

#	Question	Circular Materials' Response
1.	Can you give examples of items that some Regional Service Commissions (RSCs) are accepting that are not included in the definitions of PPP?	Some examples of items currently accepted for recycling that are not considered packaging and paper under the Stewardship Plan include durable products like baby bottles, durable storage containers and books.
2.	Can you confirm the number of households in the Greater Miramichi RSC?	There were some discrepancies when compiling the data for Greater Miramichi that we are working to resolve. Please review the baseline data within the Stewardship Plan and provide any updated data with your feedback to ensure we have the correct information before we submit the plan for approval.
3.	What was the rationale for using 2020 as the base year for data?	We began the development of the Stewardship Plan at the end of 2021. We used 2020 data as our baseline as it was the last complete year of data available. Please review the baseline data within the Stewardship Plan and provide any updated data with your feedback to ensure we have the correct information before we submit the plan for approval. Once the program is implemented, we will be compiling real-time data.
4.	That number for Greater Miramichi is incorrect. It is around 18,900.	Thank you. The number 8,666 in Table 1 for RSC 5 will be corrected to 17,331 households.
5.	When would you see full-time curbside collection throughout the province?	Expansion of curbside collection services to households receiving curbside garbage collection will occur once transition of existing curbside and depot collection services is complete in an RSC group. Those areas that do not receive curbside garbage collection will be eligible for depot service.
6.	During the transition period for RSCs starting later after the approval - for example 12 or 18 months later - will there be any financial compensation?	Financial compensation will be provided to RSCs that are under contract with Circular Materials. For example, if you are an RSC transitioning 12 months after approval of the Stewardship Plan and have signed a contract with Circular Materials to provide services, you will receive financial compensation when your transition begins.



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7.	What is your plan for schools and multi-unit residential properties?	Schools and residences, including residences in multi-family buildings, are obligated under the Regulation and collection services will be provided to these through contracts with municipalities or private companies.
8.	Will multi-layer packaging be included in PPP program products? Or accepted products?	Multi-layer packaging is included as designated material in the Stewardship Plan. We have not yet determined how multi-layer packaging will be accepted (e.g. through curbside or depot collection).
9.	Will compostable packaging be included in accepted products?	We are not planning to collect compostable packaging. Mixing compostable packaging with recyclable materials introduces contamination of the recyclable materials.
10.	Can you confirm that no region will see a diminution of service?	RSCs offering curbside collection services can either continue providing collection services via a contract with Circular Materials, or Circular Materials will procure the services independently and offer curbside collection without the involvement of the RSC.
11.	If a brand doesn't sign with Circular Materials Atlantic, who will be the agent for that brand?	The Regulation requires brand owners to consult on and submit a Stewardship Plan or designate an Agent to act on their behalf to meet their obligations. As of right now, Circular Materials is the only producer responsibility organization planning to submit a Stewardship Plan in New Brunswick. To be compliant with the Regulation, brand owners will need to be represented by Circular Materials.
12.	Is there a reason the tonnage of recycling given in the various RSC Annual Reports varies from those given in the Stewardship Plan?	We began the development of the Stewardship Plan at the end of 2021 and used 2020 data as our baseline as it was the last complete year of data available. Please review the baseline data within the Stewardship Plan and provide any updated data with your feedback to ensure we have the correct information before we submit the plan for approval.
13.	Does the plan guarantee that every household in the province will have access to curbside collection?	We will expand curbside collection services to households receiving curbside garbage collection. Any households that do not receive curbside garbage collection will be eligible for depot service expansion.



