> <li>#1 plastic (PETE) containers</li> <li>#2 plastic (HDPE) containers</li> <li>#4 plastic (LDPE) containers</li> <li>#5 plastic (PP) containers</li> <li>#7 plastic (OTHER) containers</li> <li>Paper cups</li> <li>Metal food can</li> <li>Milk cartons</li> </ul>	<ul style="list-style-type: none"> <li>Glass bottles</li> <li>Styrofoam # 6</li> </ul>
6	Kent Regional Service Commission	<ul style="list-style-type: none"> <li>Plastics: Cups and dishes, Bottles (caps off), Medicine bottles (empty), Hard plastic containers* (covers off), Milk containers (jugs and bags / rinsed), Jugs (rinsed) Plastic bags (empty), Grocery bags, Bread bags, Sandwich bags</li> </ul>	<ul style="list-style-type: none"> <li>Plastic #6</li> <li>Glass</li> </ul>

#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
		<p><i>*Accepted hard plastics numbered: 1, 2, 3, 4, 5 &amp; 7.</i></p> <p><i>Paper and cardboard: Phone books, Paper plates, Boxes (all kind), Cereal boxes, Pizza boxes (no wax paper), Calendars Cards/Catalogues/Magazines, Egg cartons, Milk cartons (rinsed), File folders , Flyers/Posters, Envelopes, Books/Reports, Wrapping paper, Newspapers, Drink trays, Paper towel rolls, Paper bags, Coffee cups</i></p> <p><i>Metals: Aluminum plates, Aluminum cans, Bottles and cans (steel, tin and aluminum), Pots and pans, Aerosol cans (empty), Aluminium sheets, Utensils</i></p> <p><i>Other Items: Caps and covers, Frozen juice cans, Styrofoam (meat trays, cups, plates, etc. / rinsed)</i></p>	
7	Southeast Regional Service Commission	<p><i>Metals: Aerosol Cans (empty), Aluminum (pie plates, foil, etc.), Bottles &amp; Cans (steel, tin &amp; aluminum), Containers, Pots &amp; Pans, Utensils</i></p> <p><i>Paper &amp; Cardboard: Books &amp; Bristol Board, Boxboard Boxes, Cardboard, Cards &amp; Catalogues, Cereal Boxes Coffee Cups, Drink Trays, Egg Cartons, Envelopes, Fast Food Paper Bags, Fast Food Boxes, Pizza Boxes, File Folders, Flyers, Newspaper and Magazines,</i></p>	Plastic #6 Glass

#	<b>Regional Services Commissions</b>	<b>Packaging and Paper Accepted</b>	<b>Items Not Accepted</b>
		<p><i>Phone Books, Plates and Cups, Posters, Sticky Notes, Wrapping Paper</i></p> <p><i>Plastics: Bottles (caps off), Containers (covers off), Cups &amp; Dishes, Hard Plastic Packaging, Jugs, Medicine Bottles (empty) Milk &amp; Juice Jugs, Hard Plastics numbered: 1, 2, 3, 4, 5 &amp; 7, Plastic Bags (Clean &amp; Dry) – Grocery and other plastic shopping bags, bread bags, clean re-sealable food storage bags, etc.</i></p> <p><i>To prevent mechanical sorting equipment from getting entangled, put all plastic bags in a single bag and tie it.</i></p> <p><i>Other Items: Frozen Juice Cans Lids, Covers Milk &amp; Juice Cartons Styrofoam (meat trays, cups, plates, etc.)</i></p>	
8	Regional Service Commission 8	<p><i>Metals: Aerosol Cans (empty), Aluminum (pie plates, foil, etc.), Bottles &amp; Cans (steel, tin, &amp; aluminum), Containers, Pots &amp; Pans, Utensils</i></p> <p><i>Paper &amp; Cardboard: Books &amp; Bristol Board, Boxboard Boxes, Cardboard Cards &amp; Catalogues, Cereal Boxes, Coffee Cups, Drink Trays, Egg Cartons, Envelopes, Fast Food Paper Bags, Fast Food Boxes, Pizza Boxes, File Folders, Flyers, Newspaper and Magazines,</i></p>	<p><i>Plastic #6</i></p> <p><i>Glass</i></p> <p><i>Binders</i></p> <p><i>Cheese wrappers</i></p> <p><i>Feed Bags</i></p> <p><i>Paper towels, napkins, tissues</i></p> <p><i>Plastic wrap</i></p> <p><i>Potato chip bags</i></p> <p><i>Single-serve Yogurt containers</i></p> <p><i>Straws</i></p> <p><i>Vacuum bags</i></p>

#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
		<p><i>Phone Books, Plates and Cups, Posters, Sticky Notes, Wrapping Paper</i></p> <p><i>Plastics: Bottles (caps off), Containers (covers off), Cups &amp; Dishes, Hard Plastic Packaging, Jugs, Medicine Bottles (empty) Milk &amp; Juice Jugs, Hard Plastics numbered: 1, 2, 3, 4, 5 &amp; 7 Plastic Bags (Clean &amp; Dry) - Grocery and other plastic shopping bags, bread bags, clean resealable food storage bags, etc.</i></p> <p><i>To prevent mechanical sorting equipment from getting entangled, put all plastic bags in a single bag and tie it.</i></p> <p><i>Other Items: Frozen Juice Cans Lids, Covers Milk &amp; Juice Cartons Styrofoam (meat trays, cups, plates, etc.)</i></p>	
9	Fundy Regional Service Commission	<p><i>Corrugated Cardboard: All cardboard boxes with the wavy piece in the middle</i></p> <p><i>Paper &amp; Boxboard:</i></p> <ul style="list-style-type: none"> <li><i>• Milk, juice jugs • Yogurt, sour cream, cream cheese &amp; ice cream tubs • Ketchup, &amp; salad dressing bottles • Shampoo bottles • Bleach &amp; detergent bottles • Beverage containers (no glass)</i></li> </ul> <p><i>Plastic 1,2,5:</i></p>	<p><i>Plastic bags, including grocery bags, bread bags &amp; plastic wrap</i></p> <p><i>Black garbage bags</i></p> <p><i>Wet or dirty cardboard</i></p> <p><i>Coffee cups or lids</i></p> <p><i>Waxed cardboard or paper</i></p> <p><i>Vinyl siding</i></p> <p><i>Styrofoam</i></p> <p><i>Chip bags</i></p> <p><i>Plastic furniture or toys</i></p>

#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
		<ul style="list-style-type: none"> <li>• Milk, juice jugs • Yogurt, sour cream, cream cheese &amp; ice cream tubs • Ketchup, &amp; salad dressing bottles • Shampoo bottles • Bleach &amp; detergent bottles • Beverage containers (no glass)</li> <li>Milk Containers: Milk, cream &amp; buttermilk cartons</li> <li>Metal: All food &amp; pet food cans Aluminum pie plates &amp; foil • Pop cans</li> </ul>	
10	Southwest New Brunswick Service Commission	<ul style="list-style-type: none"> <li>Paper/Cardboard</li> <li>#1 Plastic (PETE) containers</li> <li>#2 Plastic (HDPE) containers</li> <li>#4 Plastic (LDPE) containers</li> <li>#5 Plastic (PP) containers</li> <li>#7 Plastic (OTHER) containers</li> <li>Metal food cans - rinsed and dried</li> <li>Milk cartons - rinsed and dried</li> </ul>	<ul style="list-style-type: none"> <li>Glass</li> <li>Expanded Foam (Styrofoam)</li> <li>Plastic Bags or any plastic films</li> </ul>
11	Regional Service Commission II	<ul style="list-style-type: none"> <li>Metal Food Cans</li> <li>Plastics (1-7), # 4 plastic shopping bags</li> <li>Milk Cartons</li> <li>Newsprint</li> <li>Cardboard &amp; Boxboard</li> <li>Paper</li> </ul>	<ul style="list-style-type: none"> <li>• glass • foil plates • plastic toys or plastic swimming pools • plastic wrapping, such as stretch wrap • plastic bags from gardening products such as fertilizer • motor oil containers • ceramic dishes • Styrofoam • unnumbered plastics</li> <li>• plastic box liners • pet food bags • waxed paper • candy wrapping • hardcover books • wrapping paper</li> </ul>
12	Western Valley Regional Service Commission	<ul style="list-style-type: none"> <li>Plastics Symbol 1 - 7</li> <li>Food &amp; Beverage Cartons,</li> <li>Aluminum cooking pans, plates</li> </ul>	<ul style="list-style-type: none"> <li>Plastic bags or wrap,</li> <li>Ammunition , Batteries, Binders,</li> <li>Coat hangers (plastic or wire),</li> </ul>



