



STEWARDSHIP PROGRAM PLAN FOR DESIGNATED AGRICULTURAL PLASTICS

Regulation: Packaging and Printed Paper Stewardship Regulation
195/2008

Submitted to: Manitoba Conservation and Climate

Version: Final

Date submitted: April 8, 2021

Program duration: April 1, 2021 to March 31, 2026

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1. Introduction

Since 2013, Cleanfarms has operated a government-funded ag plastic collection program in Manitoba and collected 135,000 kilograms of material.

Starting in late 2018 and at the request of the Manitoba government, Cleanfarms began the process of helping the province evaluate transitioning the government-funded agricultural plastics (ag plastics) pilot projects into a permanent, industry-funded stewardship program. This has resulted in the following stewardship program plan for designated ag plastics which will be referred to as the 'Manitoba Ag Plastics Plan' (MAPP).

The MAPP was developed in accordance with requirements set out in the Packaging and Printed Paper Stewardship Regulation 195/2008 ("the Regulation") enacted under the Waste Reduction and Prevention (WRAP) Act.

Version Control

It is anticipated that this document will undergo changes throughout the consultation and approval process. This section is intended to assist with version control.

- This is the final version of this document.
- Version 02 was submitted to government on January 29, 2021 and made available on Cleanfarms' website.
- Version 01 was submitted to government on November 30, 2020 and made available on Cleanfarms' website.

2. Program synopsis

This section provides a high-level summary of how the Manitoba Ag Plastics Plan (MAPP) will operate, the roles and responsibilities of the stakeholders involved, important dates and key principles that were factored into the development of the MAPP.

Designated materials - What's In & What's Out

Once approved, the MAPP will be the second provincially-regulated agricultural plastics stewardship program available in Canada and the first one to include multiple designated materials. (The first provincially-regulated program began in Saskatchewan in 2018 and targets grain bags only.)

Feedback from stakeholders suggests a desire for a convenient and accessible program that will target a variety of ag plastics including grain bags, baler twine, silage film, bale wrap and netting.

Because of limited recycling markets (a global phenomenon) and the low volumes of materials available for collection in Manitoba (compared to the potential volume available for collection if a similar program was available across the Prairies or across Canada), Cleanfarms will follow a phased in approach to designating materials to be included in the MAPP based on the availability of recycling markets and economies of scale.

Recycling markets are presently available for grain bags and baler twine, which are the two designated materials proposed for Phase I. All other items are excluded. As recycling markets develop for other types of ag plastics, Cleanfarms will apply to amend the MAPP to designate additional types of ag plastics. Based on current trends, Cleanfarms anticipates that recycling markets may become available for items like silage film and bale wrap in the future and therefore the next phase of the MAPP will likely include grain bags, baler twine, silage film and bale wrap.

| Phase | Designated Materials (What's in) | Excluded Materials (What's out) | Start date |
|-------|--|---|---------------|
| I | <ul style="list-style-type: none"> • Grain bags aka grain storage bags • Baler twine | <ul style="list-style-type: none"> • Silage film • Bale wrap • Netting | April 1, 2021 |
| II | <ul style="list-style-type: none"> • Phase I Designated Materials • Silage film • Bale wrap | <ul style="list-style-type: none"> • Netting (see section 4.2.2) | tbd |

Collection system

The collection system for ag plastics under the MAPP will be very similar to what has been in place through the pilot programs (2013 to March 31, 2021). Farmers prepare the designated materials on farm (by machine rolling grain bags or storing baler twine in plastic collection bags) and bring their prepared designated materials to an authorized collection site. There are no user fees at the collection site. Cleanfarms then arranges for the pickup, transportation and recycling of the designated materials.

Shared responsibility

The MAPP is based on a shared responsibility model where stewards, consumers (farmers/producers), and government all have a role to play.

- Stewards/first sellers are responsible for providing the collection and recycling program that will manage all designated materials.
- Stewards/first sellers are responsible for ensuring that an Environmental Handling Fee (EHF) is applied to designated materials and for remitting the funds to Cleanfarms to cover all aspects of the program.
- Consumers, in this case farmers/producers, are responsible for preparing and dropping off their designated materials at a designated collection site and ultimately pay the EHF.
- Cleanfarms (the Producer Responsibility Organization) is responsible for ensuring the items will be recycled or managed responsibly in accordance with the pollution prevention hierarchy and to ensure no unacceptable health and safety risk.
- Government is responsible for approving the MAPP and assisting with steward/first seller compliance and enforcement.

Program financing - Environmental Handling Fees

Like many Manitoba stewardship programs, the MAPP is funded through an Environmental Handling Fee (EHF) that is applied to designated materials.

Estimated EHF:

- Grain bag EHF: \$250/tonne
- Baler twine EHF: \$330/tonne

Key dates

The following dates are relevant to the consultation process and the launch of the MAPP.

- Initial consultations with key stakeholders – December 2018
- Quantitative grower survey fielded – January & February 2019
- Preliminary program plan consultations with key stakeholders – September – December 2020
- Submission of draft program plan (version 01) to government – November 30, 2020
- Draft program plan (version 01) available for comment – November 30, 2020 – January 12, 2021
- Submission of draft program plan (version 02) to government – January 29, 2021
- Ministerial approval of the program plan – March 31, 2021
- Close of government funded pilot projects – March 31, 2021
- Program start – April 1, 2021
- Implementation of the EHF – December 1, 2021

Harmonization – working towards a Prairie-wide approach

Starting in 2018, Cleanfarms began operating Canada's first provincially regulated ag-plastic stewardship program for grain bags in Saskatchewan. The Saskatchewan program impacts companies (stewards or first sellers) that do business across the Prairies and who are also impacted by the MAPP. Although the MAPP will be operated in a different jurisdiction (Manitoba) and under a different regulation, the MAPP has been designed to promote harmonization for industry stewards.

Manitoba farmers who are also impacted by programming available within and exterior to the province, have also expressed an interest in seeing the MAPP harmonized as much as possible with regulated or potentially-regulated programs in Saskatchewan and Alberta.

3. Organizational structure

This section outlines how stewards of designated ag plastics obligated under the Regulation to finance and support the MAPP (or operate their own stewardship program) will be represented through Cleanfarms and can provide feedback into the organization. It also outlines how affected stakeholders will be able to provide input into the MAPP.

3.1. Cleanfarms

Cleanfarms is a not-for-profit industry stewardship organization that operates under Canada's Not For Profit Corporation's Act.

Cleanfarms delivers a number of other industry-funded stewardship programs for items like pesticide containers, fertilizer containers, seed bags, pesticide bags, fertilizer bags, unwanted pesticides and old/expired animal health medications across Canada. In 2018, Cleanfarms began operating Canada's first provincially regulated stewardship program for grain bags in the province of Saskatchewan.

Cleanfarms is governed by a private-sector Board. Membership in Cleanfarms is open to companies whose products or packaging fall under the programs the organization operates. Annual Reports are available at www.cleanfarms.ca.

In Manitoba, Cleanfarms is recognized as the Producer Responsibility Organization that operates the approved stewardship program plan for empty pesticide and fertilizer containers under The Waste Reduction and Prevention (WRAP) Act.

3.2. Steward of Designated Ag Plastics - First Sellers

The Regulation states that a "steward of designated material" means:

- (a) The first person who, in the course of business in Manitoba, supplies a designated material to another person; or
- (b) A person who, in the course of business in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba.

For the purpose of harmonization with Saskatchewan's regulated grain bag recycling program (see section 3.2.1), 'stewards of designated materials' are referred to as "first sellers" throughout this document.

All first sellers of ag plastics will be eligible to join Cleanfarms to meet their regulatory requirements. First sellers can include manufacturers, distributors and retailers obligated under the Regulation.

The MAPP also allows for voluntary first sellers. Voluntary first sellers are companies or persons who may not meet the definition of a "steward of designated material" under the Regulation to assume the responsibilities (usually reporting and EHF remittance) on behalf of a company or person who meets the definition of a steward of designated materials.

3.2.1. *Minimizing red tape for stewards of designated ag plastics*

Cleanfarms operates Canada's first provincially-regulated, industry-funded ag plastics program under *The Agricultural Packaging Product Waste Stewardship Regulation* (in Saskatchewan). The following companies work with Cleanfarms to deliver this Saskatchewan-based program and meet their regulatory obligations through membership in Cleanfarms:

- Amity Welding & Fabrication Inc.
- Berry Global
- Bridon USA
- Canadian Tarpaulin Manufacturers Ltd.
- Committed Ag Supply
- FLAMAN Group of Companies
- GBC Equipment
- Kingdom Advance Group
- Neeralta Manufacturing Inc.
- Tama Canada Ltd.
- Thunderstruck Ag Equipment
- Veikle Agro Inc.

Many of these companies are stewards of designated materials (see next section) and will have regulatory obligations in Manitoba when the MAPP is approved. Cleanfarms' programs are designed to promote harmonization across multiple jurisdictions to minimize red tape for these stewards.

3.3. *Cleanfarms' Governance model*

The key committees in this section make up Cleanfarms' governance model and are relevant to the MAPP:

3.3.1. *Board*

The Cleanfarms Board provides overall strategic direction to the organization and its activities consistent with its mission and Articles of Incorporation.

3.3.2. *Western Canada Agricultural Stewardship Committee*

First sellers of ag plastics who are Cleanfarms members will form the Western Canada Agricultural Stewardship Committee (WCASC), a committee which will provide oversight and feedback to Cleanfarms staff.

The WCASC is presently (as of January 2021) named the Saskatchewan Agricultural Stewardship Council (SASC) and oversees Saskatchewan's grain bag recycling program. The SASC's mandate will be expanded to include responsibilities for the MAPP and the committee's name will be changed to the WCASC when MAPP is approved.

The WCASC will be a committee of the Cleanfarms Board. The WCASC will be organized through a Terms of Reference (draft in Appendix A) which will outline the purpose, structure and decision-making process for the committee.

All first sellers will be eligible to sit on the WCASC, although they will not be required to do so.

3.3.3. *Manitoba Advisory Committee*

A Manitoba-based advisory committee will also be formed to provide advice and recommendations to the WCASC. This advisory committee will help ensure that the resulting programming meets the needs of and provides value to the various stakeholders who play a role in it.

A Terms of Reference will be developed to better outline the advisory committee’s purpose, composition and membership. It is expected that membership will include representatives of the provincial government, rural and municipal associations and farmer/producer groups.

3.3.4. Staff

Cleanfarms staff are responsible for day-to-day operations of the program.

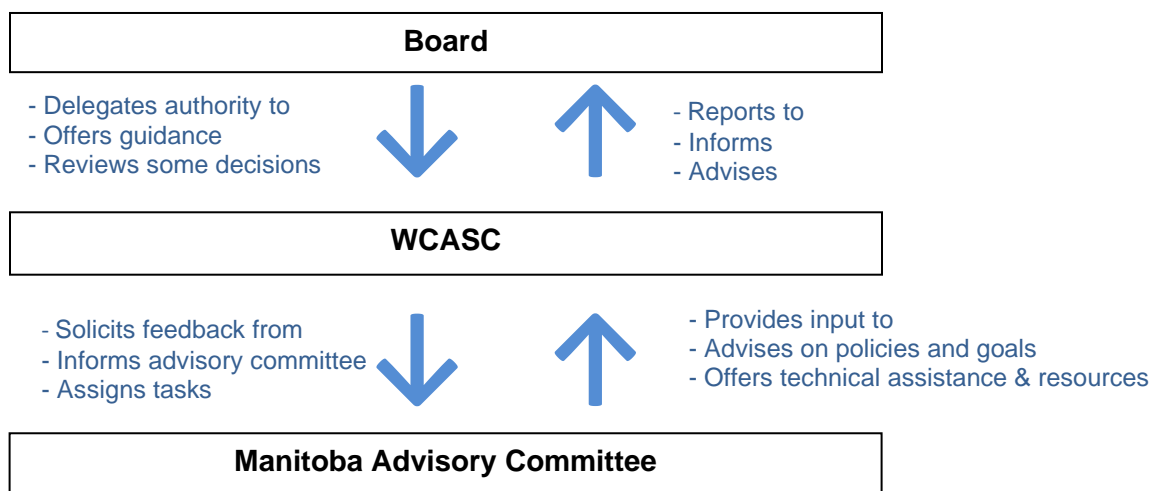
- Due to the small nature of the MAPP, Saskatchewan-based staff will be directly responsible for supporting collection site operations in Manitoba. This arrangement will be re-evaluated yearly.
- Additional support such as communications, administration and finance services are available through Cleanfarms’ national network which includes an Ontario-based head office and regional offices. This allows first sellers to efficiently use the resources that Cleanfarms already has in place.

3.3.5. Governance summary

The following table outlines the key committees that will play a role in the MAPP.

| Committee | Key responsibilities | Membership |
|-----------------------------|---|--|
| Board | - Overall strategic direction - Risk management | Cleanfarms member companies (all business lines) |
| WCASC | - Program oversight - Approval of annual budget, EHF and business plan | First sellers who supply designated materials in Manitoba and Saskatchewan |
| Manitoba Advisory Committee | - Input and advice - Liaises with representative organizations | Key stakeholders in Manitoba |

Relationships between these committees are outlined in the figure that follows:



3.3.6. Additional governance documents

Over its 10-plus years of existence, Cleanfarms has developed a comprehensive and well-documented set of governance and code of conduct policies. The following documents (most are available at <https://cleanfarms.ca/join-cleanfarms/>) outline Cleanfarms’ governance and the expectations of staff, members and contractors:

- By-laws
- Code of Conduct

- Board approved policies – available to members. These are available to outside stakeholders on demand and cover the following: board-management delegation, executive limitations, governance process, operations policies.
- Membership agreement

3.4. Guiding Principles

The following are key factors that guide Cleanfarms' work, both in relation to the MAPP and in all other aspects of the organization.

