



#	Question	Circular Materials' Response
1.	Will these slides be shared with attendees?	Yes, the presentation was sent out to stakeholders in advance of the consultation webinar and is available on the Circular Materials website at www.circularmaterials.ca/newbrunswick .
2.	Is this timeline for 2022 or 2023?	The timeline shown on slide 13 is for 2022.
3.	When would you know if your Stewardship Plan is accepted by the province?	<p>We have been given no guidelines as to how long Recycle NB will need to review and approve the New Brunswick Stewardship Plan for Packaging and Paper. We will keep producers informed of developments on the process.</p> <p>The transition to EPR is to begin six months following approval of the Stewardship Plan by Recycle New Brunswick.</p>
4.	Can you please clarify the definition of Transport Packaging? Footnote 8 in the Stewardship Plan seems to add more confusion: <i>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.</i>	<p>Only Transport Packaging that is supplied to consumers for their personal, family or household purposes would be required to be reported to Circular Materials. This is further defined in the New Brunswick Registration and Account Creation Guidebook, which can be found under 'Resources' on the Producer Portal:</p> <p><i>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.</i></p> <p><i>Transport packaging is not typically provided with products that are supplied to consumers for their personal, family or household purposes, although there are some instances where this may occur. For example, when products are shipped directly to a consumer's residence, transport packaging as described above may be used to facilitate the delivery of such products.</i></p> <p><i>More commonly, transport packaging used to deliver products to a retailer is removed prior to displaying the product on the store shelves. Transport packaging that is never supplied to consumers for their personal, household or family purposes is not designated under the Regulation and Stewardship Plan.</i></p>



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		The definition of Transport Packaging used in the NB Stewardship Plan aligns with Ontario's reporting categories.
5.	To clarify, pallets and stretch wrap or possibly corrugate boxes that are shipped to the customer, but not the consumer are exempt?	Transport Packaging that is managed by a retailer and is not supplied to a residential consumer would be considered institutional, commercial and industrial (IC&I) material and would not be a designated material under the New Brunswick Regulation or Stewardship Plan.
6.	I think the clarification around the transport packaging will be critical. Most companies, even for e-commerce, are not shipping materials that have bale or pallet wrap. If it's included in the definition, then it seems to imply back of store.	Thank you for your feedback. We will consider this as we finalize the Stewardship Plan.
7.	Are the exemptions clauses an "or"? or must all clauses be met to be exempt?	The producer exemption clauses are "or", meaning you are an exempt producer if you meet any of the below thresholds: <ul style="list-style-type: none"> • Generate less than two million dollars in gross annual revenue in New Brunswick; or • Manufacture, distribute, sell or offer for sale less than one tonne of packaging and paper annually in New Brunswick; or • Are a charitable organization registered under the Income Tax Act (Canada).
8.	Are there any other PROs submitting plans in NB?	To our knowledge there are no other Producer Responsibility Organizations (PROs) submitting a New Brunswick Stewardship Plan for Packaging and Paper.
9.	Do you have any insight into how long you would be given to amend your plan if the province requires changes?	Recycle NB will determine how long we will have to make amendments to the Stewardship Plan should we need to do so. We are working with Recycle NB to ensure the Stewardship Plan meets the requirements of the Regulation.
10.	Are there guidelines on estimating quantities of packaging supplied to NB in 2021 if packaging weights are unknown?	These guidelines will be detailed in the New Brunswick Reporting Guidebook that will be available prior to September 1, 2022, when the Producer Portal opens for reporting.



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11.	Your plan seems very high level. How much detail does the province expect?	While we can't comment on Recycle NB's expectations, we are following the guidelines that have been set out for developing a New Brunswick Stewardship Plan for Packaging and Paper.
12.	Has the reporting format been finalized? Is there a template available for producers to prepare the data ahead of time?	The reporting format for New Brunswick has not yet been finalized, but we will be providing producers with access to the Producer Portal in advance of it opening for reporting on September 1, 2022. The reporting format will be very similar to reporting for Ontario.
13.	How will CMA work with EEQ for post-collection services?	We are working with EEQ in evaluating opportunities for shared downstream processing infrastructure to create efficiencies.
14.	Will existing methodologies used across the country (ex. industry calculators) be allowed for estimating material weights?	Guidelines around methodologies will be detailed in the New Brunswick Reporting Guidebook that will be available prior to September 1, 2022, when the Producer Portal opens for reporting.
15.	Can you confirm when producers will pay fees for the program, is it 2023 or 2024?	<p>If Recycle NB approves the Stewardship Plan before July 1, 2023, Circular Materials will begin transition in 2023 (six months following plan approval) and producers will pay fees in 2023 based on their 2022 supply of packaging and paper to New Brunswick consumers.</p> <p>If the Stewardship Plan is approved after July 1, 2023, Circular Materials will begin transition in 2024 and we will update producers with the timing of fees.</p>
16.	Will it be the same reporting portal as Ontario, and will we be able to all enter the data at one time?	<p>Yes, it will be the same Producer Portal for both New Brunswick and Ontario. You will need to submit each report separately within the Portal. Reporting timelines for New Brunswick and Ontario are similar:</p> <ul style="list-style-type: none"> • New Brunswick: September 1 – October 31, 2022 • Ontario: September 1 – October 14, 2022 (shorter timeline to accommodate Circular Materials reporting to the Resource Productivity and Recovery Authority by October 31 on behalf of producers)
17.	Where can the guidebook be found?	New Brunswick guidebooks can be found under the 'Resources' section of the Producer Portal. The Registration and Account Creation Guidebook is currently available. The New