#	Regional Services Commissions	Packaging and Paper Accepted	Items Not Accepted
		<p><i>&amp; tin foil, Beverage cans (if not returning for refund), Canning lids &amp; rings, Metal lids , Cans (juice, pet food, vegetable, fruits, soup, meats)</i></p> <p><i>Metal: Aluminum cooking pans, plates &amp; tin foil, Beverage cans (if not returning for refund), Canning lids &amp; rings, Metal lids, Cans (juice, pet food, vegetable, fruits, soup, meats)</i></p> <p><i>Paper: Books (hard covers must be removed), Envelopes (plain or window), Flyers (NO bags), Greeting cards (plain) , Loose paper, Magazines , Newspapers, Phone books , Shredded paper (put in a clear bag, tie and place in bin)</i></p> <p><i>Cardboard: Cereal boxes, Cracker boxes, Corrugated boxes, Drink trays, Egg cartons, Other food boxes, Paper towel &amp; toilet paper rolls, Shoe boxes, Tissue boxes</i></p>	<p><i>Disposable cups , Film plastics (e.g. wrap around paper towel), Fireworks, Foam egg cartons, trays or take out containers (even if numbered), Frying pans or baking sheets, Garbage , Glass of any kind, Lottery tickets, Paper towel &amp; tissues, Pellet bags and feed bags , Photographs , Plastic shopping/bread bags , Plastics without a number, Plastics wrap or sandwich bags, Playing cards, Potato bags, chip, flour or sugar bags, Soiled or wet items of any kind, Store receipts, Straws, Styrofoam, Tissue paper, Vinyl Siding/Construction Materials, Wrapping paper</i></p>

The following table sets out the available data for the tonnes of recyclable materials collected by each RSC in 2020.

**Table 3.4 Quantity of Packaging and Paper Collected in 2020**

#	Regional Services Commissions	Tonnes
1	<i>Northwest Regional Service Commission</i>	<i>1,700</i>
2	<i>Restigouche Regional Service Commission</i>	<i>435</i>
3	<i>Chaleur Regional Service Commission</i>	<i>3,354</i>
4	<i>Peninsule Acadienne Regional Service Commission</i>	<i>2,200</i>

#	Regional Services Commissions	Tonnes
5	Greater Miramichi Regional Service Commission	1,514
6	Kent Regional Service Commission	4,900
7	Southeast Regional Service Commission	16,758
8	Regional Service Commission 8	3,494
9	Fundy Regional Service Commission	5,932
10	Southwest New Brunswick Service Commission	755
11	Regional Service Commission 11	4,520
12	Western Valley Regional Service Commission	759
Totals		46,321

### 3.2 Non-Residential Collection Systems

Routing for residential recycling collection services often includes non-residential locations, such as streetfront retail, institutions (e.g. churches), municipal offices and other venues (e.g. libraries).

Similarly, drop-off depots often receive materials from small to medium businesses. Some of the information received from the RSCs and local municipalities suggests that the quantity of recyclables reported includes packaging and paper from these types of non-residential sources. Prior to a producer responsibility program, municipalities do not commonly track this information as they have no need to identify packaging and paper from residential consumers separately from packaging and paper from other consumers.

To comply with the Regulation and to track performance of the Stewardship Plan, it will be necessary to explore options with RSCs and local municipalities to segregate (physically or through audit-based mathematical apportionment) packaging and paper from residential consumers from other sources of packaging and paper as part of implementation of the Stewardship Plan.

### 3.3 Processing Systems

Recycling collection vehicles typically deliver materials to facilities where they are processed or to receiving facilities that then transfer the materials to another location for processing.

The table below identifies the facility at which packaging and paper from each RSC is being processed.

**Table 3.5 Facilities Handling Collected Packaging and Paper**

<b>#</b>	<b>Regional Services Commission</b>	<b>Facilities Processing Collected Paper and Packaging</b>
1	Northwest Regional Service Commission	Transferred from Riviere Verte, NB to L'Atelier des Copains, St. Francois, NB or to Societe Via, Riviere de Loup, PQ
2	Restigouche Regional Service Commission	Acadian Peninsula Recycling Centre (Tracadie)
3	Chaleur Regional Service Commission	Acadian Peninsula Recycling Centre (Tracadie)
4	Peninsule Acadienne Regional Service Commission	Acadian Peninsula Recycling Centre (Tracadie)
5	Greater Miramichi Regional Service Commission	Eco360 (Moncton)
6	Kent Regional Service Commission	Eco360 (Moncton)
7	Southeast Regional Service Commission	Eco360 (Moncton - managed by RSC 7)
8	Regional Service Commission 8	Materials Recovery Facility (located at RSC8 Regional Waste Management Facility, Sussex); most transferred to Eco360 (Moncton)
9	Fundy Regional Service Commission	Fundy Region Solid Waste Facility, Grand Bay-Westfield
10	Southwest New Brunswick Service Commission	Southern Valley Transfer Station, Woodstock; marketed by Scotia Recycling
11	Regional Service Commission 11	Materials Recycling Facility (located at RSC 11 Fredericton Regional Landfill)
12	Western Valley Regional Service Commission	Southern Valley Transfer Station, Woodstock; marketed by Scotia Recycling

### **3.4 Social and Capital Infrastructure**

Recycling is broadly achieved through the collaborative efforts of governments, the private sector waste management industry and the public.

Government and community investments to develop and operate a province-wide system of transfer stations and engineered landfills have been complimented by a steady move forward in applying the direction mandated through the Designated Materials Regulation-Clean Environment Act.

*There are six engineered landfills complimented by seven transfer stations owned and operated by governments in the province. Additionally some municipalities and Regional Service Commissions have made capital investments in collection equipment (trucks/drop-off bins).*

*Private companies have also invested in recycling capacity in the province including transfer and processing facilities.*

*The municipal and private sector investments in collection, transfer and processing systems for residential packaging and paper will be leveraged where feasible during transition to producer responsibility.*

### **3.5 Local Governance Reform**

*The Province of New Brunswick has initiated a comprehensive change to the local governance structures that will substantially reduce the number of local government entities from approximately 400 to approximately 80 and provide local elected official capacity to all areas of the province. This transition is occurring over 2022 and is expected to be substantially complete in 2023.*

*While the information presented in this Stewardship Plan with respect to recycling services represents what is currently being provided to incorporated and unincorporated areas, Circular Materials Atlantic recognizes that the entities with which it will engage to deliver an approved Stewardship Plan may be different than those currently providing services.*

### **4.0 Engagement and Data Collection**

*Circular Materials Atlantic retained the services of Kim Hughes, an independent sustainability consultant with knowledge of recycling programs in New Brunswick to undertake a review of existing recycling services across the province. Information collected is being used to inform and guide Circular Materials Atlantic in the development of a Stewardship Plan to manage packaging and paper as defined in part 5.3, Designated Materials Regulation – Packaging and Paper- Clean Environment Act.*

*The collection of information and interaction with those involved in the provision of recycling services, the Department of Environment and Local Government, Recycle NB, Regional Service Commissions, municipalities and First Nation communities took place from January through to March 2022.*

#### **4.1 Minister of Local Government and Local Governance Reform**

*The Department of Local Government and Local Governance Reform was contacted in January 2022 to obtain the latest information with respect to governance reform including changes to Regional Services Commission and municipal boundaries and the anticipated implementation timing. Information was also requested and received outlining solid waste management services in the local service districts.*

#### **4.2 Department of Environment and Local Government**

*The Department of Environment and Local Government was contacted in January 2022 to obtain current information with respect to provision of recycling services in unincorporated areas as well as to obtain a list of municipalities, including the staff contacts that could provide information with respect to solid waste and recycling services in their communities.*

#### **4.3 Regional Services Commissions and Local Governments**

*Following preliminary discussions with Regional Service Commission 11 (RSC11), a meeting was hosted by RSC11 staff to meet with Circular Materials Atlantic staff to discuss the proposed approach to solicit information from RSCs and municipalities across the province. This meeting had participation from four Regional Service Commissions representing the majority of the households receiving recycling services in New Brunswick.*

*Following this meeting, an introductory e-mail (bilingual) was sent to all Regional Service Commission Executive Directors introducing Circular Materials Atlantic and indicating that information regarding recycling services in the region would be requested to provide background on the current state of recycling services.*

*Each RSC was then contacted to request information regarding recycling services including:*

- *The number and types of households that receive household (curbside or multi-family) collection service for packaging and paper;*
- *The number and locations of drop-off depots for residential paper and packaging;*
- *Types of packaging and paper accepted and not accepted in collection systems;*
- *Curbside collection frequency;*
- *Number of streams (single-stream or dual-stream) in collection systems;*
- *Quantity of material collected;*

- *Annual recycling collection and processing costs;*
- *Expiry dates of existing collection and processing contracts;*
- *How and where collected material is processed; and*
- *What portion of collected material is directed to commodity markets.*