- The program must be operated in a manner that ensures there is no unacceptable health and safety risk.
- The program must be managed by the manufacturers/brand owners of the products.
- The program must strive to achieve the highest and most practical end use of products while following the 4Rs (reduce, reuse, recycle, recover) hierarchy.
- The program must achieve reasonable, high participation rates. While they may never actually achieve this goal for practical reasons, programs should still strive towards 100 percent recovery.
- The program must provide reasonable accessibility for all users of the products to facilitate and promote their full participation in the program.
- The program must strongly encourage participation by all manufacturers and brand owners.
- The program should be designed in a way that promotes harmonization across different regions or provinces.

4. Designated materials - Description of products targeted by the program

This section outlines and defines which materials will be targeted by the MAPP.

4.1. Ag plastics used in Manitoba

A recent agricultural waste study (summarized in Appendix B) estimated that 1,394 tonnes of ag plastics are used on Manitoba farms. This includes feed bags, twine, grain bags, silage film, bale wrap and to a much lesser extent greenhouse film, sand bags, plastic mulch and seed bags.

Grain bags, twine, silage film and bale wrap are the materials that were targeted and recovered through the pilots (see Section 5.1).

4.2. What's in and What's out

Based on the current availability of recycling markets, current economies of scale and learnings from the pilots, Cleanfarms recommends a structured, phased in approach to incorporating designated materials under the MAPP. See Section 4.2.2 for a further explanation about the phased in approach.

| Phase | Designated Materials (What's in) | Excluded Materials (What's out) | Start date |
|-------|--|---|---------------|
| I | <ul style="list-style-type: none"> • Grain bags aka grain storage bags • Baler twine | <ul style="list-style-type: none"> • Silage film • Bale wrap • Netting | April 1, 2021 |
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4.2.1. Product definitions

For the purpose of this document, the following definitions are used to define the Phase I Designated Materials:

| Designated Material (Phase I) | Definition | Also known as | Exclusions |
|-------------------------------|--|--|--|
| Grain bags | A large, bulky, single-use bag, commonly known as a grain bag, made from plastic and used to protect and temporarily store grains, pulses, and other agricultural produce. Grain bags are usually black & white. | <ul style="list-style-type: none">• Grain storage bags• Grain silo bags | <ul style="list-style-type: none">• Grain seed bags• Grain seed totes |
| Baler twine | Single-use twine made from plastic and used to contain hay and straw | <ul style="list-style-type: none">• Twine | <ul style="list-style-type: none">• Nylon twine• Sisal twine |

4.2.2. Rationale for a phased in approach

As of January 2021, recycling markets for grain bags and baler twine are limited, but they are available. Grain bags are collected through a permanent, industry-funded program in Saskatchewan and through government-funded pilots in Alberta. Baler twine is collected through pilots in both Alberta and Saskatchewan. The collection of grain bags and baler twine across the Prairies is helping to expand recycling markets and create economies of scale. The latter is particularly important for ag plastics management in Manitoba where small volumes (compared to Alberta and Saskatchewan) are generated and therefore activity outside of the province is needed to create economies of scale for efficient program delivery.

Recycling markets for items like silage film and bale wrap are extremely limited and are therefore excluded from Phase I. In fact, Cleanfarms anticipates that some of the material collected over the course of the pilots (Section 5.1) will be sent for waste to energy.

As markets for silage film and bale wrap develop, Cleanfarms will apply to amend this program plan to expand the designated materials included under the MAPP. Phase II is expected to include grain bags, baler twine, silage film and bale wrap.

Netting, also known as net wrap, is excluded from both phases due to technical barriers to recycling this material at this time.

5. Program details

This section details how Cleanfarms will arrange for the collection, transportation, consolidation and processing of designated materials managed through the MAPP. It draws on learnings from the Manitoba-based pilots and best practices from across Western Canada.

5.1. Pilot project (2013 – 2020) summary

37 collection sites (see Appendix C for a listing and map of collection sites) currently accept properly prepared grain bags, baler twine, silage film and bale wrap from farmers.

- Farmers properly prepare materials prior to drop off.
 - Grain bags must be machine-rolled and tied with baler twine.
 - Loose baler twine must be placed in a collection bag with holes poked in the bottom and tied close.

- Silage film and bale wrap must be placed in collection bags or folded and secured with twine.
- Farmers drop off materials at a designated collection site. There is no fee at the drop off point.
- Cleanfarms provides promotion & education materials that explain preparation steps.
- Collection sites temporarily store these materials separately in designated areas. (Cleanfarms provides signage to help designate these separate areas.)
- Approximately two or three times a year, Cleanfarms arranges for the collection of the designated material from collection sites.
 - Some of the material that has been collected through the pilot projects has been sent to North American recycling markets.
 - Some material has been sent to a waste-to-energy facility in Manitoba.
 - Additional material is presently stored at a central consolidation point awaiting shipment to recycling markets.

5.2. MAPP program details

The MAPP will operate in a very similar way as the pilots, however, only grain bags and baler twine will be collected at collection sites.

5.2.1. Establishment of a collection network

The pilots have helped establish a strong collection network throughout the province where farmers who use grain bags and baler twine have reasonable access to a collection site.

Cleanfarms anticipates that the majority of the existing pilot collection sites will continue to offer collection services to local farmers once the MAPP is approved.

Municipal collection sites are generally best suited although private collection sites, such as farm supply dealers or large volume generators (see Section 5.2.1.1), can also be appropriate. Cleanfarms will periodically evaluate and review the collection site network to determine if changes are required based on data like stakeholder inquiries and feedback, collection volumes and usage patterns. A January 2021 review of the collection network suggests that additional collection sites will likely be needed in the Virden or Brandon areas.

5.2.1.1. Special collection sites

In some cases, it may be more efficient for Cleanfarms to arrange for the pickup of designated materials from large volume generators like Assiniboia race track (large users of baler twine) in Winnipeg and farms who use designated materials and are also first sellers. These parties are eligible to become collection sites through the MAPP.

5.2.1.2. Agriculturally intensive areas

It is important to note that the farmers who use grain bags and baler twine are located primarily in agriculturally-intensive areas and therefore collection sites are predominantly located in agriculturally-intensive areas. Special collection events may be best suited to ensure that users that may be located in major cities (e.g. Winnipeg) and if necessary, Northern and remote communities have access to the program.

Currently, the only Northern and remote community that may require access to the MAPP is in the agriculturally-intensive region around The Pas. Cleanfarms will regularly reach out to The Pas municipal staff and businesses that service the farming community in this area to evaluate the need to offer the MAPP in this region and how to efficiently do so.

5.2.2. *Key collection site responsibilities*

Collection sites are primarily responsible for temporarily storing ag plastics to minimize contamination (which maximizes recyclability) and this includes monitoring drop off procedures. Cleanfarms will continue to provide guidance and best practices to collection sites to assist with drop off and temporary storage.

Collection sites are asked to incorporate the following best practices to minimize contamination of ag plastics:

- Use vector control such as bait boxes.
- Temporarily store designated material in a segregated area (about 12 square metres).
- Store designated material separately. In other words, grain bags need to be stored separately from baler twine.
- If possible, make rolling and/or baling equipment available. Collection sites that offer rolling and/or baling equipment may be eligible for additional compensation.
- Restrict access using fencing or other means to minimize contamination, illegal dumping and to maintain site cleanliness.

Collection sites are also asked to do the following to ensure smooth drop off of designated materials:

- Make staff available during collection hours to assist users and ensure that they only drop off properly prepared, designated material:
 - Tightly machine rolled grain bags that are tied with twine.
 - Loose baler twine that is placed in a collection bag with holes poked in the bottom and tied close.
- Use promotion & education materials (supplied by Cleanfarms) as appropriate:
 - Signage (to ensure that grain bags and baler twine are stored properly and separately) should be displayed.
 - Content (or use in websites and newsletters (that helps explain proper preparation steps to producers) should be employed.
- Provide farmers with plastic collection bags (that are used to store baler twine and provided by Cleanfarms).

5.2.2.1. *Collection site compensation*

Similar to Saskatchewan, a funding model where Cleanfarms incentivizes collection sites for annual capital costs plus compensation (\$/kg) based on the volume of material collected will be rolled out.

Based on Cleanfarms' experiences in Saskatchewan (where an incentive program has been in place since 2018) and pilots currently taking place in Manitoba an incentive of \$55/tonne is estimated for the MAPP.

5.2.3. *Key farmer responsibilities (preparation steps)*

Similar to the pilots, farmers will continue to properly prepare materials prior to drop off.

- Grain bags must be machine-rolled and tied with twine.
- Loose baler twine must be placed in a collection bag with holes poked in the bottom and tied close.

Farmers will drop off materials at a designated collection site. There is no fee for dropping off grain bags or baler twine that is prepared properly.

Note: Farmers/producers are not obligated to recycle designated ag plastics under the Regulation.

5.2.4. *Transportation and consolidation*

Two to three times a year, Cleanfarms will arrange for the pickup and transportation of the designated materials from collection sites to a centralized consolidation point where it will be stored and processed if necessary (e.g. baling). Once a sufficient volume of material (17,500 to 20,000 tonnes) is accumulated at the consolidation point, Cleanfarms will send it to a pre-approved recycling facility.

As the volume of material available for pickup increases, the frequency of pickup will likely increase accordingly. Cleanfarms may even be able to ship material directly from a collection site (or collection sites) to pre-approved recycling facilities.

5.2.5. *End of life management of designated materials*

The MAPP will provide a solutions-based approach that relies on sound environmental stewardship principles following the 4Rs hierarchy of Reduce, Reuse, Recycle and Recover.

For both grain bags and baler twine, the primary goal is to recycle material into marketable end-use products rather than other disposal practices like high temperature incineration or energy recovery.

5.2.5.1. *Energy recovery as an alternative*

In the unlikely event of a recycling market shortage, Cleanfarms would consider energy recovery as the next best alternative.

5.3. *Ensuring a smooth transition from the pilots to the MAPP*

A key difference between the pilot phase (Section 5.1) and the MAPP (Section 5.2) is the types of ag plastics that are accepted at a collection site. Under the MAPP, collection sites will accept the designated ag plastics (grain bags and baler twine) while through the pilots, collection sites accepted a wider variety of materials (silage film and bale wrap in addition to designated materials (grain bags and baler twine)).

Cleanfarms will develop a phase-out plan to manage this change. The phase-out plan will likely include the following:

- Once the MAPP is approved, collection sites will be notified that materials accepted through the MAPP have been reduced to grain bags and baler twine only. Collection sites will be provided with communication tools to notify users of this change. Cleanfarms will also ask producer groups to assist with message sharing.
- Cleanfarms anticipates that silage film and bale wrap will continue to be dropped off at collection sites as stakeholders adjust to this change. Cleanfarms will pick up properly prepared silage film and bale wrap from collection sites during a defined phase-out period. We anticipate that the phase-out period will be three to six months after Cleanfarms has been notified of the approval of the MAPP.

6. **Program funding**

This section details how the program is funded.

6.1. *Environmental Handling Fees*

The MAPP will be fully financed through an Environmental Handling Fee (EHF) collected and remitted to Cleanfarms by first sellers of designated ag plastics. Consistent with the requirements of the WRAP Act, the EHF on designated ag plastics will not be collected by the provincial government and will not be considered to be a tax.

Designated ag plastics are sold in various sizes and weights. Thus, the EHF will be determined on a per kilogram basis. The EHF reflects the cost of managing the designated ag plastics.

6.1.1. *EHF start date*

The EHF for the MAPP will come into effect on December 1, 2021.

Most purchasing takes place over the summer months during harvest. This delay (starting the EHF in December when purchasing is low) is deliberate and will ensure for sufficient transition times for first sellers and farmers.

6.2. *Setting the EHF*

The WCASC will approve a yearly budget for the MAPP, which determines the EHF.

6.2.1. *Program costs*

Program costs are currently categorized as follows:

- Operations/direct costs - This typically includes collection bags (for baler twine), baling, transportation costs and incentives paid to collection sites.
- Operations/indirect costs - This captures education and promotion, legal, insurance, travel, meeting and compliance review costs.
- Program management - This captures staffing and shared costs (e.g. website, photocopier, telephone) associated with the MAPP.
- Program development - This often includes administrative costs related to recruiting first sellers and start up duties.
- Program transition – This will continue the collection of designated ag plastics (operations/direct costs) from the time when the pilot ends (March 31, 2021) until the time when Cleanfarms starts receiving revenue from the EHF (December 1, 2021).
- Contingency – This helps manage unknown costs and fluctuations in collection volumes.
- Reserve fund development – These funds are allocated to cover the costs of winding down operations in the event this occurs (typically 50 to 150 per cent of operating costs. For a new program like this, the reserve fund will be built over a five-year period)

6.2.2. *Revenue*

Revenue can be generated from the sale of designated ag plastics. As of November 2020, grain bags generate approximately \$100/tonne in revenue and baler twine generates approximately \$200/tonne. (Revenue from the sale of ag plastics will fluctuate regularly with demand/supply market dynamics.)