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14.	Why not start the transition of the whole province at the same time?	The six months set out in the Regulation for implementation following plan approval is insufficient to make all the arrangements necessary to transition services for the entire province. We are proposing a phased approach to transition to ensure there is no disruption to residential collection services and provide time for Circular Materials, municipalities, First Nations communities, RSCs and their contractors to prepare.
15.	Is there any language in the Stewardship Plan to ensure that material from New Brunswick is processed in the province?	Processing locations will be determined based on cost, access to facilities, and the infrastructure and technology used. We expect that some materials will be processed in New Brunswick, while other materials with no local processers may be processed in other jurisdictions.
16.	With curbside collection, will existing bins or carts be purchased from the RSCs or municipalities that currently own these bins or carts?	We do not intend on purchasing existing bins or carts from municipalities, First Nations communities or RSCs. Where Circular Materials contracts with the municipality for collection services, the existing bins or carts can continue to be used. If Circular Materials is procuring collection services, we'll be asking service providers to procure collection containers if he existing collection containers are not appropriate for the new service to be provided.
17.	How are landfill operators and compost plant operators compensated to manage PPP material ending up in the wrong stream?	Landfill and compost plant operators will not be compensated for material ending up in the wrong stream. We are designing a program where residents will have the opportunity to recycle materials through a consistent province-wide collection system. Promotion and education initiatives will support residents in understanding what and where they can recycle to help reduce materials ending up in the wrong stream.
18.	When are the field assessments of existing infrastructure planned to be completed?	Field assessments of existing facilities will be completed in the fall.
19.	All residents of New Brunswick will be paying a surcharge on their packaging yet will not be receiving the service until up to 18 months later than others, is that correct?	Extended producer responsibility (EPR) makes producers financially responsible for the collection and processing of their packaging and paper materials. Producers typically do not include a surcharge on these materials at point of sale, however the recycling cost may be an input producers use when determining consumer prices on their products.



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		The 18-month timeline is intended to ensure the transition to EPR in New Brunswick is seamless for residents.
20.	Municipalities, First Nations and RSCs are all used to communicating with their residents. The transition will create some communication issues as we will need to re-educate our public to what is now accepted in their recycling. The plan mentions providing P&E materials in both languages, but do you also plan to offer compensation as we will need to modify, print and mail new sorting lists, and create/manage other campaigns (radio, social media, etc.)?	We will be engaging with municipalities, First Nations communities and RSCs to understand what promotion and education methods have been successful and are desired moving forward. Based on this information, we will provide a range of promotion and education assets to support transition communications to residents. A component of compensation specifically for local promotion and education will be part of the payment offer to municipalities.
21.	Wondering who the four RSCs are that will be acting on behalf of all RSCs as the MSA and SoW are developed, and the transition of services begins?	The four RSCs that are referred to in section 6.3.2 of the Stewardship Plan are Chaleur RSC, Southeast RSC, Fundy RSC and RSC #11. These RSCs are acting as a transition working group and asked to be a source of contact during transition. Other RSCs will not be excluded from communications around MSA and SoWs.
22.	What about the Amazons of the world?	If an e-commerce brand owner is obligated, they are required to participate in the program and pay their fair share of costs to operate packaging and paper recycling services.
23.	It should be mentioned somewhere in the plan that there are two RSCs (Acadian Peninsula and Kent) that manage collection on most of their territories. They should be approached by Circular Materials when collection processes are discussed. We don't want them to be put aside and skip to municipalities instead.	Thank you for your feedback. We want to ensure anyone that is currently involved in providing collection services has an opportunity to continue providing services should they choose to do so.



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24.	How many staff do you plan to have in New Brunswick?	We will have staff located in New Brunswick to work with contractors and supply chain partners to ensure the program is operating effectively. The exact number of staff in New Brunswick has not yet been determined. Corporate functions staff (e.g., finance, producer relations, etc.) are based at our headquarters in Ontario, as they work to support producer responsibility programs across Canada.
25.	Can you guarantee that no material will be sent overseas for processing or recycling?	We will manage as many materials as possible locally. Based on the infrastructure available, we may need to seek material management options elsewhere, either domestically or in the USA, for certain materials. For example, there are local processors for fibres, domestic processors for metals, and processors in Atlantic Canada, Quebec and Ontario for plastics.
26.	When can we expect further consultation with RSCs?	We welcome the opportunity to meet with municipalities, First Nations communities and RSCs during the consultation period to review the content of the Stewardship Plan in more detail and receive feedback on its contents. Please reach out to schedule a meeting with our team or if you have any questions: info@circularmaterials.ca .
27.	Can you explain why paper does not include books? Will there possibly be another plan for books?	The Regulation outlines the obligated materials for the packaging and paper program. Books are not an obligated material. Books are challenging to recycle due to the nature of the covers and bindings.