*Regional Service Commissions compiled and provided information that was available to them in response to the request. Information submitted reflected services provided by the RSCs but did not consistently reflect services provided by the lower tier municipalities within the RSC.*

*To better understand the municipal role in the provision of recycling services, each municipality was contacted by phone to discuss existing provision of recycling services and contracts by the municipalities. Where municipalities responded to this outreach, discussions typically included background on the Regulation and Circular Materials Atlantic's activities to develop a Stewardship Plan for packaging and paper.*

#### **4.4 First Nations**

*Representatives from fifteen First Nation communities were contacted<sup>5</sup> to introduce Circular Materials Atlantic and seek information on existing recycling services in their communities.*

*Seven First Nation communities responded with information about current recycling services in their community.*

*Regional Service Commissions in which the remaining eight First Nation communities are situated have provided information on recycling services currently available. In certain instances, recycling services are provided by the Regional Service Commission to the First Nation community.*

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<sup>5</sup> *Have not contacted Peskotomuhkati at Skahtik (Passamaquoddy) to date as the group is in the process of being recognized.*

## 5.0 Stewardship Plan Scope

### 5.1 Designated Materials

#### 5.1.1 Paper

*Paper is defined in section 2 of the Designated Materials Regulation – Clean Environment Act as “paper that is provided to a consumer that is printed, or intended to be printed, and includes telephone directories, but does not include*

- (a) reference books;*
- (b) literary books;*
- (c) text books; or*
- (d) paper that is unsafe or unsanitary, or could become unsafe or unsanitary by virtue of its anticipated use, and is not suitable to be recycled.”*

*This Stewardship Plan includes printed and unprinted paper, such as a newspaper, magazine, promotional material, directory, catalogue or paper used for copying, writing or any other general use. Paper does not include hard or soft cover books or hard cover periodicals.*

*Consistent with the definitions above, the following categories of paper are included in this Stewardship Plan.*

**Table 5.1 Categories of Paper**

<i>Newspapers</i>	<b>Definition:</b> <i>Newspaper publications with or without a glossy cover and published for quick consumption.</i>
<i>Newsprint (inserts and circulars)</i>	<b>Definition:</b> <i>Newsprint inserts, flyers and circulars.</i> <b>Examples:</b> <i>Includes park guides, auto publications, real estate supplements and product manuals printed on newsprint.</i>
<i>Magazines and Catalogues</i>	<b>Magazines:</b> <b>Definition:</b> <i>Bound periodicals, whether the paper is coated, glossy/ non-glossy, which sometimes includes mastheads.</i> <b>Examples:</b> <i>Includes daily/weekly/monthly or annual magazines and travel or promotional magazines.</i>  <b>Catalogues:</b> <b>Definition:</b> <i>Bound paper, whether the paper is coated, glossy/non-glossy.</i> <b>Examples:</b> <i>Retailer product catalogues, bound promotional documents</i>

	<p>containing product lists, coupon books, automotive and real estate guides/catalogues (if not printed on newsprint).</p>
Directories	<p><b>Definition:</b> Printed bound directories, whether printed on newsprint, glossy/non-glossy paper of residential and/or business contact information such as telephone numbers, postal codes and websites.</p> <p><b>Examples:</b> Phone books and business directories.</p>
Paper for General Use	<p><b>Definition:</b> Paper that is used for copying, writing or any other general use.</p> <p><b>Examples:</b> Paper based home, craft, hobby and home office supplies including items such as loose-leaf paper purchased for use in home printers, blank graph or ruled notebooks and notepads, sketchpads, construction and hobby craft paper.</p> <p>Excludes bound reference books, bound literary books, bound textbooks and paper which may be unsafe or unsanitary to recycle such as paper towel or toilet paper.</p>
Purchased Posters, Calendars, Greeting Cards and Envelopes	<p><b>Definition:</b> Paper product supplied to consumers.</p> <p><b>Examples:</b> Posters, calendars, greeting cards, blank envelopes purchased individually or in bulk.</p>
Other Printed Materials	<p><b>Definition:</b> All other paper products/materials that are not included in the paper product categories above.</p> <p><b>Examples:</b> Blank and printed envelopes distributed to the residential consumer; promotional cards sent to the residential consumer; free promotional calendars and posters; promotional inserts within or outside envelopes; printed information found within packaged products (such as assembly instructions, user guides, promotional information, warranty cards, product safety information, coupons); annual policy information including policy documents and statements; monthly, quarterly or annual statements; investment fund reports, fund prospectus, contracts, lottery tickets, scratch cards and fund raising tickets; cash register receipts, debit and credit receipts, proof of purchases and other printed material provided at point of sale such as promotional post cards; statements and information inserts from banks, credit card companies and utility companies; information and forms distributed by municipal, regional, provincial and federal governments; transportation and transit schedules, HR-related documents distributed to employees such as T4s.</p>



### **5.1.2 Packaging and Packaging-Like Products**

*Packaging is defined in section 2 of the Designated Materials Regulation – Clean Environment Act as: “any material that is used for the containment, protection, handling, delivery or presentation of a product that is provided to a consumer, any marketing material and any packaging-like products, but does not include*

- (a) a designated material referred to in section 35 or 50.11;*
- (b) a beverage container as defined in the Beverage Containers Act; or*
- (c) packaging that is unsafe or unsanitary, or could become unsafe or unsanitary by virtue of its anticipated use, and is not suitable to be recycled.”*

*Packaging includes primary packaging<sup>6</sup>, convenience packaging<sup>7</sup> and transport packaging<sup>8</sup> that is provided with a product.*

*Packaging-like product is defined in section 2 of the Designated Materials Regulation – Clean Environment Act as “a container or covering that is sold as a product, is used by a consumer for their own packaging needs and would be ordinarily disposed of after a single use or short-term use, but does not include*

- (a) a product designed for the containment of waste; or*
- (b) a product that is unsafe or unsanitary, or could become unsafe or unsanitary by virtue of its anticipated use, and is not suitable to be recycled.”*

*Packaging-like product includes aluminum foil, a metal tray, plastic film, plastic wrap, wrapping paper, a paper bag, beverage cup, plastic bag, plastic container, cardboard box or envelope that is not used as packaging when supplied to a consumer but is normally used for containment. Packaging-like product includes single-use products, as well as those realistically intended to be used for a short term, typically for a period of five years or less, regardless of whether they can be re-used or not. For example, some reusable plastic food storage containers are*

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<sup>6</sup> Primary packaging is material that is used for the containment, protection, handling, delivery and presentation of a product that is provided with the product to an end user at the point of sale and includes packaging designed to group one or more products for the purposes of sale, but does not include convenience packaging or transport packaging.

<sup>7</sup> Convenience packaging is material used in addition to primary packaging to facilitate end users' handling or transportation of one or more products and includes items such as bags and boxes that are supplied to end users at check out, whether or not there is a separate fee for these items.

<sup>8</sup> Transport packaging is material used in addition to primary packaging to facilitate the handling or transportation of one or more products by persons other than end users, such as a pallet, bale wrap or box, but does not include a shipping container designed for transporting things by road, ship, rail or air.

made with plastic materials that are less durable and tend to break easily. The five-year time frame is intended to separate these items from more durable types of plastic materials, such as large plastic storage totes, which are designed for durability and tend to have much longer life spans<sup>9</sup>.

Consistent with the definitions above, the following categories of packaging and packaging-like products are included in this Stewardship Plan.

**Table 5.2 Categories of Packaging**

<p><i>Gable Top Containers</i></p>	<p><i>Definition: Includes Gable Top polycoated cartons used for non-beverage products, and any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Molasses, sugar cartons, confectionery products, laundry and cleaning products.</i></p>
<p><i>Aseptic Containers</i></p>	<p><i>Definition: Includes aseptic polycoated and foilized boxes and containers used for non-beverage products, and any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Aseptic containers for soup, sauces and other non-beverages.</i></p>
<p><i>Single-sided Polycoated Paperboard</i></p>	<p><i>Definition: Includes packaging made from paperboard that has a polyethylene (or other plastic) coating on the inner side of the packaging only.</i></p> <p><i>Examples of single-sided polycoated paperboard packaging include paper cups and bowls provided at quick service restaurants to serve foods and beverages. Paper takeout boxes with a polycoat lining on the inside of the packaging would be reported to this category.</i></p>
<p><i>Double-sided Polycoated Paperboard</i></p>	<p><i>Definition: Includes packaging made from paperboard that has a polyethylene (or other plastic) coating on both the outer and inner side of the packaging.</i></p> <p><i>Examples of doubled-sided polycoated paperboard packaging include tubs and folding boxes used to package ice cream, cold drink paper cups provided at quick service restaurants to serve beverages. Paper</i></p>