Market revenues received will be directed to the MAPP budget and will be incorporated into the EHF calculation.

6.2.3. *Number of units and weight sold into the marketplace*

First sellers will report, in confidence, their sales figures, which include the weight of product and units delivered into the marketplace, to Cleanfarms.

6.2.3.1. *First seller compliance reviews*

A first seller compliance review program will be used to ensure that first sellers are reporting accurately. A similar compliance review program is in place in Saskatchewan.

Some key aspects of the program may include:

- First sellers will typically be selected at random for compliance reviews. However, certain factors such as significant changes in reporting and compliance history may trigger a non-random compliance review.
- First sellers will be notified in writing that they have been selected for a compliance review and advised of the requirements of the process.
- Cleanfarms will use two types of compliance reviews:
 - Level 1 - a desktop audit or review of records and documentation that a first seller has provided to Cleanfarms.
 - Level 2 – In the event that a Level 1 review indicates inaccuracies, a more in-depth review will take place. A Level 2 audit is conducted onsite, at the first seller’s office. It will likely include a review of data and reporting/record-keeping procedures, as well as interviews with staff or management.

In most cases a Level 1 review is sufficient and effective in addressing member reporting and remittance errors or omissions

- Findings will be reported (in confidence) to the first seller and Cleanfarms’ finance staff. Corrective actions, as required, will be undertaken and in extreme cases may involve deregistration from the approved stewardship program, in which case the first seller may be subject to further penalties established and enforced by government regulators.

6.2.4. *Calculating the EHF*

Similar to other stewardship programs, the MAPP program costs will be distributed fairly to all first sellers. The fee will be determined by dividing the total program costs (minus any revenue from the sale of ag plastics) by the total weight of product distributed into the marketplace.

6.2.4.1. *Preliminary EHF estimates*

| EHF (per unit sold into the market) | Grain bags | Baler twine |
|--|-------------------|--------------------|
| EHF (per tonne) | \$250 | \$330 |
| EHF (per kilogram) | \$0.25 | \$0.33 |

Without historic data and only one comparable program in Western Canada, assumptions and projects have been used to calculate a preliminary EHF for the purpose of this document.

| Assumption | Figure | Notes |
|--|---------------|---|
| Total program costs | \$163,000 | |
| Recycling revenue | \$26,000 | |
| Costs covered by EHF | \$137,000 | Total program costs minus recycling revenue |
| Tonnes of grain bags generated or sold | 272 | |
| Tonnes of baler twine generated or sold | 293 | |
| Tonnage recovered (grain bags & baler twine) | 249 | |
| Recovery rate – grain bags | 70% | Approximately 190 tonnes recovered |
| Recovery rate – baler twine | 20% | Approximately 60 tonnes recovered |

6.2.5. Government notification of the EHF

Cleanfarms will notify the appropriate government department (e.g. Manitoba Conservation and Climate) of the EHF on a yearly basis or whenever it changes.

7. Stewards of Designated Ag Plastics/First Seller onboarding process

This section outlines how Cleanfarms will onboard Stewards of Designated Ag Plastics/first sellers, or companies that are obligated under MAPP. The onboarding strategy employed for the MAPP (and outlined below) is based on techniques used in other provinces and for other programs. It may need to be adjusted for the MAPP and will likely involve the following steps:

- Company Identification - Cleanfarms uses a variety of tools to identify (potential) first sellers. This includes desktop research, outreach at farm shows and member referrals. Once Cleanfarms identifies a company as a potential first seller, the first seller is contacted in person, by phone or by email to better determine that the company meets the definition of a first seller.

Cleanfarms attempts to identify a key individual within the company who is responsible for regulatory compliance or end of life stewardship. (In some cases, after learning more about a company, it may not meet the definition of a first seller. Records and interactions are documented in the event that the company's product line or circumstances change.)

- Education and awareness - Cleanfarms emails the first seller informing them of the benefits of Cleanfarms' programs and their obligations. A meeting by phone or in-person is requested. Repeated attempts by phone or email are made to set up a meeting. These interactions are documented.

Cleanfarms will engage with the first seller at least four times over 25 business days before the first seller is internally identified as 'non-responsive'.

Please note: Cleanfarms has found that direct outreach outlining regulatory obligations from government officials to first sellers (e.g. in the form of a letter) is very effective. Upon approval of the MAPP, Cleanfarms will ask Manitoba Conservation & Climate to send a letter to first sellers advising first sellers of their regulatory obligations and options.

- First seller meeting - Cleanfarms and the first seller meet to review program benefits, pricing, key policies and registration procedures. The first seller is asked to register or sign up for membership.

Following the first seller meeting, Cleanfarms will engage with the steward at least four times over 25 business days before the steward is classified as 'non-compliant'. These interactions are documented.

- Outreach to non-responsive and non-compliant first sellers - A registered letter is sent to 'non-responsive' or 'non-compliant' first sellers. The content in the letter varies depending on the individual circumstances and usually addresses a first seller's regulatory obligation and how this can be met.
- Ministerial engagement - In the event that first sellers are not responsive, Cleanfarms will engage with the appropriate ministry (e.g. Manitoba Conservation and Climate) for further assistance. Cleanfarms can provide ministry officials with documentation of interactions and first seller contact information upon request.

8. Promotion & Education

Cleanfarms has a comprehensive and well-developed education and awareness approach that has been specifically developed to meet the needs of farmers/producers and other stakeholders involved in the agricultural sector. This approach is in use to support Cleanfarms' existing program and will be used to support the MAPP.

Upon the launch of the MAPP, promotion and education will primarily focus on educating farmers/producers about the Environmental Handling Fee. Similar to what was undertaken in Saskatchewan when the grain bag recycling program was launched, Cleanfarms may use a targeted paid media campaign and also work closely with first sellers to help educate their customers (farmers/producers).

Promotion and education will also focus on educating the following key stakeholders about the key aspects of the program:

- first sellers - regarding their obligations surrounding the MAPP
- collection sites – regarding changes needed to transition the program from the pilot phase to a permanent, regulated program (MAPP)
- users (farmers/producers) - regarding EHF awareness, which ag plastics are designated and which ag plastics are not (What's In vs. What's Out), how to participate in the program

As the program matures, education and awareness efforts will likely shift towards the benefits of program participation and actions required by users and collection sites to ensure recyclability of the material.

Sample tools that were used to launch Saskatchewan's grain bag recycling program as well as tools used in the pilot are included in Appendix D.

9. Performance measures

The primary way that Cleanfarms measures the success of its programs is through its return rate, which compares the volume of the designated material sold into the marketplace with the volume collected.

Additional performance measures that may be considered include:

- Contamination rates
- Public awareness
- Program efficiency
- Number of collection points (access)
- User exit surveys to assess user satisfaction
- Collection site surveys to assess collection site experience and satisfaction
- Volumes collected by site or region

Performance measures will be reported through the Annual Report to government. The fiscal year of the MAPP is the calendar year.

10. Dispute Resolution

All Cleanfarms members must abide by a very explicit Code of Conduct. The Code of Conduct comprises a number of important policies that include a code of business ethics, lobbying, privacy, complaints from public and a dispute resolution process.

Cleanfarms' Dispute Resolution policy is broken down into two parts ('Complaints from the public regarding Members' and 'Complaints or disputes among Member') and is available online at www.cleanfarms.ca. Please see Appendix G for the full policy.

11. Consultation

11.1. *Public consultation on the MAPP (pre-approval)*

A grower survey was undertaken in winter 2019 to capture farmer attitudes and behaviours, including their reaction to the pilots and a potential permanent program. A summary of these results is available in Appendix E.

Cleanfarms sought input from key stakeholders at various trade shows and meetings throughout 2018 and 2019. Direct and ongoing consultation and communication with Manitoba farmers/producers and municipal collection site operators has also taken place throughout the duration of pilot program.

A consultation process on the MAPP commenced in the fall of 2020 where Cleanfarms sought input from key stakeholders through a formal PSP consultation process. The purpose of the consultation was to invite stakeholders to:

- Provide advice about their needs, wants and expectations; and
- Comment on plans that have been outlined in the Stewardship Program Plan.

A consultation report, Appendix H, summarizes the consultation process.

11.2. *Ongoing consultation on the MAPP (post-approval)*

Collection site surveys, trade show attendance, meetings with grower groups, and one-on-one meetings with first sellers are the primary ways that Cleanfarms will ensure ongoing consultation with key stakeholders. The Manitoba Advisory Committee will also be key to ensuring ongoing consultation and continuous improvement.

Appendix A – WCASC Terms of Reference (draft)

Members & roles

- **Members: First Sellers of Designated Ag Plastics**
Members are responsible for attending meetings, providing input to the program and completing member responsibilities (sales surveys, paying invoices). When serving on the WCASC, members must make decisions based on the best interest of the program and Cleanfarms.
- **Chair: Selected by the Members**
The Chair is responsible for calling meetings, setting or approving meeting agendas and liaising with the Board. Members will select a Chair.

Goal

Deliver an efficient and effective government-approved grain bag recycling program that:

- provides value to First Sellers,
- demonstrates a long-term commitment to good environmental stewardship,
- supports Cleanfarms' mission and vision, and
- meets the requirements outlined in The Agricultural Packaging Product Waste Stewardship Regulations and the Packaging and Printed Stewardship Paper Regulation 195/2008.

Deliverables

- Product Stewardship Plan & self-funded program
- Annual budget & business plan
- Periodic reports to the Cleanfarms Board (usually in conjunction with Board meetings)
- Annual report to Saskatchewan's Ministry of Environment and Manitoba Conservation & Climate.

Scope

The WCASC shall:

- assist with identifying First Sellers and other key stakeholders,
- review, evaluate and approve an annual business plan and budget that is drafted by staff,
- review, evaluate, and provide information and recommendations to the Board where the Board is making decisions in areas that are related to the WCASC's responsibilities, and
- annually review its terms of reference and recommend any required changes.

Budget & resources

- Annual budget as approved by the WCASC.
- Cleanfarms staff will provide administration and management support to the WCASC and associated programs.

Governance

- The WCASC will aim to achieve consensus in all decisions. In the event that a consensus cannot be reached, all questions/decisions shall be decided by a majority of votes. In the case of an equality of votes, the Chair, in addition to their original vote, may cast a second vote. Each Member (or company) is entitled to one vote.
- WCASC Members can select a proxy to attend a meeting in the event that a Member is unable to attend. The Member will inform the Chair of the substitution at least five business days prior to the meeting. The proxy will have all the same responsibilities and roles, including voting rights, as the Member.
- The WCASC has the responsibility and authority to make decisions directly related to The Program without Board ratification. However, any decisions or recommendations that may have an impact on other Cleanfarms programs or the organization's overall reputation must be ratified by the Board. Staff will use their discretion to identify these decisions or recommendations.

Additional notes

- Members must adhere to the By-Laws and Code of Conduct.
- Regular meetings will be established, likely on a bi-yearly basis or as determined by the WCASC.
 - Depending on the WCASC's preferences, most meetings will take place by teleconference.
 - Members will forward agenda items to the Chair or Council Coordinator at least 10 business days prior to meetings.
 - Meeting agendas & materials will be provided to the council at least five business days prior to meetings.

Appendix B – Agricultural waste study summary

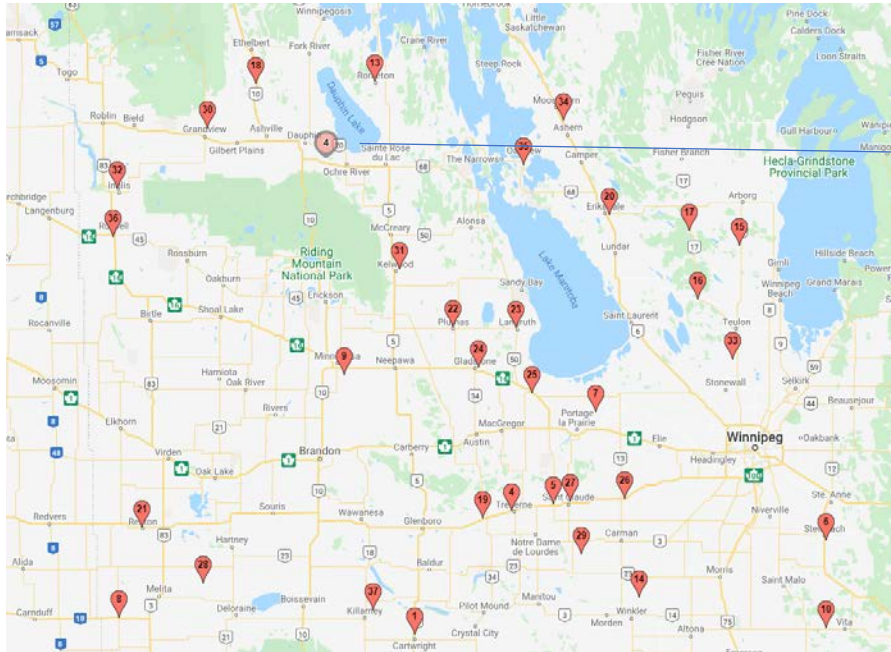
A recent agricultural waste study commissioned by Cleanfarms estimates that 1,394 tonnes of ag plastics are used on Manitoba farms:

| Category | Sub category | Tonnes/year |
|---------------------------|-----------------|----------------|
| Plastic | | |
| LDPE | Grain bags | 272.2 |
| | Silage film | 144.6 |
| | Bale wrap | 129.6 |
| | Greenhouse film | 15.3 |
| | Sand bags | 7.6 |
| | Plastic mulch | 0.4 |
| Subtotal - LDPE | | 569.7 |
| | | |
| PP | Feed bags | 383.6 |
| | Twine | 293.4 |
| | Seed bags | 43.0 |
| Subtotal - PP | | 720 |
| | | |
| HDPE or PP | Netwrap | 103.9 |
| Subtotal –PP or HDPE | | 103.9 |
| Subtotal - plastic | | 1,393.6 |
| | | |
| Paper | | |
| Cardboard | | 2,586.7 |
| Boxboard | | 966.4 |
| Laminates | | 338 |
| Seed bags (paper) | | 139.1 |
| Feed bags (paper) | | 179.8 |
| Subtotal - paper | | 4,210 |
| | | |
| Total | | 5,603.6 |

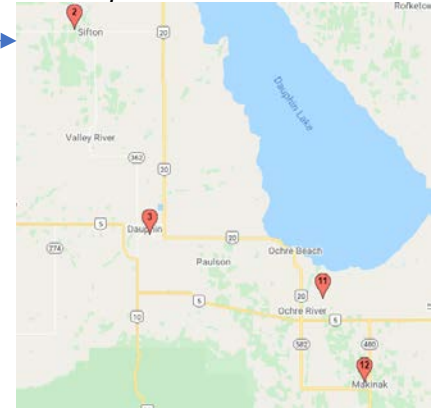
The full agricultural waste study is available at www.cleanfarms.ca.