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		Brunswick Reporting Guidebook will be available prior to producer reporting starting September 1, 2022.
18.	Are there any major differences in obligated materials between here and other provinces?	<p>We aligned the designated material list with Ontario as much as possible. There are two differences between the provincial obligated materials lists:</p> <ul style="list-style-type: none"> • There is no beverage-specific reporting in New Brunswick like there is in Ontario to reflect New Brunswick's deposit system, and • There are slight differences in packaging-like products set out in the respective provincial regulations.
19.	Will there be a way to ensure packaging is not paid for twice? For example, by a producer and then by a retailer?	We recommend reviewing the producer hierarchy. Retailers should only report their own branded material or material for which the retailer is the importer when there is no brand holder resident in Canada, including any packaging that is added to a product by a retailer when it is supplied to a consumer (e.g., flyers, plastic bags, private label packaging, etc.).
20.	If the program begins mid 2023, will the fees be prorated for 2023?	2023 fees will be reflective of the cost we would incur for the length of time the program is in operation once the Stewardship Plan is approved by Recycle NB. For example, if the program begins in July 2023, producer fees will be pro-rated to reflect this date. Our expectation is that 2023 fees will be lower than those in 2024 when more of the supply chain transitions to the new program.
21.	Is it your sense that the province will accept the transition timetable you have put forward?	<p>We provided an early draft of our Stewardship Plan to Recycle NB for feedback and they did not provide comments on our proposed transition timeline. Stakeholder views on the proposed transition timetable may be a factor in Recycle NB's assessment.</p> <p>We will be consulting and collecting feedback from New Brunswick municipalities, First Nations communities and Regional Service Commissions (RSCs). This feedback will help us finalize the proposed transition timeline that we submit to Recycle NB for approval.</p>
22.	Can you elaborate on the real time feedback to producers on their packaging that was mentioned?	Our objective is to periodically provide producers with information through the Producer Portal on the quantity of materials collected and managed rather only through an annual report.



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23.	Could the province say transition all areas within six months?	Yes, Recycle NB could ask that we transition all RSCs within six months. We are proposing that a phased transition approach occur in sequence by groups of RSCs followed by sequence by type of service. This approach will be more manageable logistically and ensure a seamless transition.
24.	Do you have any estimate of what total system costs for the New Brunswick program might be?	At this point we do not have a reliable estimate around system costs in New Brunswick.
25.	Does that mean that different packaging could have different rates?	Yes, different materials typically carry different fee rates that reflect their characteristics, costs for collection and processing and differing commodity values.
26.	Will producers get an opportunity to comment and participate in the fee setting process?	We will be transparent in the approach being used for calculating producer fees. There will be opportunity for producer input during development of the fee-setting methodology.
27.	Will the recovery performance be provided in greater detail to producers? For example, the recovery rate of PET rather than a recovery rate of Rigid Plastic?	We are evaluating ways to provide producers with information through the Producer Portal on the quantity of materials managed.
28.	We want to use recovery performance to help inform our packaging design changes.	Thank you for your feedback. We will take this into consideration as we evaluate ways to provide producers with information through the producer portal on the quantity of materials managed.
29.	Will fees be reduced because the same portal will be used in multiple provinces?	Using the same Producer Portal for reporting in multiple provinces makes it easier for producers to submit their provincial reports creating cost efficiencies for the producer. Using the same Producer Portal, with customization for each province, also creates cost efficiencies for the Portal. However, the cost of the Producer Portal reflected in producer fees is very minimal compared to the costs of collecting and managing the designated materials by contracting for a supply chain.



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Producer Consultation on the New Brunswick Stewardship Plan for Packaging and Paper Q&A

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30.	Will business to business sales be treated differently than business to customer sales?	Packaging and paper product is designated if it is supplied to consumers for personal, family or household use. Please contact us directly to discuss your circumstances so that we can provide a response specific to your business context.
31.	What data security safety nets are provided by the portal?	Circular Materials is applying industry best practices to its data security systems. An overview of how we are ensuring producer data security will be available in the Producer Portal in the coming weeks.
32.	Are we going to be asked to explain differences that result in a total difference of less than \$10K? Stewardship Ontario requested explanations for changes that resulted in changes of less than \$10K. It's a lot of work for a small amount of difference.	We are committed to meeting the needs of producers and minimizing the administrative burden wherever we can. We will take this into consideration, but it is outside of the scope for the Stewardship Plan consultation.