<sup>9</sup> Recycle NB – Amendments to the Designated Materials Regulation to include Packaging and Paper Products – Guidance Document – Available: <https://recyclenb.com/packaging-and-paper-products-guidance-document>

	<p>takeout boxes with a polycoat lining on both the inside and the outside of the packaging would be reported to this category.</p>
<p>Paper Laminates</p>	<p>Definition: Includes laminated paper packaging where paper is the main component, along with either metalized foil/wax/plastic. The paper component represents the greatest percentage by weight.</p> <p>Examples: Fibre spiral wound containers (with plastic, aluminum, steel bottom and lid) for: frozen juice, chips, cookie dough, coffee, nuts, microwavable paper containers, wrappers, paper wrap packaging provided with food, such as sandwiches, burgers, or muffins, paper/plastic based wrapping paper and gift bags supplied as packaging at point of sale, pet food bags, laminated Kraft paper bags (filled at point of sale) and laminated Kraft paper packaging. Include any paper laminate packaging-like products supplied to consumers in this category.</p>
<p>Kraft Paper Carry-Out Bags</p>	<p>Definition: Non-laminated Kraft paper bags filled at point of sale or supplied to consumers as packaging-like products.</p> <p>Examples: Non-laminated grocery bags, prescription bags, non-laminated paper take-out bags used for mushrooms or food delivery.</p>
<p>Kraft Paper - Non-Laminated</p>	<p>Definition: Non-laminated Kraft paper packaging.</p> <p>Examples: Kraft paper packaging used for products such as flour, sugar, potatoes or oatmeal. Includes non-laminated Kraft paper used for mailing packages.</p>
<p>Corrugated Cardboard</p>	<p>Definition: Multi-layered paper board and fibre which may have one or more layers of corrugation.</p> <p>Examples: Electronic product boxes such as television and computer boxes, pizza boxes, boxes used for transport of e-commerce items to residential consumers. Includes corrugated moving boxes and banker boxes supplied to consumers as packaging-like products.</p>
<p>Boxboard and Other Paper Packaging</p>	<p>Definition: Single layered paperboard and fibre board with no corrugation and all types of moulded pulp packaging. Includes paper packaging not included in any other paper subcategories. Fibre-board containers made from other non-wood sources (e.g. bamboo, bagasse, eucalyptus).</p> <p>Examples: Paper board such as cereal, tissue and shoe boxes, moulded pulp paper packaging such as egg cartons, fibre pots and formed coffee take-out trays, stiff paperboard used to mount plastic blister packs (e.g., for toys and batteries), the roll inside of toilet paper, paper towel, tin foil and plastic wrap, tissue paper used as paper packaging for stuffing packaging, paper-based wrapping paper and gift bags</p>

	<p>supplied as packaging at point of sale or as packaging-like products, newsprint used as packaging material in shoe boxes and shipping boxes used for transport of e-commerce items to residential customers, clothing hang tags.</p>
<p>Clear PET Bottles, Jars and Jugs &lt; 5 Litres</p>	<p>Definition: Transparent, light blue or light green #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of less than 5 litres of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code.</p> <p>Examples: Salad dressing bottles, peanut butter containers, edible oil bottles, dish soap or mouthwash bottles.</p>
<p>Clear PET Bottles, Jars and Jugs &gt;= 5 Litres</p>	<p>Definition: Transparent, light blue or light green #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of 5 litres or more of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code.</p> <p>Examples: Salad dressing bottles, edible oil bottles.</p>
<p>Coloured PET Bottles, Jars and Jugs &lt; 5 Litres</p>	<p>Definition: Coloured #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of less than 5 litres of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code.</p> <p>Examples: Salad dressing bottles, peanut butter containers, edible oil bottles, dish soap or mouthwash bottles.</p>
<p>Coloured PET Bottles, Jars and Jugs &gt;= 5 Litres</p>	<p>Definition: Coloured #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of 5 litres or more of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code.</p> <p>Examples: Salad dressing bottles, edible oil bottles.</p>
<p>Clear PET Thermoform Containers</p>	<p>Definition: PET thermoform clear, light green and light blue containers such as clamshells used for non-beverage products.</p> <p>Examples: Muffin or cake containers, salad containers, egg containers, trays.</p>
<p>Coloured PET Thermoform Containers</p>	<p>Definition: Coloured PET thermoform containers such as clamshells used for non-beverage products.</p> <p>Examples: Muffin or cake containers, salad containers, egg containers, trays.</p>

<p><i>Natural HDPE Bottles, Jars and Jugs &lt; 5 Litres</i></p>	<p><i>Definition: Natural or translucent #2 HDPE (High Density Polyethylene) bottles, jars and jugs, with a volume less than 5 litres displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Laundry detergent, shampoo, bleach, vinegar, corn syrup, body wash, household cleaning products, etc.</i></p>
<p><i>Natural HDPE Bottles, Jars and Jugs &gt;= 5 Litres</i></p>	<p><i>Definition: Natural or translucent #2 HDPE (High Density Polyethylene) bottles, jars and jugs with a volume of 5 litres or more, displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Laundry detergent, bleach, cleaning supplies supplied in containers that are 5 litres or more.</i></p>
<p><i>Coloured HDPE Bottles, Jars and Jugs &lt; 5 Litres</i></p>	<p><i>Definition: Coloured #2 HDPE (High Density Polyethylene) bottles, jars and jugs, with a volume less than 5 litres displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Laundry detergent, shampoo, bleach, vinegar, corn syrup, body wash, household cleaning products, etc.</i></p>
<p><i>Coloured HDPE Bottles, Jars and Jugs &gt;= 5 Litres</i></p>	<p><i>Definition: Coloured #2 HDPE (High Density Polyethylene) bottles, jars and jugs with a volume of 5 litres or more, displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Laundry detergent, bleach, cleaning supplies.</i></p>
<p><i>Other Polyethylene (PE) Packaging &lt; 5 Litres</i></p>	<p><i>Definition: Includes all other polyethylene rigid (non-foamed) packaging not reported above with a volume less than 5 litres displaying the #2 or #4 resin code containing a non-beverage product. Does not include laminated PE packaging tubes with non-PE barrier layers.</i></p> <p><i>Examples: #2 HDPE Pails and buckets (that are not bottles, jars or jugs) and lids used to package oils or other prepared foods and consumer goods. Includes #4 LDPE bottles.</i></p>
<p><i>Other Polyethylene (PE)</i></p>	<p><i>Definition: Includes all other polyethylene rigid (non-foamed) packaging not reported above with a volume of 5 litres or more displaying the #2</i></p>

<p><i>Packaging &gt;= 5 Litres</i></p>	<p><i>or #4 resin code containing a non-beverage product. Does not include laminated PE packaging tubes with non-PE barrier layers.</i></p> <p><i>Examples: #2 HDPE Pails and buckets (that are not bottles, jars or jugs) used to package oils or other prepared foods and consumer goods. Includes #4 LDPE bottles.</i></p>
<p><i>Polypropylene (PP) Packaging &lt; 5 Litres</i></p>	<p><i>Definition: Includes all PP #5 rigid packaging and containers with a volume of &lt; 5 litres displaying the #5 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Cosmetic products, such as creams and lotions, prescription pills, as well as microwaveable foods are commonly packaged in PP containers.</i></p>
<p><i>Polypropylene (PP) Packaging &gt;= 5 Litres</i></p>	<p><i>Definition: Includes all PP #5 rigid packaging with a volume of 5 litres or more displaying the #5 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Cosmetic products, such as creams and lotions, prescription pills, as well as microwaveable foods are commonly packaged in PP containers.</i></p>
<p><i>Expanded/Extruded Polystyrene</i></p>	<p><i>Definition: All forms of expanded/extruded foam packaging used in food and protective packaging applications and may display resin code #6.</i></p> <p><i>Examples: Meat trays, beverage cups used as packaging, cushion packaging for consumer products and PS foam packing peanuts. Includes beverage cups, plates and other packaging-like-products made of expanded polystyrene supplied to consumers.</i></p>
<p><i>Rigid Polystyrene (PS)</i></p>	<p><i>Definition: All other non-expanded polystyrene packaging that is not included in the Expanded/Extruded Polystyrene category above. May display resin code #6.</i></p> <p><i>Examples: Polystyrene clear clamshell containers such as berry and muffin containers, opaque clamshell containers such as food take-out containers, yogurt containers, clear rigid trays, and packaging-like products such as beverage cups and plates, plastic hangers provided as packaging with an item of clothing.</i></p>
<p><i>PLA, PHA, PHB</i></p>	<p><i>Definition: Plastic containers consisting of bio-plastics made of either PLA (polylactic acid), PHA (polyhydroxyalkanoates) and PHB (poly-3-hydroxybutyrate) polymers for non-beverage products, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p>