Appendix C – Pilot Summary

Pilot collection site map



Close up of four collection sites in the Dauphin area:



Pilot collection site listing

| | | | |
|----|---|----|--|
| 1 | RM of Cartwright-Roblin Waste Transfer Station | 20 | RM of Coldwell Eriksdale - Waste Disposal Grounds |
| 2 | RM of Dauphin, Sifton Landfill | 21 | RM of Pipestone - Reston Landfill & Recycling Depot |
| 3 | RM of Dauphin, Sammy's Farm Supply | 22 | RM of Westlake-Gladstone - Plumas Location |
| 4 | RM of Norfolk-Treherne, Treherne Transfer Station | 23 | RM of Westlake-Gladstone - Langruth Location |
| 5 | RM of Norfolk-Treherne, Rathwell Transfer Station | 24 | RM of Westlake-Gladstone - Gladstone Location |
| 6 | City of Steinbach, City of Steinbach Landfill Facility | 25 | RM of Westlake-Gladstone - Westbourne Location |
| 7 | RM of Portage la Prairie, The Portage la Prairie Landfill | 26 | RM of Grey Landfill |
| 8 | RM of Two Borders, Pierson Landfill | 27 | RM of Grey - R-Way AG Ltd. |
| 9 | Neepawa Area, Evergreen Technologies Regional Landfill | 28 | RM of Brenda-Waskada |
| 10 | RM of Stuartburn | 29 | RM of Thompson |
| 11 | RM of Lakeshore, Ochre River Landfill | 30 | Grandview Municipality Waste Transfer Station |
| 12 | RM of Lakeshore, Makinak Landfill | 31 | RM of Rosedale - Kelwood Landfill |
| 13 | RM of Lakeshore, Rorketon Landfill | 32 | RM of Riding Mountain West - Inglis Waste Disposal |
| 14 | RM of Stanley SWAMP Landfill | 33 | RM of Rockwood - Balmoral Landfill |
| 15 | RM of Armstrong - Meleb Waste Disposal Grounds | 34 | RM of Westinterlake - Ashern |
| 16 | RM of Armstrong - Inwood Transfer Station | 35 | RM of Westinterlake - Oakview Waste Transfer Station |
| 17 | RM of Armstrong - Chatfield Transfer Station | 36 | RM of Russell/Binscarth |
| 18 | RM of Ethelbert - Mink Creek Waste Transfer Station | 37 | Municipality of Killarney-Turtle Mountain |
| 19 | RM of Victoria - Holland Waste Disposal Grounds | | |

Key metrics from the pilots:

| Phase | Year | Sites | Volume collected (kg) | Cost per kg | Funding | Actual pilot cost | Key findings |
|-------|------|-------|-----------------------|-------------|-----------|-------------------|---|
| I | 2013 | 3 | 4,400 | \$5.83 | \$25,000 | \$25,653 | - Micro-pilots demonstrated interest from producers and municipalities. |
| | 2014 | | | | | | |
| II | 2015 | 7 | 11,000 | \$4.30 | \$50,000 | \$47,255 | - Regional landfills are ideal partners. - Additional work is required to minimize contamination. - Blitz style collections are not ideal due to human resource restrictions. |
| III | 2016 | 7 | 19,700 | \$1.44 | \$90,000 | \$88,909 | - Truckload volumes were generated. - Contractor availability is limited. - Contamination is challenging. - Increasing collection volumes demonstrate interest from farmers/producers. |
| | 2017 | 16 | 41,900 | | | | |
| IV | 2018 | 23 | 23,010 | \$1.49 | \$75,500 | \$86,297 | - Finding recycling markets for certain plastics is challenging due to contamination and global market downturn. - Ongoing interest from farmers/producers continues. |
| | 2019 | 32 | 34,860* | | | | |
| V | 2020 | 37 | 40,428 | tbd | \$184,604 | | -Tbd - Contractor availability has improved and allows for more frequent servicing of collection sites. |
| | 2021 | tbd | tbd | tbd | | | |

* Several Northern collection sites were not serviced in spring 2019 due to road bans.

Materials collected through the pilots:

| What's in? | What's out? |
|---|--|
| <p>Clean, dry & separated:</p> <ul style="list-style-type: none"> • Twine • Silage film • Bale wrap • Rolled grain bags <p><i>*Only large pieces of silage that are folded and secured with twine are accepted.</i></p> | <ul style="list-style-type: none"> • Net wrap or netting • Fiber (sisal) twine • Nylon rope • Feed bags or seed bags |

Appendix D – Sample promotion & education materials

Advertisement

**Important
Information for
Saskatchewan
Farmers**

**Grain Bag Recycling Fee
Started November 1, 2018**

The non-refundable Environmental Handling Fee is part of a government-regulated program to fund the recycling of grain bags used in Saskatchewan. The fee, which started Nov 1/18, is applied when farmers purchase or import bags.



phone: 877-622-4460
grainbagrecycling.ca

Saskatchewan's grain bag recycling program operated by Cleanfarms

Planning to use grain bags in 2019?

Recycle them.

Keep used & empty grain bags out of the environment.

A provincially-regulated recycling program is now in place.

This program is funded through a non-refundable Environmental Handling Fee (EHF) of about 25 cents per kilogram applied to all grain bags at the time of sale.

grainbagrecycling.ca




Saskatchewan's grain bag recycling program is operated by Cleanfarms

@Cleanfarms

Instructional materials:

Saskatchewan Twine Recycling Pilot Project



Twine


Please contact your local Cleanfarms pilot collection site to confirm that they collect twine, their hours of operation and if assistance is available. Find local sites at Cleanfarms.ca in "What to Recycle & Where".


3 steps to ensure your used twine can be accepted and recycled:

- 1 Shake**
 - Remove as much debris, snow or ice as possible*
 - Do not include net wrap
- 2 Bag**
 - Obtain Cleanfarms recycling bag from your collection site
 - Place loose twine in a Cleanfarms recycling bag
 - Poke small holes in bag at the bottom to drain water
 - Secure bag tightly with twine or zip tie
- 3 Return**
 - Return to your local Saskatchewan twine recycling pilot collection site.

*Excessively dirty twine may be rejected or subject to landfill tipping fees.

For more information: 1-877-622-4460 cleanfarms.ca

 Agriculture and Agri-Food Canada Agriculture et Agroalimentaire Canada



Saskatchewan Grain Bag Recycling



Grain bags

Please contact your local Saskatchewan Grain Bag recycling collection site prior to drop off. Find local sites at Cleanfarms.ca in "What to Recycle & Where".

3 steps to ensure your used grain bags can be accepted and recycled:

- 1 Shake**
 - Please shake off as much organic material (spillage, dirt, etc.) as possible*
- 2 Roll**
 - Must be rolled and tied with twine
 - Grain bag rollers are available at various collection sites
- 3 Return**
 - Contact your local collection site in advance to confirm hours of operation and if assistance is available.

*Excessively dirty, loose or unsecured bags may be rejected, subject to a landfill tipping fee or additional charges at dropoff.

For more information: 1-877-622-4460 cleanfarms.ca



Signage:




Website:

1.877.622.4460 COVID-19: 2020 CLEANFARMS COLLECTION UPDATES | Collection Site Login | Board Login | Member Sales Survey | Contractors | Francpals (agfrecup.ca)

cleanfarms 10 YEARS

What to Recycle & Where Programs by Province Research, Pilot Projects & Consultation Resources Partners News & Blog About Q


Twine, bale wrap & silage film



Twine

Alberta


Twine is accepted.



Twine, bale wrap & silage film

Manitoba

Twine, bale wrap and silage film are accepted.



Find a Collection Site

Alberta

Follow these 3 steps to ensure that your used twine can be accepted and recycled:

1. Shake - Remove as much debris, snow or ice as possible. *Excessively dirty twine may be rejected, or subject to a landfill tipping fee or additional charges at drop off.*
2. Bag - Place loose twine in a clear collection bag, poke holes in the bottom to drain moisture, and secure bag closed with twine or a zip tie. Please do not knot the twine. Twine collection bags made from 90% PCR content with perforated holes in the bottom are available at no cost to producers and can be obtained from pilot collection sites and select County/MD offices. Contact your County/MD office for availability.
3. Return - Please contact your local [pilot collection site](#) prior to dropping off material if unloading assistance is required and if you are unsure if you have prepared it properly.

In Alberta, many sites accept both grain bags and twine, under the Alberta Ag-Plastic, 'Recycle It!' program. (Note: these materials must be stored and prepared separately.) View the [Grain Bag recycling](#) page for details and collection site map.

Manitoba

Follow these 3 steps to ensure that your used twine can be accepted and recycled:

1. Shake - Remove as much debris as possible.
2. Bag - Ag film and twine should be rolled up to place in recycling bag. Use Cleanfarms recycling bags available at your RM office or collection site to collect your bale/silage wrap and twine; tie bags to close.
3. Return - Return to your local [collection site](#).

What's In & What's Out in Manitoba

| WHAT'S IN | WHAT'S OUT |
|---|--|
| Clean, dry & separated: <ul style="list-style-type: none"> • Twine • Bale/silage wrap* • Rolled grain bags | <ul style="list-style-type: none"> • Unrolled grain bags • Loose twine • Nylon twine/netting • Feed bags and seed bags |

Appendix E – 2019 Manitoba Farmer Survey Summary

This document provides a high-level summary of a survey conducted in the winter of 2019 with 355 Manitoba crop and livestock farmers regarding disposal practices of agricultural plastics as they relate to a recycling pilot project. Contact [us](#) for the full results.

Key takeaways:

- The following plastics are most commonly used on Manitoba farms: pesticide/fertilizer containers, plastic wrap on cases/pallets, seed/pesticide bags, twine and net wrap.
- The top three disposal methods reported for the following items:

| Grain bags | Twine | Containers (<i>benchmarking</i>) |
|------------------|------------------------------|------------------------------------|
| - Landfill (26%) | - Burn (65%) | - Return for recycling (76%) |
| - Burn (23%) | - Landfill (19%) | - Return to a retailer (22%) |
| - Re-use (23%) | - Return for recycling (12%) | - Burn (7%) |
- When it comes to satisfaction with their disposal method, a higher proportion of those respondents who return their plastic waste to collection depots (or suppliers) are satisfied relative to those who take items to the landfill or burn them.
- Plastic silage / bale wrap, net wrap and grain bag users produced the highest portion of “not very satisfied” and “not at all satisfied” respondents with 43% - 47% reporting this.
- About 24% of respondents who use twine, bale/silage wrap or grain bags were aware of the pilot projects and a small portion have used the pilots. Usage/participation correlates with awareness of depot locations.
- 77% of twine, grain bag and/or bale wrap users are very or somewhat likely to participate in the pilot if a site is in their area.
- 82% of twine/grain bag and/or bale wrap users are supportive (49% very supportive + 33% somewhat supportive) of making a province-wide recycling program for these items in Manitoba.
- 37% of all respondents indicated that they would like to see a new recycling program for managing additional waste products. When focusing only on users of specific types of ag plastics, the highest level of requests for programs is seen for bale/silage wrap (67%), grain bags (57%) and twine (32%) users.
- 99% of producers strongly or somewhat agree that responsible disposal of ag waste is very important.
- Concerns related to the financial implications of a permanent, industry-funded recycling program were raised.
 - 75% of producers strongly or somewhat agree that they don't like any additional fees but understand the need to support a recycling program.
 - 53% of producers strongly or somewhat agree that they are okay with paying an environmental handling fee, if the program is easy to use and accessible.
 - 58% of producers are strongly or somewhat opposed to paying an environment handling fee.