	<p><i>Examples: PLA clamshell containers, PLA egg containers, peanut packaging.</i></p>
<p><i>All Other Rigid Plastic Packaging (not listed above) &lt; 5 Litres</i></p>	<p><i>Definition: All forms of rigid or foamed plastic packaging and containers with a volume less than 5 litres, for non-beverage products, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program that are not included in any of the other plastic subcategories, including all #3 PVC packaging and Polyurethane (PU) foam packaging. Also includes non-coded plastics.</i></p> <p><i>Examples: Hand cream tubes, polyethylene foam sheets, inserts and moulds for packing appliances, some plastic blister packaging used to display toys, batteries or other products, and plastic hangers provided as packaging with an item of clothing.</i></p>
<p><i>All Other Rigid Plastic Packaging (not listed above) &gt;= 5 Litres</i></p>	<p><i>Definition: All forms of rigid or foamed plastic packaging and containers with a volume of 5 litres or more, for non-beverage products, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program that are not included in any of the other plastic subcategories, including all #3 PVC packaging and Polyurethane (PU) foam packaging. Also includes non-coded plastics.</i></p> <p><i>Examples: Hand cream tubes, polyethylene foam sheets, inserts and moulds for packing appliances, some plastic blister packaging used to display toys, batteries or other products, and plastic hangers provided as packaging with an item of clothing.</i></p>
<p><i>LDPE/HDPE Film</i></p>	<p><b>Definition:</b> Includes plastic film made from LDPE, LLDPE, HDPE (Low Density, Linear Low Density, High Density Polyethylene) or combinations thereof. May display resin code #4 or #2. PE films reported under this category must not contain any barrier layers or other non-PE resins.</p> <p><b>Examples:</b> May include certain fresh and frozen vegetable bags, diaper packaging, bread bags, shrink wrap around products (e.g., around a tray of 24 water bottles), dry cleaner bags, soil and fertilizer bags, produce and bulk store bags provided to the residential consumer as service packaging, film used around newspapers, magazines and catalogues for protection. Includes LDPE/HDPE Film supplied to consumers as packaging-like products</p>
<p><i>LDPE/HDPE Film Carry-Out Bags</i></p>	<p><i>Definition: Includes #4 LDPE or #2 HDPE (Low Density/High Density Polyethylene) film carry-out bags provided at point of sale or supplied as packaging-like products. May display resin code #4 or #2.</i></p> <p><i>Examples: Plastic shopping bags with or without images or text.</i></p>

<p><i>Polypropylene (PP) Film</i></p>	<p><i>Definition: Includes plastic film made from PP. May display resin code #5. PP films reported under this category must not contain any barrier layers or other non-PP resins.</i></p> <p><i>Examples: May include certain fresh and frozen vegetable bags or overwrap, baked goods, and confectionary products.</i></p>
<p><i>PLA, PHA, PHB - Plastic Film</i></p>	<p><i>Definition: Plastic film consisting of bio-plastics made of either PLA (polylactic acid), PHA (polyhydroxyalkanoates) and/or PHB (poly-3 hydroxybutyrate) polymers.</i></p> <p><i>Examples: PLA, PHA, PHB shrink wrap around products, PLA, PHA, PHB bags for vegetables and salad, PLA, PHA, PHB film used around newspapers and magazines and catalogues for protection.</i></p>
<p><i>PLA, PHA, PHB Carry-Out bags</i></p>	<p><i>Definition: Plastic carry-out bags consisting of bio-plastics made of either PLA (polylactic acid), PHA (polyhydroxyalkanoates) and/or PHB (poly-3-hydroxybutyrate) polymers.</i></p>
<p><i>Plastic Laminates and Other Flexible Plastic Packaging</i></p>	<p><i>Definition: All laminated film and laminated flexible plastic packaging comprised of multiple plastic resin types and/ or combinations of plastic resins and metalized foils, wax, and/or paper. This material category also includes mono material such as those made of PET, PVC, EVA and other films that do not meet the definition of LDPE/HDPE Film or PLA, PHA, PHB – Plastic film.</i></p> <p><i>Examples: May include candy wrappers, coffee pouches, chip bags, cheese wraps, cereal liner bags, shrink wrap, prepackaged deli meat pouches, yogurt stick packs, vacuum packaging, bubble wrap, stand up pouches, woven or non-woven plastic bags intended for more than one use when provided as packaging, net bags used for citrus fruits, nuts or cosmetic samples, plastic or plastic/foil based wrapping paper and gift bags supplied as packaging or packaging-like products at point of sale.</i></p>
<p><i>Steel Aerosol Containers</i></p>	<p><i>Definition: All aerosol containers that are more than 50% steel by weight.</i></p> <p><i>Examples: Air freshener, deodorant and hairspray containers, food spray cans, wax and polish spray cans, lubricating oil spray cans, insulating foam spray cans.</i></p>
<p><i>Other Steel Containers and Packaging</i></p>	<p><i>Definition: All other containers or packaging that are more than 50% steel by weight or other metal and are not included in another steel and other metal packaging subcategory. Includes any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.</i></p> <p><i>Examples: Steel food containers such as soup, lids and closures on packaging (closures for both beverage and non-beverage products),</i></p>



	<i>wire hangers when provided as packaging with an item of clothing, cookie tins, tea tins.</i>
<i>Aluminum Aerosol Containers</i>	<i>Definition: Includes aluminum aerosol containers that are at least 95% aluminum by weight. Examples: Air freshener spray cans, hairspray cans, food spray cans, deodorant spray cans, mousse spray cans, etc.</i>
<i>Aluminum Food Containers</i>	<i>Definition: Sealed, rigid containers that are at least 95% by weight of aluminum. Includes any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. Examples: Pet food cans, food cans, sardine cans, aluminum shoe polish containers and other similar non-food aluminum containers.</i>
<i>Other Aluminum Packaging</i>	<i>Definition: Aluminum packaging and packaging-like products not included in another aluminum packaging subcategory. Examples: Foil wrap supplied to the residential consumer as packaging, pie plates, yogurt/sour cream seals, frozen food trays, lids and closures for beverage and non-beverage containers, tea light candle holders.</i>
<i>Clear Glass</i>	<i>Definition: Clear glass containers used for non-beverage products or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. Examples: Clear food containers such as pickles, salsa, tomato sauce and jam jars, ketchup bottles, cosmetic containers for creams and spice bottles.</i>
<i>Coloured Glass</i>	<i>Definition: Coloured glass containers used for non-beverage products or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. Examples: Olive oil bottles, balsamic vinegar bottles, cosmetic containers for creams that are coloured glass.</i>

## **5.2 Designated Producers**

*Section 2(b.2) of Part 5.3 Packaging and Paper of the Designated Materials Regulation - Clean Environment Act states that the “brand owner” with respect to packaging, packaging-like products and paper sold, offered for sale or distributed in or into the Province, is a person who:*

- (i) is a manufacturer of packaging or paper;*
- (ii) is a distributor of packaging or paper;*
- (iii) is an owner or licensee of a registered or unregistered trademark under which packaging or paper is sold, offered for sale or distributed; or*

*(iv) if packaging or paper is imported into the Province, is the first person to sell the packaging or paper.*

*Consistent with section 2(b.2), this Stewardship Plan defines the obligated producer of a paper product or packaging-like product using the following hierarchy:*

- A. the brand holder<sup>10</sup> of the paper product or packaging-like product, if the brand holder is resident in Canada<sup>11</sup>;*
- B. if there is no person described in clause A, the importer<sup>12</sup> of the paper product or packaging-like product, if the importer is resident in New Brunswick;*
- C. if there is no person described in clauses A or B, the retailer<sup>13</sup> (i.e., whether online or at a physical location) who supplied the paper product or packaging-like product to the consumer, regardless of the retailer's residency.*

*Also consistent with section 2(b.2), this Stewardship Plan defines the obligated producer of packaging using the following hierarchy:*

- A: For the portion of the packaging of a product that a brand holder added<sup>14</sup> to the product, the producer is:
  - a) the brand holder of the product, if the brand holder is resident in Canada.*
  - b) if there is no person described in subparagraph a), the importer of the product, if the importer is resident in New Brunswick*
  - c) if there is no person described in subparagraph a) or b), the retailer who supplied the product to the consumer.**
- B. For the portion of the packaging of a product that an importer of the product into New Brunswick added to the product, the producer is:*

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<sup>10</sup> A "brand holder" means a person who owns or licenses a brand or who otherwise has rights to market a product under the brand.

<sup>11</sup> "Resident in Canada" means having a permanent establishment in Canada whereby "permanent establishment" has the meaning as assigned in subsections 400 (2) and 2600 (200) of the [Income Tax Regulations \(Canada\)](#), in the case of a corporation and an individual respectively.