Appendix F – Letter from the Manitoba Government (May 2018)

RECEIVED
JUN 05 2018



Environmental Stewardship
Sustainable and Green Initiatives
Box 38, 200 Saulteaux Crescent
Winnipeg, Manitoba, Canada R3J 3W3
T 204-945-0331 F 204-945-4552

May 29, 2018

Mr. Barry Friesen
General Manager
CleanFARMS Inc.
10 Four Seasons Place, Suite 400
Etobicoke ON M9B 6H7

Dear Mr. Friesen:

I am writing to you today to share Manitoba's plan to manage end-of-life agricultural film and twine in a manner that is safe for the environment and human health.

Agricultural plastic waste materials are a major environmental concern facing the agricultural industry in Manitoba. Farmers in Manitoba generate an estimated 1,000 tonnes of plastic waste every year. This includes grain bags, bale and silage wrap, and twine. Around 60%-70% of this waste is burned onsite and the rest is sent to landfills. Less than 2% of this waste is presently collected and recycled through the existing pilot program for agricultural plastics that is funded by the province and implemented by CleanFARMS.

Though agricultural plastics are designated under the Packaging and Printed Paper Regulation, Manitoba does not have an industry-funded program for recycling agricultural plastics. However, the province has been supporting a pilot program since 2013 in preparation for launching a regulated program. Over the years, this program has grown significantly by increasing the number of collection sites, the amount of plastics collected, the level of program awareness among farming communities and the number of partnerships with rural municipalities. In 2017, this program helped to collect over 20,000 kilograms of agricultural plastics from 16 rural collection sites.

Manitoba has also been in discussion with other Prairie Provinces regarding harmonizing agricultural plastics recycling across the region. We are very encouraged by Saskatchewan's decision to launch an extended producer responsibility program for agricultural grain bags in 2018, which will also be managed by CleanFARMS. Such new developments and evolution of the Manitoba pilot program over the years have led the department to review the situation and decide to formally initiate the process of transition towards a fully regulated program for agricultural plastics beginning in 2020.

Transitioning into an industry-funded program will help establish a long-term sustainable solution for recycling agricultural plastics in Manitoba. It will also help create a level playing field across the prairies. Given that CleanFARMS has been involved in both Manitoba and Saskatchewan in designing and/or managing programs for agricultural plastics, we would appreciate CleanFARMS' help with conducting stakeholder consultations and initiating other preparatory measures to ensure a smooth transition.

In particular, we would request CleanFARMS to reach out to the stewards of agricultural plastics in the coming weeks and share with them Manitoba's long term plan regarding recycling of agricultural plastics. Our intention is to alert you and the potential stewards about these upcoming changes and provide sufficient lead-time to comply with the Packaging and Printed Paper Regulation as it applies to agricultural plastics.

This is an exciting time for Manitoba as we look to modernize the existing stewardship programs and add new products under the umbrella of extended producer responsibility programs. Manitoba will continue to strive towards achieving a more ambitious waste diversion goal, which will also help achieve its greenhouse gas emission reduction targets as noted in the Made-in-Manitoba Climate and Green Plan.

I look forward to the continued cooperation and support from CleanFARMS and industry stewards in providing a sustainable solution for recycling agricultural plastics in Manitoba.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'RKlos', is positioned above the printed name and title.

Ryan Klos
Director

c: Honourable Rochelle Squires
Rob Olson
Tracey Braun
Glen Holmes

Appendix G – Dispute Resolution

The following is an excerpt from Cleanfarms' Code of Conduct and outlines the organization's Dispute Resolution process. is Section 7 of Cleanfarms' Code of Conduct (available at www.cleanfarms.ca)

SECTION 7: DISPUTE RESOLUTION

7.1 Complaints from the public regarding Members

7.1.1 Complaints made to Cleanfarms by a member of the public concerning the conduct of a Member must be addressed in writing to the official representative of the company and the General Manager of Cleanfarms. On receipt of such a complaint, the General Manager will refer the matter to the Member involved for resolution of the issue.

7.1.2 Members hereby agree to indemnify and hold Cleanfarms harmless from any from and against all costs, charges and expenses, including all amounts paid to settle any action or satisfy any judgment reasonably incurred by or on behalf of Cleanfarms in respect of any civil, criminal or administrative action, private arbitration, or other proceeding, to which Cleanfarms is or may become a party (or any such proceeding which might be threatened and in respect of which Cleanfarms is threatened to be made a party) by reason of any negligence or wilful misconduct of the Member or by reason of a failure by the Member or any of its representatives to conduct itself in accordance with this Code of Conduct or with any requirements prescribed by Cleanfarms with respect to its stewardship programs.

7.2 Complaints or disputes among Member

7.2.1 Members consent and agree that disputes or controversies among Members, Directors, Officers, committee members, or volunteers of Cleanfarms concerning matters relating to Cleanfarms' articles, by-laws, Code of Conduct, approved corporate policies or operations ("Eligible Disputes") are to be resolved in accordance with mediation and/or arbitration as provided in Section 7.2.2.

7.2.2 Dispute Resolution Mechanism

In the event that an Eligible Dispute is not resolved in private meetings between the affected parties within 30 days of the written notice of an Eligible Dispute delivered by one of the parties to Cleanfarms and the other affected parties, then such Eligible Dispute shall be settled by a process of dispute resolution as follows:

7.2.2.1 The dispute or controversy shall first be submitted to a panel of mediators whereby the one party appoints one mediator, the other party (or if applicable the board of the organization) appoints one mediator, and the two mediators so appointed jointly appoint a third mediator. The three mediators will then meet with the parties in question in an attempt to mediate a resolution between the parties.

7.2.2.2 The number of mediators may be reduced from three to one or two upon agreement of the parties.

7.2.2.3 If the parties are not successful in resolving the dispute through mediation, then the parties agree that the dispute shall be settled by arbitration before a single arbitrator, who shall not be any one of the mediators referred to above, in accordance with the provincial or territorial legislation governing domestic arbitrations in force in the province or territory where the registered office of Cleanfarms is situated or as otherwise agreed upon by the parties to the dispute. The parties agree that all proceedings relating to arbitration shall be kept confidential and there shall be no disclosure of any kind. The decision of the arbitrator shall be final and binding and shall not be subject to appeal on a question of fact, law or mixed fact and law.

7.2.2.4 All costs of the mediators appointed in accordance with this section shall be borne equally by the parties to the dispute or the controversy. All costs of the arbitrators appointed in accordance with this section shall be borne by such parties as may be determined by the arbitrators.

Appendix H – Consultation Report

1. Introduction

Since 2013, Cleanfarms has operated a government-funded ag plastic collection program in Manitoba and collected 135,000 kilograms of material.

Starting in late 2018 and at the request of the Manitoba government, Cleanfarms began the process of helping the province evaluate transitioning the government-funded agricultural plastics (ag plastics) pilot projects into a permanent, industry-funded stewardship program which is referred to as the 'Manitoba Ag Plastics Plan' (MAPP).

During the fall of 2020, Cleanfarms began targeted outreach to key stakeholder groups to solicit preliminary feedback into the development of the MAPP. On November 30, 2020, Version 01 of MAPP was submitted to Manitoba Conservation and Climate and made available on Cleanfarms' website for comment.

This consultation report summarizes the process and feedback Cleanfarms received from the fall of 2020 (just prior to the release of Version 01 of the MAPP) to January 2021. It also includes some references to relevant activity undertaken earlier.

2. Affected stakeholders

The materials targeted by the MAPP are a distinct group of products that are used primarily by farmers/producers. The general public does not typically purchase or use grain bags, baler twine or other ag plastics. Accordingly, Cleanfarms' consultation efforts focused primarily on the following stakeholders:

1. Farmers/producers – stakeholders who use the designated ag plastics
2. First sellers/stewards – manufacturers, distributors and retailers of designated ag plastics
3. Collection sites or potential collection sites - municipal and regional waste management system administrators and operators
4. Relevant provincial government agencies

2.1. Key stakeholder groups

The following groups were identified as high priority, key stakeholders where one-on-one outreach was needed:

- Manitoba Canola Growers Association
- Manitoba Beef Producers
- Dairy Farmers of Manitoba
- Manitoba Forage & Grassland Association
- Keystone Agricultural Producers
- Manitoba Agriculture and Resource Development
- Manitoba Conservation & Climate

3. Consultation process

3.1. Ongoing dialogue and information sharing

- Ongoing dialogue has taken place with collection sites and farmers/producers through all phases of the Manitoba pilot program (since 2013).
- Many of the impacted grain bag first sellers are already Cleanfarms members and have been kept up to date on the development of the MAPP.
- Cleanfarms has a dedicated webpage which outlines the consultation process and summarizes key recommendations made through the MAPP.

3.2. 2018 – 2019: outreach via meetings and tradeshow participation

Cleanfarms attended various events to get preliminary feedback from targeted stakeholders during late 2018 and early 2019.

- To connect with municipal and regional waste management stakeholders, Cleanfarms hosted a booth at the Manitoba Association of Regional Recyclers' (MARR's) annual Manitoba Recycling & Waste Reduction Forum (November 2018 and 2019) and the Association of Manitoba Municipalities' (AMM's) Annual Convention (November 2018).
 - Cleanfarms also presented to the Manitoba Association of Regional Recyclers' (November 2018) to raise awareness of the pilots and share plans to transition the pilots to a permanent program.
- To hear from producers, Cleanfarms hosted a booth at the Manitoba Forage & Grassland Association's Annual Meeting (November 2018 & November 2019) and the Manitoba Beef Producer's Annual Meeting (February 2019).
- A formal Manitoba Ag Plastics Consultation Kick-Off Meeting was held in December 2018 where key stakeholders were provided with an update on the pilots and the process to transition them to a permanent program. The following groups were in attendance:
 - Manitoba Canola Growers Association
 - Manitoba Beef Producers
 - Dairy Farmers of Manitoba
 - Manitoba Forage & Grassland Association
 - Keystone Agricultural Producers
 - Manitoba Agriculture and Resource Development
 - Manitoba Sustainable Development
- Cleanfarms presented to Keystone Agricultural Producer's Environment Committee (December 2019) and provided an update on the pilots and transitional process.

3.3. 2020: feedback and input gathering on key elements of the MAPP

- In August 2020, Cleanfarms hosted a webinar with pilot collection sites to provide best practices for the collection of materials and proposed changes to the materials accepted through the permanent program. The following collection sites were in attendance:
 - City of Steinbach
 - Evergreen Environmental Technologies Corporation
 - Municipality of Brenda Waskada
 - RM of Grey
 - RM of Lakeshore
 - RM of Rosedale
 - RM of Stuartburn
 - RM of Victoria
 - RM of West Interlake
- In September 2020, Cleanfarms advised Manitoba Conservation and Climate of the process and timelines that would be used to re-engage key stakeholders in final discussions leading towards the submission of a program plan for Ministerial review and approval.
- In October 2020, key stakeholder groups were re-engaged in a second round of (virtual) consultations. Preliminary information about key elements of the MAPP and important deadlines were shared. One-on-one meetings with the following groups were held:
 - Manitoba Canola Growers Association
 - Manitoba Beef Producers
 - Dairy Farmers of Manitoba
 - Manitoba Forage & Grassland Association
 - Keystone Agricultural Producers
 - Manitoba Agriculture and Resource Development
 - Association of Manitoba Municipalities

Many of these stakeholder groups assisted Cleanfarms by distributing information to their members through their newsletters and other communication channels. Appendix A outlines how information was shared via some of these stakeholder groups.

- Cleanfarms presented to Keystone Agricultural Producer’s Environment Committee (November 17, 2020) and Manitoba Beef Producer’s Environment Committee (November 20, 2020). Producers were provided with an overview of the key elements of the plan.

3.4. *Consultation on the MAPP (version 01)*

- On November 30, 2020, version 01 of the MAPP was submitted to Manitoba Conservation and Climate and made available on Cleanfarms’ website.
 - The key stakeholders listed above were notified by email that the full plan was available for comment.
 - See Appendix B for letters received in response to Version 01 of the MAPP as well as additional written feedback received from stakeholders.
- On December 10, 2020, Cleanfarms presented at the Manitoba Association of Regional Recyclers’ (MARR’s) annual Manitoba Recycling & Waste Reduction Forum with an overview of key elements of the MAPP.
- On December 16, 2020, Cleanfarms issued a press release soliciting feedback on the MAPP.
 - The news release, which included a link to the Version 01 of MAPP was distributed to a variety of stakeholders (Appendix C).
 - The press release is found in Appendix D along with media coverage.

Appendix E captures some of the tools used throughout the consultation process.

4. Stakeholder feedback

4.1. Producer feedback summary

Overall, feedback from producers indicated support for recycling ag plastics and made note of its alignment with broader sector goals to continuously improve the sustainability of Manitoba’s agricultural sector. Producers also noted that recycling initiatives such as the MAPP are an additional cost burden for producers, with some sectors unable to pass these additional costs on.

Additional feedback reflects the following:

- While producers support the rationale for the phased in approach that was suggested in the MAPP, there is a strong desire to expand the list of designated ag plastics accepted.
- Readily accessible collection sites are key to encouraging participation from producers. Efforts should be made to increase the number of collection sites to ensure accessibility.
- Producers are looking for financial transparency including assurances that the revenue generated through the EHF is used exclusively for the MAPP and clarity about the review process for establishing and re-evaluating the EHF.
- Producers are seeking interim guidance on how to manage Phase II materials that were collected as part of the pilots and not included in Phase I of the MAPP.
- Some producers mentioned that minimizing contamination may be a challenge.