<sup>12</sup> "Importer" means a person resident in New Brunswick who imports designated packaging and paper into New Brunswick or is the first to take possession or control of packaging and paper in New Brunswick for which a brand holder resident in Canada does not exist.

<sup>13</sup> A "retailer" means a business that supplies products to consumers, whether online or at a physical location.

<sup>14</sup> A person adds packaging to a product if the person makes the packaging available for use by another person who adds the packaging to the product, causes another person to add the packaging to a product or combines the product and the packaging.

- a) *the importer of the product into New Brunswick, if the importer is a person who is resident in New Brunswick,*
- b) *if there is no person described in subparagraph a), the retailer who supplied the product to the consumer.*

C: *For any portion of the packaging not described in A or B above, the producer is the retailer (i.e., whether online or at a physical location) who supplied the product to the consumer, regardless of the retailer's residency.*

*Consistent with section 50.52(2) of Part 5.3 Packaging and Paper of the Designated Materials Regulation - Clean Environment Act, where the producer determined in accordance with the section is a business operated wholly or in part as a franchise, the producer is the franchisor<sup>15</sup> if that franchisor has franchisees that are resident in New Brunswick.*

*Consistent with section 50.52(1) of Part 5.3 Packaging and Paper of the Designated Materials Regulation - Clean Environment Act, the definition of producer in this section does not apply to a person in the following circumstances:*

- (a) the producer generates less than two million dollars in gross annual revenue in New Brunswick;*
- (b) the producer manufactures, distributes, sells or offers for sale less than one tonne of packaging and paper annually in New Brunswick; or*
- (c) the producer is a charitable organization registered under the Income Tax Act (Canada).*

*A brand holder resident in Canada that generates less than two million dollars in gross annual revenue in New Brunswick or manufactures, distributes, sells or offers for sale less than one tonne of packaging and paper annually in New Brunswick may volunteer to be the obligated producer for the packaging and paper it supplies into New Brunswick on behalf of the importer(s) of the brand holder's packaging and paper who would otherwise be the obligated producer.*

### **5.3 Estimated Quantities Available for Collection**

*Section 50.5 of Part 5.3 Packaging and Paper of the Designated Materials Regulation - Clean Environment Act defines "consumer" as "a person who uses packaging or paper for the person's own purpose, and not for the purpose of resale."*

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<sup>15</sup> "Franchisor" has the same meaning as in the Arthur Wishart Act (Franchise Disclosure), 2000.

*Consistent with the definition, this Stewardship Plan defines the quantities available for collection as packaging and paper that was supplied to a consumer for personal, family or household use.*

*Supplied or supply mean the sale, lease or donation, with transfer of possession or title, or otherwise made available or distributed including through, but not limited to, the use of a sales outlet, catalog, Internet web site or similar electronic means to a consumer in New Brunswick for personal, family or household use.*

**Table 5.3 Estimated Packaging and Paper Supplied to NB Consumers in 2020**

<b>Paper and Packaging Category</b>	<b>Estimated Paper and Packaging Supplied to NB Consumers in 2020 (tonnes)</b>
<i>Paper</i>	<i>27,320</i>
<i>Rigid Plastic</i>	<i>7,731</i>
<i>Flexible Plastic</i>	<i>3,631</i>
<i>Metal</i>	<i>2,604</i>
<i>Glass</i>	<i>3,714</i>
<i>Total</i>	<i>45,000</i>

## 6.0 Program Design

### 6.1 Principles

*The following principles have guided the development of the Stewardship Plan and will guide implementation of the Plan in New Brunswick:*

- **Focus on outcomes** – maximize recovery, maximize efficiency, enhance resident service levels;
- **Create inducements to drive outcomes** – provide economic incentives to achieve the outcomes;
- **Keep it simple** – simple rules will provide clarity to residents and to those collecting and processing the paper and packaging;
- **Foster innovation** – by applying procurement practices and establishing commercial relationships that deliver more value; and
- **Set the stage for evolution** – leverage existing packaging and paper systems in New Brunswick with continuous improvement in collection and post-collection effectiveness and efficiency over time.

## 6.2 Phasing

*The Regulation requires that the Stewardship Plan be implemented six months following plan approval. As this timeline does not accommodate the various commercial arrangements and adjustments that must occur, Circular Materials Atlantic is proposing a phased transition of existing services to producer responsibility and a gradual expansion of services.*

*The phased transition will occur:*

- *In sequence by groups of RSCs with approximately one-third of households in each group:*
  - *Group 1: RSCs 5, 6, 7 and 8 (materials are currently handled at ECO360 in Moncton);*
  - *Group 2: RSCs 2, 3, 4 and 11 (RSCs 2, 3 and 4 – materials are currently handled at Acadian Peninsula Recycling Centre in Tracadie; RSC 11 – materials are currently handled at Fredericton's MRF);*
  - *Group 3: RSCs 1, 9, 10, 12 (RSC 1 – materials are currently handled at L'Atelier des Copains, St. Francois, NB or Societe Via, Riviere de Loup, PQ; RSC 9 – materials are currently handled at Fundy Region Solid Waste Facility, Grand Bay-Westfield; RSCs 10 and 12 – materials are currently handled at Southern Valley Transfer Station, Woodstock and marketed by Scotia Recycling); and*
- *Within each group, in sequence by type of service:*
  - *First curbside and depot collection;*
  - *Followed by curbside collection service expansion; and*
  - *Followed by public space collection.*

*As required by the Regulation, transition will begin in RSC Group 1 six months following approval of the Stewardship Plan. Transition will begin in RSC Group 2 on the first day of the first month following twelve months after approval of the Stewardship Plan. Transition will begin in RSC Group 3 on the first day of the first month following eighteen months after approval of the Stewardship Plan.*

*The three RSC Groups are set out in the following table.*

**Table 6.1 RSC Groups for Transition**

Timing		Regional Services Commissions			
		#	Name	Total Households	Paper and Packaging Collected in 2020 (tonnes)
Group 1	Six months after approval of the Stewardship Plan	5	Greater Miramichi Regional Service Commission	8,666	1,514
		6	Kent Regional Service Commission	13,492	4,900
		7	Southeast Regional Service Commission	84,928	16,758
		8	Regional Service Commission 8	13,830	3,494
Total Group 1			120,916	26,666	
Group 2	The first day of the first month following 12 months after approval of the Stewardship Plan	2	Restigouche Regional Service Commission	11,300	435
		3	Chaleur Regional Service Commission	17,973	3,354
		4	Peninsule Acadienne Regional Service Commission	21,394	2,200
		11	Regional Service Commission 11	60,940	4,520
Total Group 2			111,607	10,509	

Timing		Regional Services Commissions			
		#	Name	Total Households	Paper and Packaging Collected in 2020 (tonnes)
Group 3	The first day of the first month following 18 months after approval of the Stewardship Plan	1	Northwest Regional Service Commission	28,446	1,700
		9	Fundy Regional Service Commission	49,094	5,932
		10	Southwest New Brunswick Service Commission	14,970	755
		12	Western Valley Regional Service Commission	16,925	759
Total Group 3			109,435	9,146	

As each RSC Group transitions, curbside and depot collection services will transition first. The time required to transition curbside and depot collection services in each RSC Group will be dependent on whether RSCs or lower tier municipalities choose to contract with Circular Materials Atlantic to provide curbside and depot collection services on behalf of Circular Materials Atlantic or whether Circular Materials Atlantic will procure (i.e. through tender, request for proposal, etc.) services from private service providers directly.

Where RSCs or lower tier municipalities choose to contract with Circular Materials Atlantic to provide curbside and depot collection services, the objective will be to have the commercial arrangements with these communities in place by the date on which the RSC Group transitions. Where Circular Materials Atlantic must procure service providers, transition of responsibility from the RSC or lower tier municipality will occur on the service commencement date of a contract awarded by Circular Materials Atlantic.