4.2. Collection site feedback summary

Overall, municipalities and collection sites are supportive of moving forward with an industry-funded program. Feedback also reflects the following:

- There is concern that the removal of silage film and bale wrap (identified as Phase II materials) from the MAPP will pose challenges to collection sites because some producers are accustomed to bringing these materials to collection sites.

- Some collection sites have mentioned that the requirement that ag plastics be separated on the farm is an inconvenience for farmers and may deter participation.

4.3. First seller feedback

Very little first seller feedback was received. Overall, conversations with first sellers have suggested support for recycling initiatives and the need for information sharing about key elements related to their responsibilities (reporting and remitting and other administrative rules). At the same time, stewards express concerns about the impact that an added fee (in the form of the EHF) might have on one's business.

4.4. Additional feedback and observations

- It was noted that there may be some confusion with terminology used by stakeholders. For some, the term 'grain bag' may be interpreted as a bag used to store seed or grains that are delivered to consumers.
- Throughout the consultation process, Cleanfarms received questions from a variety of stakeholders about potentially providing incentives to producers and using a deposit system.

5. Analysis of stakeholder feedback into MAPP

A lot of the feedback received from stakeholders in Manitoba is similar to what Cleanfarms heard from stakeholders during the development of Saskatchewan's grain bag recycling program.

This feedback points to the importance of developing a program that is simple, cost-effective and convenient. This needs to be complemented by a promotion & education campaign that clearly articulates key program elements (what's in vs. what's out, collection site locations and preparation steps) but also addresses the financial/administrative aspects of the program (how it is funded, how the EHF is calculated and what the EHF is used for).

One of the themes that is unique to the Manitoba consultation process (compared to Saskatchewan's) is a desire for guidance on how to manage ag plastics that are excluded from the program (silage film and bale wrap).

It is important to balance the feedback that indicates support for expanding the types of material managed by the MAPP with the feedback that expresses concern over costs that will be born by farmers or producers. Cleanfarms feels that the phased in approach recommended through the MAPP provides the right balance at this time.

Very little feedback was received from first sellers. This mirrors what took place in Saskatchewan (where engagement from first sellers generally increases after the stewardship program plan is approved). Cleanfarms will continue to reach out to first sellers after version 02 of the MAPP is submitted.

6. Incorporating stakeholder feedback into the MAPP

Version 02 of the MAPP incorporates feedback received through the consultation process:

- It provides more details about how Cleanfarms will work with collection sites to transition away from Phase II materials (silage film and bale wrap) to only Phase I materials.
- Regions where additional collection sites are likely required to increase accessibility have been identified.

- Some of the feedback about managing non-program material falls outside of the scope of Phase I of MAPP. Through its work in other jurisdictions, Cleanfarms will continue to explore ways to develop economies of scale that could allow for program expansion in Manitoba, keep apprised of end market developments and collaborate with other jurisdictions where appropriate. Information generated through this work and recommended next steps for program expansion, will be shared with the Manitoba Advisory Committee.

Appendix A – Samples key stakeholder groups sharing information about MAPP

Manitoba Forage & Grasslands Association – excerpt from October 2020 newsletter

Source: <https://myemail.constantcontact.com/MFGA-eBulletin--October-2020.html?soid=1106253726668&aid=K4GQuiJTcro>

Management of designated agricultural plastics waste

Manitoba Conservation & Climate plans to implement a fully regulated program for agricultural plastics (ex. grain bags, plastic twine) under authority of Manitoba's Packaging and Printed Paper Regulation. Cleanfarms Inc. has been tasked to consult with agricultural producer groups and to develop a plan for the management of designated agricultural plastics waste. This draft program plan is nearly complete and will be submitted to the Minister of Conservation & Climate on or around November 30, 2020. Learn more about the process and timelines here.

Manitoba Forage & Grasslands Association – excerpt from December 2020 newsletter

Source: <https://myemail.constantcontact.com/MFGA-eBulletin--Dec-2020.html?soid=1106253726668&aid=MyTJLmapZm4>

Farmers and Other Stakeholders Invited to Comment on Manitoba Plan to Transition to Permanent Ag Plastic Waste Recycling

A pilot project in Manitoba that collects and recycles plastic agricultural waste such as grain bags and baler twine is set to transition to a permanent, province-wide, industry-funded ag recycling program in 2021. Cleanfarms has developed a first draft of a stewardship transition plan and is inviting farmers, companies that supply ag plastics to farmers and other stakeholders to comment on it. Written comments accepted until January 12, 2021 to timmerk@cleanfarms.ca. Read the full Cleanfarms media release here.

Association of Manitoba Municipalities– excerpt from December 2020 newsletter

Source: <https://files.constantcontact.com/3ddc3f03301/707da145-46b4-47c7-8d29-40719af7f6c1.pdf>

Cleanfarms - Stewardship Program Plan for Ag Plastics



The Manitoba Ag Plastic Plan is now available for comment.

We invite stakeholders to review the **draft plan** (version 01) and provide written comments to **Cleanfarms** before January 12, 2021.

This plan was developed based on data collected through multi-year, government-funded pilot projects that took place in Manitoba and best practices in agricultural plastics recycling. The plan also prioritizes harmonization with initiatives underway across the Prairies.

Throughout winter 2020/2021, **Cleanfarms** is engaging with producer groups, industry and municipal associations to get feedback on the plan. Individual producers and Manitobans are welcome to provide feedback as well.

[Read more.](#)

Appendix B – Written feedback received on the MAPP (version 1)

Letters from key stakeholder groups:



January 13, 2021

Kim Timmer
Manager of Stakeholder Relations
Cleanfarms
10 Four Seasons Place, Suite 400
Etobicoke, ON M9B 6H7
timmerk@cleanfarms.ca

Re: Proposed Stewardship Program Plan for Designated Ag Plastics in Manitoba

Dear Ms. Timmer,

Manitoba Beef Producers (MBP) is pleased to provide feedback on the Proposed Stewardship Program Plan for Designated Agricultural Plastics in Manitoba, i.e. the Manitoba Ag Plastics Plan (MAPP).

MBP is the exclusive voice of Manitoba's cattle industry, representing approximately 6,300 producers across the province in the cow-calf, backgrounding and finishing sectors. MBP is a non-profit organization with a producer-elected board of 14 directors, each representing a distinct district of Manitoba. Our vision is a vibrant, prosperous, respected, sustainable beef industry in Manitoba.

Manitoba and Canadian beef producers have a strong interest in the sustainability of the industry, including the careful management of resources used in the course of production. The cattle sector is committed to producing more food using less resources and continuing to reduce its environmental footprint. Manitoba producers have appreciated the ability over the years to help ensure proper end of life disposal of products such as pesticide and fertilizer containers, twine, bale wrap and silage film, and old livestock and equine medications, among others. In some instances this has included the opportunity for certain of these products to be recycled if markets are available.

As MBP has noted in its past comments to Cleanfarms about agricultural recycling, the ability of some producers to readily access collection sites has been a cause for concern. MBP requests that efforts continue to address these gaps as it could help encourage greater uptake of recycling initiatives. Alternatively, the use of special collection events in some regions may be desirable to help address gaps in access. As stated in the report, convenience and accessibility are important.

MBP supports the principle that *"Cleanfarms will follow a phased in approach to designating materials to be included in the MAPP based on the availability of recycling markets."* MBP does not believe it is reasonable to apply an Environmental Handling Fee to products for which no recycling market is available. It is possible that advances in the ability to manage certain difficult to process products, such as silage film and bale wrap, will eventually provide the opportunity for these products to either to be more readily recycled or put to alternate uses, thereby creating market opportunities for them.



MBP cautions that cattle producers are price takers and do not have the ability to pass through the costs they will incur associated with EHF. The application of EHF on certain agricultural plastics will be an additional cost burden for producers. Therefore it is essential that effective, efficient and readily accessible recycling programs are developed to help encourage producer participation in product recovery efforts.

MBP agrees that education and promotion will be integral to the success of the new plan. Producers required to pay the EHF on products will want to ensure they are receiving value from the MAPP. MBP encourages Cleanfarms to work with a variety of stakeholders to facilitate this messaging, from local governments to producer organizations and stewards/first sellers.

Given that due to limited recycling market access only grain bags and baler twine will be collected at the collection sites when the MAPP commences, it will be important to inform producers of the long-term management strategy with respect to the other materials, i.e. silage film, bale wrap and netting. For example, how will producers be expected to manage these products in the interim? As noted in the discussion document, as smooth a transition as possible is desired.

MBP believes there is merit in Manitoba continuing to examine the possibility of harmonization with regulated or potentially-regulated programs in Saskatchewan and Alberta, particularly if it increases the likelihood of markets being achieved for agricultural plastics. MBP asks if the EHF charged on each product in each province will reflect the actual recovery costs in each jurisdiction.

MBP is seeking clarification as to how frequently the EHF will be reviewed. MBP requests that if there are changes to the EHF, that producers be provided with abundant notification of same.

MBP is seeking confirmation as to whether all monies generated through the EHF will remain with the MAPP, as opposed to some going into the general revenues of the Province of Manitoba.

MBP recommends there be a mechanism to follow up with all stakeholders at staged intervals to evaluate the effectiveness of the MAPP, with strategies to address challenges, as well as to capture potential opportunities.

Manitoba Beef Producers appreciates the opportunity to participate in this consultation on the stewardship transition plan. If you require additional information, please feel free to contact me at 204-772-4542 or via cillum@mbbeef.ca.

Sincerely,

Carson Callum
General Manager
Manitoba Beef Producers



601-386 Broadway
Winnipeg, MB R3C 3R6
204-697-1140
kap.ca

January 13, 2021

Kim Timmer
Manager, stakeholder relations
Cleanfarms Inc.
timmerk@cleanfarms.ca

Dear Ms. Timmer:

Re: The Manitoba Ag Plastic Plan

Thank you for the opportunity to provide input into the Manitoba Ag Plastic Plan (MAPP). Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture.

Farmers have an interest in environmental protection practices that promote a viable and sustainable agricultural industry in Manitoba. They mitigate against potential hazards resulting from the improper handling, storage, and disposal of farm inputs, participate in the development and implementation of environmental farm plans, and enroll in programming such as Cleanfarms' small container recycling program.

KAP supports Cleanfarms programming and initiatives that will increase the number of collection sites where farmers can bring recyclable products. Our members have requested that the list of products available for recycling be expanded and that recycling be made straightforward and accessible. For example, KAP policy supports the development of beneficial management practices (BMPs) that would help farmers recycle grain bags by cost-sharing the purchase of grain bag rollers. Grain bags that are emptied and rolled can be easily transported and are readily accepted by recyclers.

KAP encourages Cleanfarms to clearly communicate with farmers the location of recycling depots, proper management of recycled products to ensure they will be accepted, and other important administrative elements of the program that will help increase participation.

If you require further input from Manitoba's farmers or if you would like assistance in communicating with Manitoba farmers, please contact KAP policy manager Alanna Gray at alanna.gray@kap.ca.

Sincerely,

A handwritten signature in black ink that reads 'Bill Campbell'.

Bill Campbell, President
Keystone Agricultural Producers

Excerpts from emails received from stakeholders:

“A low level of allowable contamination will be a deal breaker some years.”

“I also echo the sentiment, that it has (to) be economical and the additional fees must be relatively low or there simply won't be uptake. Raising cattle is about the only industry where the producer has no control over his final price for the product. Grain producers know what they are getting prior to loading. Cattle guys not so much. Margins are very tight for those (of) us who are only in the cattle industry.”

“I am in favor of recycling plastic but putting the tax on this year could really hurt my business.”

“How many sites are you suggesting across the province and where?”

“The biggest issue is that to properly separate the materials, package the materials properly for the bags, then load it up and haul it to our site is a big inconvenience for farmers. That being said, there still are people who are getting behind the program, it is just taking some convincing and educating. We have been doing what we can at this end, if they bring it dirty or loose, we have been informing them of how to properly package the materials but taking care of it on our site with our staff. So I do think with more education it will continue to grow.”