*During the transition of curbside and depot collection services in an RSC, Circular Materials Atlantic will work with the RSC to compile information on the households that are receiving curbside garbage collection services but do not receive collection of packaging and paper. Depending on the number and location of these households, Circular Materials may add these households to an existing contract with the RSC, an adjacent lower tier municipality or the vendor to whom a collection contract was awarded. Where this is not appropriate or not feasible, Circular Materials will procure a contractor to deliver curbside recycling collection services to the households.*

*Circular Materials Atlantic will also work with the RSC to compile information on the existing public space recycling collection systems. This information will be used to assess how to approach public space recycling to support the system for the collection of packaging and paper.*

*These three phases of collection service transition are as follows:*

### **Transitioning Residence and Depot Collection Services**

#### Curbside

*Municipalities or First Nations that execute an agreement with Circular Materials Atlantic to deliver curbside collection services for packaging and paper will be transitioned first. Where municipalities and First Nations contract with Circular Materials Atlantic to provide curbside and depot collection services, the objective will be to have the commercial arrangements with these communities in place by the date on which the RSC Group transitions.*

*Where municipalities choose not to execute an agreement with Circular Materials Atlantic to deliver curbside collection services for packaging and paper, Circular Materials will procure collection services. The time required for the procurement process and for the contractor to acquire collection vehicles will determine when curbside collection services in these municipalities will transition to Circular Materials Atlantic.*

#### Depot



*Depot collection services delivered by municipalities or First Nations that execute an agreement with Circular Materials Atlantic to deliver the required collection services for packaging and paper will be transitioned in parallel with curbside collection. Where municipalities and First Nations contract with Circular Materials Atlantic to provide depot collection services, the objective will be to have the commercial arrangements with these communities in place by the date on which the RSC Group transitions.*

*Circular Materials may contract with those operating private depots to accept certain materials not included in curbside collection systems (e.g. glass and flexible plastic packaging).*

### **Expanding Curbside Collection Services**

*When transition of existing curbside and depot collection services is complete in an RSC, Circular Materials will expand curbside collection services for residential packaging and paper to households receiving only curbside collection of garbage.*

*During this phase, support for depots accepting materials included in curbside collection systems may be discontinued in areas that are receiving curbside collection of packaging and paper.*

### **Transitioning Public Space Collection Service**

*When expansion of curbside collection services is complete in an RSC, public space collection services delivered by municipalities or First Nations that execute an agreement with Circular Materials Atlantic to deliver the required collection services for packaging and paper will be transitioned.*

*Should a municipality choose not to execute an agreement with Circular Materials Atlantic to deliver public space collection services for packaging and paper, Circular Materials will not deliver public space collection as the co-siting of recycling public space bins with garbage public space bins is critical to the effective operation of a recycling public space collection system.*

## **6.3 Collection System Relationships and Payments**

### **6.3.1 Single-Family and Multi-Family Dwellings and Schools**

*The RSC, local municipality or First Nation (the “entity”) that was delivering collection services to single-family and multi-family households when the Regulation was filed in October 2021, or the entity that has assumed responsibility for those households through the local government reform process, will have a right of first refusal to deliver those collection services under contract to Circular Materials Atlantic.*

*Circular Materials Atlantic will develop a master services agreement (MSA) and a statement of work (SoW) for curbside and depot collection services. Circular Materials will meet with the RSCs that are acting on behalf of RSCs as the point of contact for transition of services to review a draft MSA and SoW.*

*To establish payments to RSCs, local municipalities or First Nations, Circular Materials Atlantic will contract an independent accounting firm to meet with representative entities to compile information on residential collection costs associated with urban household collection, rural household collection, drop-off depot operation and mobile depot operation to support development of a payment model that will be incorporated into the SoW. The outcome of this research will be shared with the RSCs that are acting on behalf of RSCs as the point of contact for transition of services as part of their review of a draft MSA and SoW.*

*Where entities decline to contract with Circular Materials Atlantic to provide curbside collection services, Circular Materials Atlantic will procure curbside collection services from the private sector.*

*Circular Materials Atlantic may issue an RFP to solicit submissions from the private sector to deliver depot collection services through a direct contractual relationship with Circular Materials Atlantic or may negotiate delivery of these services.*

### **6.3.2 Public space**

*The RSC, local municipality or First Nation (the “entity”) that is delivering public space collection services, or the entity that has assumed responsibility for those public space locations through the local government reform process, will be offered a contract with Circular Materials Atlantic to support the recycling portion of the public space system.*

*Circular Materials Atlantic will develop a SoW for public space collection. The SoW will be provided to the four RSCs that are acting on behalf of all RSCs as the point of contact for transition of services RSCs for review.*

*Circular Materials Atlantic will contract an independent accounting firm to meet with representative entities to compile information on public space recycling collection costs incurred by entities under various circumstances, such as bins in areas with street-front retail shops and bins in municipal parks to support development of a payment model that will be incorporated into the SoW. The outcome of this research will be shared with the four RSCs that are acting on behalf of all RSCs as the point of contact for transition of services as part of their review of a draft SoW for public space recycling collection.*

*Should a municipality choose not to execute an agreement with Circular Materials Atlantic to deliver public space collection services for packaging and paper, Circular Materials will not deliver public space collection as the co-siting of recycling public space bins with garbage public space bins is critical to the effective operation of a recycling public space collection system.*

### **6.3.3 Remote and Rural Areas**

*Circular Materials Atlantic will support collection of packaging and paper in remote and rural areas through:*

- *Support for existing depots in the near term as described in section 6.3.1; and*
- *Over time, expansion of curbside recycling collection to households receiving curbside garbage collection as described in section 6.3.1.*

### **6.3.4 Communications to Residents**

*Local promotion and education will be included in the contracts with municipalities, First Nations and those awarded contracts through the RFP process to support the local curbside collection services. Circular Materials Atlantic will support these local communications by making standard messaging and graphics available in both official languages.*

*Once curbside collection in all three RSC Groups has transitioned, Circular Materials Atlantic will implement a province-wide communications strategy to raise awareness and address areas of confusion or common misunderstandings among residents about what to recycle or how to use the recycling system.*

#### **6.4 Post-Collection**

*Circular Materials Atlantic will assume responsibility for managing collected materials by:*

- *Contracting for receiving facilities which may directly transfer materials to another location or may precondition materials to allow certain materials to be shipped to markets and other materials to be shipped to processing facilities; and*
- *Contracting with processing facilities to sort and prepare material for shipment to markets.*

*Circular Materials Atlantic will undertake field assessments of the existing receiving and processing infrastructure during the period of plan development and during review of the plan by Recycle New Brunswick. The outcome of this assessment will determine:*

- *Whether each facility is capable, in its current configuration or through retrofitting, of providing the services required by Circular Materials Atlantic to meet the regulatory obligations of its subscribing producers;*
- *Whether direct negotiations with the owner of a facility will deliver the required services on acceptable commercial terms; or*
- *Whether Circular Materials will implement a procurement process to acquire receiving, consolidation, transfer, preconditioning and processing services in some or all of New Brunswick.*

#### **6.5 Efforts to Reduce and Improve Reusability and Recyclability**

*The cumulative effect of EPR policies as they are introduced across Canada is to internalize the externalities associated with waste. As these costs are internalized, producers will increasingly consider how to meet recycling targets for materials such as plastics by improving recyclability or alternatively employing reuse strategies.*

*As an example, many of the Circular Materials founding producers are party to the Consumer Goods Forum “Golden Design Rules” of which the latest iteration focuses on “eliminating unnecessary plastic packaging, by reducing headspace and plastic overwraps, as well as increasing recycling value in various types of plastic, including*

*PET thermoformed packaging, flexible consumer packaging and rigid HDPE and PP.*<sup>16</sup>

*Additionally, several Circular Materials founding producers are party to Loop – a global reuse platform that is currently piloting several packaging reuse programs for food and consumer products*<sup>17</sup>.

*Circular Materials Atlantic’s experience in operating a paper and packaging management system in New Brunswick in addition to its operation of packaging and paper EPR programs in other Canadian jurisdictions along with its collaboration with Éco Entreprises Québec will enable it to provide producers with real-time supply-chain feedback on how their packaging choices affect recyclability and recycling system cost.*

*Circular Materials Atlantic will be operating a province-wide supply-chain for the collection and management of packaging and paper materials and is open to exploring how it can support producers in the supply of reusable packaging systems should producers wish to do so.*

## **6.6 Current and Future Research and Development**

*Current research and development activities in New Brunswick were not identified during the process to compile baseline data set out in this Stewardship Plan.*

*Future research and development activities to support cost-efficient management of residential packaging and paper collected in New Brunswick will be identified through the processes to procure the collection and post-collection services required to implement the Stewardship Plan.*

## **7.0 Program Performance**

### **7.1 Accessibility**

*Circular Materials Atlantic will track the following accessibility metrics:*

- *Number of households receiving household collection services for packaging and paper;*

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<sup>16</sup> [Reducing the Complexity of the Recycling Process & Increasing Recycling Rates](#). Consumer Goods Forum 2021

<sup>17</sup> [Designed for reuse](#). Loop 2022

- *Number and location of depots accepting all types of residential packaging and paper; and*
- *Number and location of depots accepting the types of packaging and paper not accepted in commingled collection systems.*

## **7.2 Performance Measures and Targets**

*Circular Materials Atlantic will, within two years of the approval of the packaging and paper stewardship plan by Recycle New Brunswick, submit to Recycle New Brunswick proposed numerical performance targets for the following six categories of materials*

- *Paper;*
- *Paper packaging;*
- *Rigid plastic packaging;*
- *Flexible plastic packaging;*
- *Metal packaging; and*
- *Glass packaging.*