Appendix C – Groups notified by email that the MAPP was available for comment

| | | |
|---|--|---|
| Agriculture and Agri-Food Canada | Manitoba Conservation and Climate | RM of Thompson |
| Air Greenway Ltd | Manitoba Cooperator | RM of Victoria |
| Amity Ag-Enterprises Inc | Manitoba Corn Growers Association | RM of West Interlake |
| Assiniboine River Basin Initiative | Manitoba Crop Alliance | RM of Yellowhead |
| Association of Manitoba Municipalities | Manitoba Flax Growers Association | Roblin-Cartwright Community Development Corporation (CDC) |
| BASF | Manitoba Forage & Grassland Association | Rosenau Transport LTD. |
| Berry Plastics | Manitoba Forage and Seed Association | RTR |
| Bower Farms | Manitoba Institute of Agrologists (MIA) | Rural Municipality of Dauphin |
| BrettYoung Seeds | Manitoba Pulse & Soybean Growers | Sammy's Farm Supply |
| Bridon USA | Manitoba Pulse & Soybean Growers | Shine |
| Brokenhead, Municipality of | Manitoba Seed Growers Association | Shur-Gro Farm Services Ltd. |
| Canadian Association of Agri-Retailers | Maple Leaf Agri- Farms | Shur-Gro MacGregor Branch |
| Canadian Council of Ministers of the Environment | Maple Leaf Foods | Sigma Stretch Film |
| Canadian Tarpaulin Manufacturers Ltd. | Marginet Farms | Solid Waste Area Management Project (SWAMP) |
| Cargill Limited | McKenzie and Associates | Southern Seed Ltd |
| City of Steinbach | Miller Environmental Corporation | Strategy Makers Consulting Inc. |
| Clean Harbors Environmental Services | Moran Farming Corp | Strathclair Co-op |
| Coldwell Eriksdale Waste Disposal Grounds | Mossey River Municipality | Swan Valley Co-op |
| Committed Ag Supply | Multi-Material Stewardship Manitoba | Tama Canada Inc. |
| Connery's Riverdale Farms Ltd. | Municipality of Bifrost-Riverton | The Pas & Area Recycling Centre |
| Conservation Sustainable Resource and Policy Management | Municipality of Brenda-Waskada | Thunder Seed |
| Dairy Farmers of Manitoba | Municipality of Harrison Park | Thunderstruck Ag Equipment |
| Dauphin Co-op | Municipality of McCreary | Town of Stonewall |
| Dauphin-Ochre Weed Control District Board | Municipality of Roblin | Twin Valley Co-op |
| Desorchers | Municipality of Two Borders | Under The Hill Farms |
| DL Seeds | Municipality of WestLake-Gladstone | University of Manitoba |
| Dunford Holdings Inc | MWM Environmental | Veikle Agro Inc. |
| Earthbound Environmental | Nadeau Seeds | Viterra |
| EastWestAgri | National Sunflower Association of Canada | Western Canadian Aerial Ltd - Wellwood |
| Ellis Seeds | Neepawa-Gladstone Co-op | Western Equipment Dealers Association |
| Ens Quality | Neeralta Manufacturing Inc. | Winnipeg Water and Waste Department |
| Even Spray | North Star Genetics | |
| Evergreen Environmental Technologies Ltd. | Omars Environmental | |
| Farmer | Parkway Co-op | |
| Federated Cooperatives Ltd. | Parrish & Heimbecker, Limited | |
| FLAMAN Group of Companies | Peavey Industries LP | |
| FP Genetics | Peavey Mart | |
| Friesen Prairie Honey Farm | Pembina Co-op | |
| Garden Valley Vegetable Growers | Pembina Co-op Notre Dame | |
| GBC Equipment | Pembina Valley Containers Ltd. | |
| Gilber Plains Co-op Agro Center | Pest Management Regulatory Agency | |
| GJ Chemical | Pilotmound Vet Clinic | |
| Grandview Municipality | Pitura Seeds | |
| Green Action Centre | Portage and District Recycling | |
| Hamiota Municipality | Portage la Prairie Regional Landfill | |
| Health Canada | Praire Roots Co-op | |
| Heritage Coop | Prairie Fruit Growers Association | |
| Heritage Co-op | Prairie Roots Co-op | |
| Hunterson Agricultural Research & Development Services | Product Care Association | |
| ICMS | Pulse Canada | |
| Interstate Batteries Recycling, Inc. | Re-Trac | |
| Issues Ink | RM of Armstrong | |
| Kelly Grain Farm | RM of Gimli | |
| Keystone Agricultural Producers | RM of Grey | |
| Kingdom Advance Group | RM of La Broquerie | |
| MAFRI | RM of Lakeshore | |
| Manitoba Aerial Applicators Association | RM of Norfolk-Treherne | |
| Manitoba Agriculture and Resource Development | RM of Pipestone | |
| Manitoba Beef Producers | RM of Pipestone | |
| Manitoba Canola Growers Association | RM of Riding Mountain West | |
| | RM of Rockwood | |
| | RM of Rosedale | |
| | RM of SpringField | |
| | RM of SpringField | |
| | RM of Stuartburn | |

Appendix D – Press release & media coverage of the MAPP consultation & process

Press release – December 16, 2020

Source: <https://cleanfarms.ca/farmers-and-other-stakeholders-invited-to-comment-on-manitoba-plan-to-transition-to-permanent-ag-plastic-waste-recycling/>

Farmers and Other Stakeholders Invited to Comment on Manitoba Plan to Transition to Permanent Ag Plastic Waste Recycling, December 16, 2020

A pilot project in Manitoba that collects and recycles plastic agricultural waste such as grain bags and baler twine is set to transition to a permanent, province-wide, industry-funded ag recycling program in 2021.

The organization that operates the provincially-funded pilot, Cleanfarms, has been asked by Manitoba Conservation and Climate (MCC) to develop and consult on a stewardship transition plan.

Cleanfarms has developed a first draft of the plan, [Manitoba Ag Plastic Plan](#), and is inviting farmers, companies that supply ag plastics to farmers and other stakeholders to comment on it. Written comments on this version can be submitted until January 12, 2021. They should be sent to Cleanfarms' Manager of Stakeholder Relations, Kim Timmer at timmerk@cleanfarms.ca

Comments are encouraged from producer groups, industry and municipal associations, as well as Manitoba farmers.

Cleanfarms developed the plan based on data collected in the Manitoba pilots and on best practices honed over years of running similar ag waste recycling programs across the Prairies. Part of the goal is to harmonize ag waste recycling programs in the Prairie provinces.

Once comments are received and processed, a second version of the plan will be submitted to MCC on January 30, 2021. Cleanfarms hopes to receive final plan approval from the provincial government by the end of March so that it can begin transition to the industry-funded model in early spring.

Funding for the permanent program will be managed through an Environmental Handling Fee (EHF) collected by companies that supply farmers with grain bags and twine at the time these items are purchased.

“Grain bags and twine are valuable tools that farmers use to grow food and to operate their farms more efficiently. However, these materials can be difficult to manage effectively at end of life. The Cleanfarms stewardship program would see them recycled into new products, such as plastic bags,” noted Cleanfarms Executive Director Barry Friesen.

Estimates suggest that approximately 1,400 tonnes of non-organic ag plastic waste are generated by Manitoba farms annually.

In 2019, Manitoba farmers returned 51 tonnes of ag plastic waste in the pilot program, up from 34 metric tonnes the year before.

“Studies have shown us that Manitoba farmers want recycling programs. We’re anticipating that should a permanent program move ahead, we’ll see the number of recovered tonnes start to climb steadily. And that’s good for Manitoba’s sustainable agriculture sector and the environment,” Friesen said.

A list of pilot collection sites is available on the [Cleanfarms/Manitoba](#) page on the Cleanfarms website.



Finding end markets for agricultural plastics is important. (Photo credit: Barbara McConnell)

Plans underway to transition cleanfarms ag plastic waste recycling pilots to permanent programs

Province Provides Grant to Support Pilots and Transition

BY BARBARA MCCONNELL
Media and Communications Consultant, CleanFarms

Sustainability is not new to farming but some producers have found it challenging in recent years as convenient farm tools like twine and plastic grain bags end up as hard-to-manage ag plastic waste.

Cleanfarms, a national, non-profit industry stewardship organization committed to environmental responsibility through proper management of inorganic agricultural waste has been working to change this.

Since 2013, Cleanfarms has been operating pilots in Manitoba to collect and recycle plastic ag waste generated on farms. Over the years, the project has grown to 37 recycling collection locations throughout the province's agricultural sectors. In 2019, Manitoba farmers took 51 tonnes of waste plastic to collection sites, up from 34 tonnes in 2018.

"This kind of participation is a clear indication that farmers are really interested in ways to improve the sustainability of their operations, particularly for products like plastic film and twine," said Cleanfarms' Manager of Stakeholder Relations, Kim Timmer.

This fall, the Government of Manitoba an-

nounced a grant of \$185,000 to continue the pilots as plans to transition them to a permanent, industry-funded, stewardship program are underway.

Timmer said the success of a permanent recycling program depends on:

- Ensuring there are strong markets for collected materials
- Giving farmers convenient access to collection points throughout the province, and
- Building awareness of the program among producers.

Cleanfarms is recommending a phased approach to the permanent, industry-funded program targeting ag plastics that can currently be recycled which, for now, includes grain bags (also known as grain silo bags or grain storage bags) and twine. Silage/bale wrap and netting will not be included until recycling end markets can be developed. The proposed time-

table is to transition in 2021.

About Cleanfarms

Cleanfarms is an agricultural industry stewardship organization that contributes to a healthier environment and a sustainable future by recovering and recycling agricultural and related industry plastics, packaging and products. It is funded by its members in the crop protection, crop storage, ag plastic and animal health industries.

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Advance Payments Programme de

Farms.com – December 18, 2020

Source: <https://www.farms.com/ag-industry-news/man-farmers-input-wanted-on-ag-plastic-recycling-063.aspx>

Man. farmers input wanted on ag plastic recycling
CleanFARMS is transitioning to an industry-funded program

By [Diego Flammini](#)
Staff Writer

An organization is asking Manitoba farmers to provide feedback on a permanent, province-wide, industry-funded ag recycling program.

CleanFARMS has been involved in ag plastics recycling initiatives in the province since about 2013 funded through Manitoba Conservation and Climate (MCC) and its predecessors.

MCC has now asked CleanFARMS to present a plan that would move the program from government-funded to industry-funded. MCC will also have the final say on if the plan is approved.

CleanFARMS submitted a first draft of its [Manitoba Ag Plastic Plan](#) on Nov. 30. Farmers and other stakeholders have until Jan. 21, 2021 to submit feedback.

“It would be similar to how most other recycling programs in the province for things like tires, oil and electronics is run,” Kim Timmer, manager of stakeholder relations with CleanFARMS, told Farms.com.

Electronic recycling in Manitoba, for example, is handled by the Electronic Products Recycling Association.

Consumers pay an Environmental Handling Fee (EHF) on the sale of new electronics. That fee helps pay for the recycling program.

The fees range from seven cents to \$20 depending on the item.

As part of the CleanFARMS plan, EHF's would be applied during the sale of grain bags and baler twine.

These fees would be 25 cents per kilogram (\$250 per tonne) of grain bags and 33 cents per kilogram (\$330 per tonne) of baler-twine, the organization's plan says.

Another possible phase detailed in the plan outlines potential EHF's applied to silage film and bale wrap.

Early conversations with producers indicate they are willing to support a program like this to help the environment, Timmer said.

“Through conversations we've had, farmers are looking for ways to improve the sustainability of their farm,” she said. “Our challenge will be making it as convenient for them as possible.”

CleanFARMS hopes to receive word from MCC by the end of March 2021 whether their plan is approved or not.

If it is, EHF's will begin to be implemented in December 2021.

Anyone who wishes to provide feedback about the plastics recycling program can contact Kim Timmer at timmerk@cleanfarms.ca.

Pembina Valley Online – December 21, 2020

Source: <https://pembinavalleyonline.com/ag-news/cleanfarms-looking-for-comments-on-manitoba-ag-plastic-plan>

Cleanfarms Looking For Comments On Manitoba Ag Plastic Plan

Written by Cory Knutt

A pilot project in Manitoba that collects and recycles plastic agricultural waste such as grain bags and baler twine is set to transition to a permanent, province-wide, industry-funded ag recycling program in 2021. The organization that operates the provincially-funded pilot, Cleanfarms, has been asked by Manitoba Conservation and Climate (MCC) to develop and consult on a stewardship transition plan.

Cleanfarms has developed a first draft of the plan, Manitoba Ag Plastic Plan, and is inviting farmers, companies that supply ag plastics to farmers and other stakeholders to comment on it. Written comments on this version can be submitted until January 12, 2021. Comments are encouraged from producer groups, industry and municipal associations, as well as Manitoba farmers.

Cleanfarms developed the plan based on data collected in the Manitoba pilots and on best practices honed over years of running similar ag waste recycling programs across the Prairies. Part of the goal is to harmonize ag waste recycling programs in the Prairie provinces.

Once comments are received and processed, a second version of the plan will be submitted to MCC on January 30, 2021. Cleanfarms hopes to receive final plan approval from the provincial government by the end of March so that it can begin transition to the industry-funded model in early spring.

Funding for the permanent program will be managed through an Environmental Handling Fee (EHF) collected by companies that supply farmers with grain bags and twine at the time these items are purchased.

“Grain bags and twine are valuable tools that farmers use to grow food and to operate their farms more efficiently. However, these materials can be difficult to manage effectively at end of life. The Cleanfarms stewardship program would see them recycled into new products, such as plastic bags,” said Cleanfarms Executive Director Barry Friesen.

Estimates suggest that approximately 1,400 tonnes of non-organic ag plastic waste are generated by Manitoba farms annually. In 2019, Manitoba farmers returned 51 tonnes of ag plastic waste in the pilot program, up from 34 metric tonnes the year before.

“Studies have shown us that Manitoba farmers want recycling programs. We’re anticipating that should a permanent program move ahead, we’ll see the number of recovered tonnes start to climb steadily. And that’s good for Manitoba’s sustainable agriculture sector and the environment,” added Friesen.

Comments can be sent to Cleanfarms’ Manager of Stakeholder Relations, Kim Timmer at timmerk@cleanfarms.ca

Manitoba Cooperator - December 22, 2020

Source: <https://www.manitobacooperator.ca/news-opinion/news/farmers-ag-groups-asked-for-feedback-on-recycling-plan/>

Farmers, ag groups asked for feedback on recycling plan

Cleanfarms is set to transition its Manitoba pilot to a permanent, province wide program

By [Manitoba Co-operator Staff](#)

Farmers, producer groups and agricultural suppliers in Manitoba are invited to give feedback on a plan for a province-wide agricultural waste recycling program.