*The performance target for each category of material will be calculated as tonnes shipped to recycling markets by Circular Materials Atlantic divided by tonnes supplied to consumers by Circular Materials Atlantic's subscribing producers expressed as a percentage.*

## **7.3 Annual Reporting**

### **7.3.1 Information to be Included**

*Circular Materials Atlantic will include the following organizational information in its annual report:*

- *Board of Directors;*
- *Number of subscribing producers;*
- *Producer engagement activities;*
- *Municipal, First Nation and service provider engagement activities;*
- *Public education and awareness activities;*
- *Audited annual financial statements; and*
- *Assessment of the performance of the stewardship plan prepared by an independent auditor.*

*As services are transitioned. Circular Materials Atlantic will include the following operational information in its annual report:*

- *The quantity of packaging and paper supplied by subscribing producers in the following categories: paper, paper packaging, rigid plastic packaging, flexible plastic packaging, metal packaging and glass packaging;*
- *The number of households receiving collection of packaging and paper;*
- *The number of depots accepting residential packaging and paper;*
- *The number of public space recycling bin locations serviced;*
- *The total quantity of packaging and paper collected;*
- *The total quantity of paper, paper packaging, rigid plastic packaging, flexible plastic packaging, metal packaging and glass packaging directed to markets;*
- *The quantity of material directed to disposal; and*
- *GHG emissions related to supply chain operations, from collection through transport, storage and handling until material is received at end markets.*

*After the first year of operations, the annual report will include prior year data for purposes of year-over-year comparison.*

*The annual report will include a description of producer efforts to redesign packaging and paper, by material type, to improve reusability and recyclability where available from subscribing producers.*

### **7.3.2 Geographical Areas to be Utilized**

*Circular Materials Atlantic will report by the twelve RSCs and by the province as a whole.*

## **8.0 Administration of the Packaging and Paper Stewardship Plan**

### **8.1 Program Financing**

*Circular Materials Atlantic will recover program costs from its subscribing producers.*

*Circular Materials Atlantic will establish a fee-setting methodology for the purposes of calculating producer fee rates based on the following assumptions and principles:*

- *Fee rates will reflect the costs to deliver the services set out in this Stewardship Plan;*
- *Overhead costs shall be shared equitably by all subscribing producers;*

- *Costs to collect and manage each group of similar packaging and paper will be shared proportionately by subscribing producers supplying the packaging and paper;*
- *There will be no arbitrary cross-subsidization of costs among groups of similar packaging and paper;*
- *As a not-for-profit company, Circular Materials Atlantic will aim to minimize or avoid:*
  - *Operational losses (which, if they do occur, will be recouped in fee adjustments in subsequent fee periods);*
  - *Operational surpluses (which, if they do occur, will be accounted for in fee adjustments in subsequent fee periods);*
- *Cost and commodity revenue components, the methodology to allocate costs and commodity revenue to groups of similar packaging and paper and the fee setting process will be communicated to subscribing producers; and*
- *Fee rates for each group of similar packaging and paper will be charged in a non-discriminatory manner to all subscribing producers.*

## **8.2 Dispute Resolution**

*If a Dispute arises between a producer or a contracted service provider and Circular Materials, the party seeking resolution of the Dispute may initiate Dispute Resolution by way of the following steps.*

### **Step 1: Notice of Concern**

*If a Dispute arises which the staff representatives of each party have been unable to resolve through discussion, the party wishing to initiate the Dispute Resolution procedures must raise the matter with the other party in writing by sending an email to the address in the notice section of the applicable producer or contractor agreement summarizing the nature of the Dispute, the key facts, and attaching any relevant documentation.*

### **Step 2: Informal Discussion**

*Within 30 days of receipt of the written notice under Step 1, the parties will meet to:*

- i. clarify the nature of the Dispute;*
- ii. request any further documentation in relation to the Dispute; and*
- iii. arrange for and facilitate a meeting to attempt in good faith to resolve the Dispute with representatives of the producer and Circular Materials.*



### **Step 3: Management Discussion**

*If the Dispute remains unresolved following the Informal Discussion, one of the parties may, within 30 days of the completion of the Informal Discussion, send an email to the address in the notice section of the applicable producer or contractor agreement summarizing the aspects of the Dispute which remain outstanding following the Informal Discussion.*

*Within 30 days of receipt of such written notice, the parties will arrange for and facilitate a meeting between senior representatives of the producer or contractor and Circular Materials Atlantic to attempt in good faith to resolve the Dispute.*

### **Step 4: Arbitration**

*Should the previous three steps not result in resolution of the dispute, a party may utilize the arbitration provisions that are in the contract between Circular Materials Atlantic and a subscribing producer and in the contract between Circular Materials Atlantic and a service provider.*

*Any arbitration will occur under the Arbitration Act (New Brunswick), RSNB 2014, c 100, and the legal seat and location of arbitration shall be Fredericton, New Brunswick, Canada. The arbitral tribunal shall be comprised of one arbitrator. Within thirty (30) days of receipt of a party's request for arbitration, the parties shall jointly agree upon an arbitrator. If the parties cannot agree on an arbitrator, each party shall submit two names of potential arbitrators, and the identity of the arbitrator shall be chosen from the four possible names by random draw observed by both parties.*

*An arbitration shall be scheduled to take place on a date to be determined by the arbitrator, in consultation with the parties who shall divide the time equally to present their positions to the arbitrator. The decision of the arbitrator shall be final and binding. Each Party shall bear its own costs of the arbitration and shall share equally the fees and disbursements of the arbitral tribunal and any other related costs of the arbitration, regardless of the outcome. The arbitrator shall have no jurisdiction to award costs in favour of either party.*

### **8.3 Greenhouse Gas Emission Impacts**

*Greenhouse gas emissions related to packaging and paper are generated throughout processes to extract raw materials (e.g. natural gas, wood, silica, bauxite*

*etc.) through to the production of materials (respectively polymers, paper, glass, aluminum etc.) and to the formation of packaging and paper products.*

*Recycling materials significantly mitigates greenhouse gas emissions by displacing the extraction and energy intensive processing of raw materials with recycled materials.*

*However, the collection and recycling of materials (“recycling system”) itself generates greenhouse gas emissions. These are related to collection, transportation, sorting and whatever mechanical and chemical methods are required to render sorted materials suitable for manufacturing of products and packaging.*

*Circular Materials Atlantic’s objectives will be to minimize recycling system-related greenhouse gas emissions by:*

- *Optimizing the movement of materials including collection route optimization and logistics for consolidating, transferring, and processing materials where those systems are powered by fossil fuels;*
- *Encourage the use of renewable energy to power logistic systems;*
- *Use contract-based performance standards to incentivize collection and sorting systems that maximize the collection of materials and minimize contamination;*
- *Selecting recycling processes that:*
  - *Maximize yield of recycled materials that displace the use of raw materials in manufacturing; and*
  - *Minimize consumption of non-renewable energy.*

*Circular Materials Atlantic will work closely with EEQ to integrate recycling supply-chains with those in Quebec to drive the scale necessary to warrant investments in technological innovation for harder-to-recycle materials such as flexible plastics. Such efforts will increase recycling rates while minimizing greenhouse gas emissions.*

#### **8.4 Plan for Elimination or Reduction of Environmental Impacts**

*An EPR-based system for the collection and management of packaging and paper is primarily focused on the supply-chain to maximize environmental outcomes associated with the recycling of materials that comprise packaging and paper.*

*However, an additional feature of an EPR-based system is the ability to inform producers of the performance of their packaging choices within the recycling system.*

*Materials that are harder to collect, sort and recycle attract increased system costs which are reflected in fees producers pay to cover their materials' collection and management costs. This financial feedback then informs producers of the end-of-life cost of their packaging choices.*

*Producers then can decide to reduce such cost by working with Circular Materials Atlantic to ensure its collection and management system makes the requisite investments in collection, sorting and recycling innovation that leads to higher recycling rates and lower costs over time or by redesigning their packaging to facilitate collection, sorting and recycling<sup>18</sup>. Often both strategies are required in parallel.*

*Circular Materials Atlantic will be employing a fee-setting methodology that will provide feedback to producers about the relative performance of their packaging choices in its collection and management system and will collaborate with them to evolve a recycling system that aids in minimizing the life-cycle environmental impacts of packaging and paper.*

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<sup>18</sup> Canadian Companies Tackle Plastic Packaging Waste With the Golden Design Rules Supported by the Canada Plastics Pact <https://plasticspact.ca/canadian-companies-tackle-plastic-packaging-waste-by-supporting-golden-design-rules/>

**Appendix A – Circular Materials Atlantic Subscribing Producers**

*To be completed following consultation*

**Appendix B – Consultation Summary**

*To be completed following consultation*

DRAFT FOR CONSULTATION