Cleanfarms, which recycles ag plastics and waste across the Prairies, is preparing to transition its Manitoba pilot to a permanent, industry-funded recycling program it said in news release on December 16.

It's looking for feedback on the first draft of its plan to do so.

Since 2013, Cleanfarms has run a government-funded, pilot-scale program in Manitoba. It gathered and recycled plastic containers and totes, and also periodically gathered unwanted animal medications and pesticides.

According to the draft Manitoba Ag Plastics Plan, Cleanfarms would begin collecting grain bags and baler twine in April 2021. A second phase, adding silage film and bale wrap would be added eventually.

"Stewards" or "First Sellers" would be responsible to provide the collection and recycling program to handle the materials. These stewards and sellers would also collect an environmental handling fee on the designated items, which they'd forward to Cleanfarms to finance the program.

The draft plan says the environmental handling fees would roll out in December 2021, to be determined in a per kilogram basis.

Cleanfarms would continue to ensure that the items are recycled or "managed responsibly," the plan says.

Written comments can be submitted until January 12, and should be sent to Kim Timmer, Cleanfarms' manager of stakeholder relations at timmerk@cleanfarms.ca.

Cleanfarms will incorporate feedback into a report to be sent to Manitoba Conservation and Climate on January 30. The organization said it hopes to receive approval from the province by the end of March so it can begin the transition to the industry-funded model in early spring.

Manitoba Cooperator – January 8, 2021

Source: <https://www.manitobacooperator.ca/news-opinion/news/ag-waste-recycling-program-to-become-permanent/>

Ag waste recycling program to become permanent
Surveyed producers pro-recycling but leery about environmental fees

Geralyn Wichers

Agricultural waste recycler Cleanfarms is on its way to becoming a permanent, industry-funded program in Manitoba.

This will likely mean more opportunities for producers to recycle grain bags, baler twine and other plastics. It will also mean paying for it.

On November 30, Cleanfarms released a draft of its Manitoba Agriculture Plastics Plan (MAPP) and asked for producers, ag groups, retailers and other potential participants to give feedback. It will continue to accept feedback until January 12.

Feedback will be incorporated into the plan, which will then be sent to Manitoba Conservation and Climate for approval, the organization said in a pre-Christmas news release.

Cleanfarms collects and recycles ag plastics across the Prairie provinces. Since 2013 it has operated on a pilot (provincially funded) basis in Manitoba with 37 collection sites, the draft MAPP says. In 2018, at the province's behest, it began consultations on how to transition to a permanent, industry-funded model.

If approved as written, Cleanfarms' plan would see a permanent program begin in April to collect grain storage bags and baler twine. These items were also gathered in the pilot program.

As market demand allows, a second phase would see silage film and bale wrap added to the list of collected items (this is listed as "TBD" in the MAPP).

Similar to under the pilot, producers would be responsible to roll grain bags and bag baler twine and deliver these to collection sites (pilot locations were mainly at municipal landfills).

"There is no fee for dropping off grain bags or baler twine that is prepared properly," the MAPP says.

However, the program (as planned in the draft) will be "fully financed through an Environmental Handling Fee (EHF) collected and remitted to Cleanfarms by first sellers of designated ag plastics," the MAPP says.

The fee will be determined by dividing total program costs (minus recycling revenue) by total weight of products distributed. Cleanfarms estimates the fee for grain bags will be \$0.25 per kg and \$0.33 for baler twine.

"If the plan is approved, we will work with stewards and retailers to determine a per-item EHF based on commonly sold sizes," said Barbara McConnell, media and communications consultant with Cleanfarms.

"Under the draft plan, the (environmental handling fee) is mandatory, so all producers who choose to buy twine and grain bags, will pay the EHF to help manage the used grain bags and twine at end of life," she said.

Most producers aren't thrilled about mandatory fees on their plastic, but understood the need to support a recycling program, the MAPP said. This is based on a survey Cleanfarms did in 2019 with 355 crop and livestock farmers.

Fifty-eight per cent opposed paying the environmental handling fee. Fifty-three per cent said they'd be OK with paying the fee if the program is easy to use and accessible.

Just 24 per cent of producers who use twine, bale or silage wrap and grain bags said they were aware of the pilot project (despite being in 27 locations spread across agro-Manitoba).

Seventy-seven per cent of the same group said they were likely to participate if a collection site was in their area. Eighty-two per cent of the group said they are supportive of a province-wide recycling program for these items (49 per cent were "very supportive").

Cleanfarms said it will focus promotion efforts on educating farmers about the environmental handling fee. It will also work on educating producers, retailers and collection site stewards on the program.

Manitoba will follow Saskatchewan's program-funding model, which compensates collection sites for annual capital costs and also pays them based on the volume of materials collected.

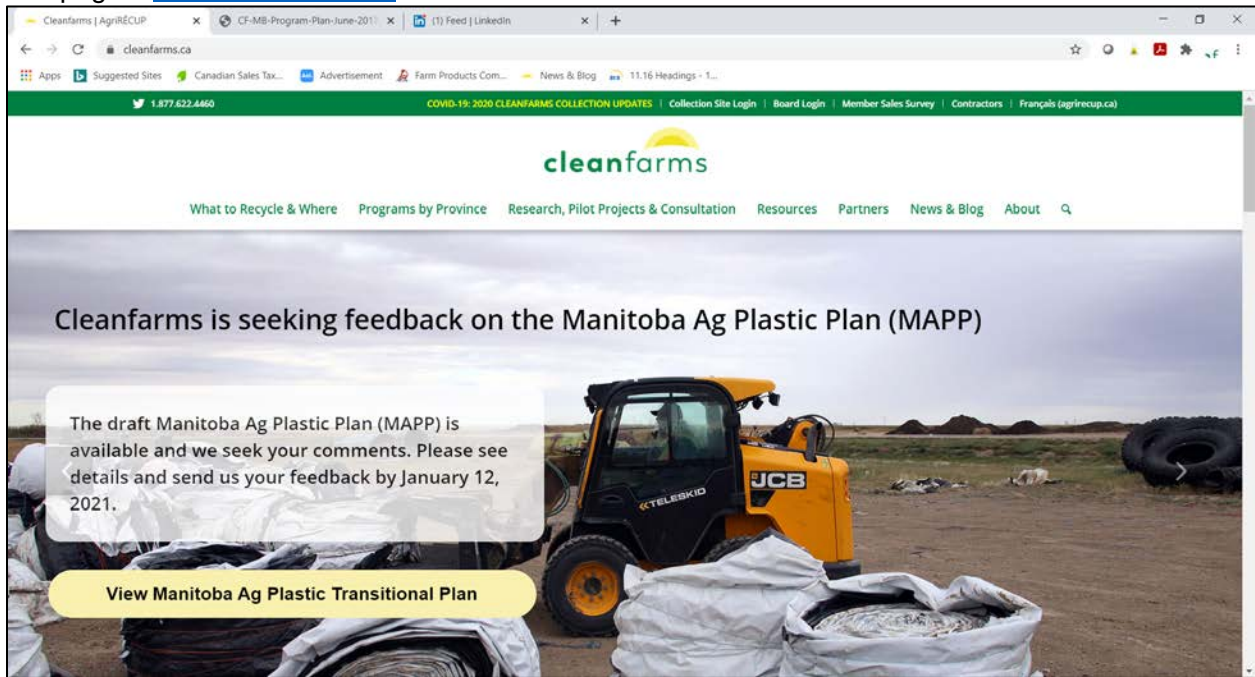
Cleanfarms estimated the incentive at \$55 per tonne.

Cleanfarms said it plans to submit the amended MAPP to the province by January 30 and hopes to receive approval by the end of March.

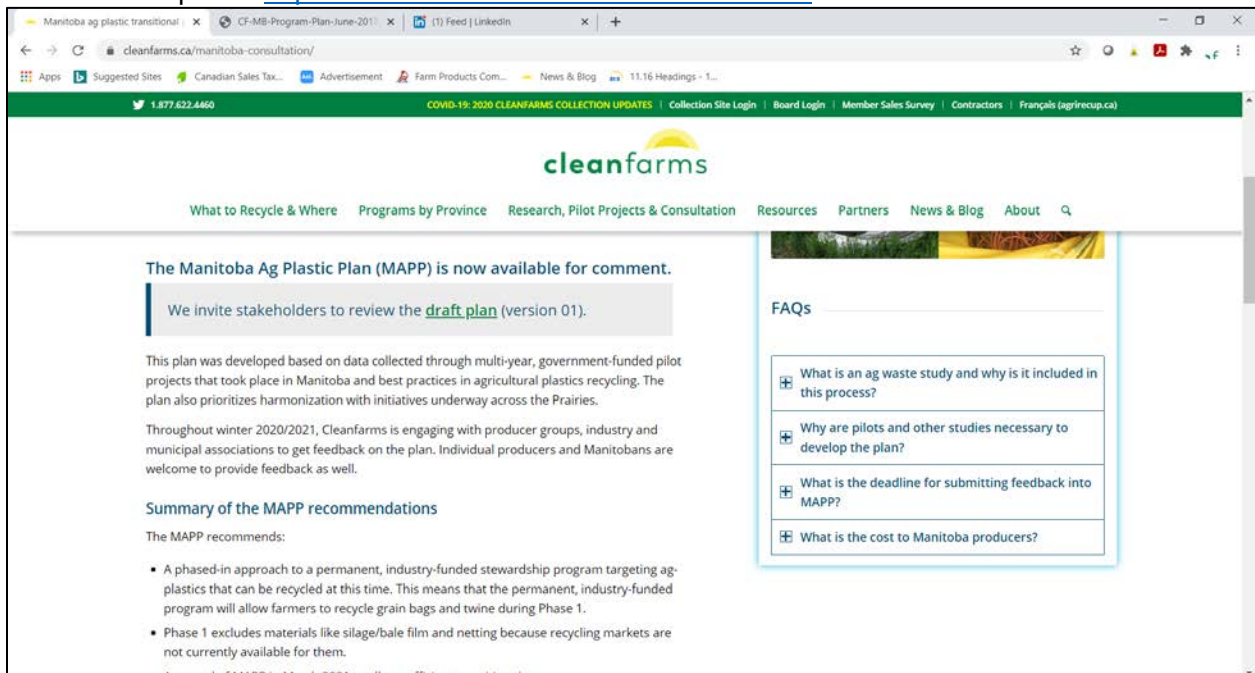
Appendix E – Tools used through the consultation process

Cleanfarms website:

Homepage – www.cleanfarms.ca



Dedicated web portal: <https://cleanfarms.ca/manitoba-consultation/>



Full text from <https://cleanfarms.ca/manitoba-consultation/> (as of November 30, 2020)

Developing an ag plastics recycling roadmap, 2018 to 2020

Cleanfarms is conducting consultations at the request of [Manitoba Conservation and Climate](#), to help the province evaluate transitioning the government-funded ag plastics pilot projects into a permanent, industry-funded stewardship program.

The Manitoba Ag Plastic Plan (MAPP) is now available for comment.

We invite stakeholders to review the [draft plan](#) (version 01).

This plan was developed based on data collected through multi-year, government-funded pilot projects that took place in Manitoba and best practices in agricultural plastics recycling. The plan also prioritizes harmonization with initiatives underway across the Prairies.

Throughout winter 2020/2021, Cleanfarms is engaging with producer groups, industry and municipal associations to get feedback on the plan. Individual producers and Manitobans are welcome to provide feedback as well.

Summary of the MAPP recommendations

The MAPP recommends:

- A phased-in approach to a permanent, industry-funded stewardship program targeting ag-plastics that can be recycled at this time. This means that the permanent, industry-funded program will allow farmers to recycle grain bags and twine during Phase 1.
- Phase 1 excludes materials like silage/bale film and netting because recycling markets are not currently available for them.
- Approval of MAPP in March 2021 to allow sufficient transition time.
- Launch of the Environmental Handling Fee associated with MAPP in December 2021.

For more information, please visit the [MAPP](#) or email [Kim Timmer](#)

MAPP Consultation

The government-funded agricultural plastics recycling pilots have been in place since 2013. In 2018 the Manitoba government asked Cleanfarms to develop a plan to transition the pilots. The following is a summary of the work completed since then and plans for early 2021.

2018 – 2019 – Completed

- Preliminary discussions with producer groups (late 2018) to inform stakeholders about learnings from the pilot projects, key challenges faced (limited recycling markets) and the benefits and financial implications of a permanent, industry-funded stewardship program
- Completed an [ag waste study](#) to estimate the volume of ag plastics used on Manitoba farms. This data is used to estimate program costs and establish targets
- Fielded a producer survey (2019); producers weighed in on key aspects of the program and provided input to help assess existing pilot projects
- Pilot projects continued throughout the province (2018-2019) with a focus on increasing producer accessibility to collection sites (which is key to participation) and to continue to evaluate the availability of recycling markets. Manitoba farmers turned in 51 tonnes of ag plastics in 2019, surpassing the 34 tonnes that was collected in 2018.

Fall/winter 2020

- Pilot projects continue
- Development of The Manitoba Ag Plastic Plan (MAPP)

- Consultations on MAPP, delayed due to COVID-19, restarted in the fall of 2020
- Consultations took place online/remotely and focused on engaging producer groups, collection sites, municipalities and key government officials

Winter 2021

- Consultations with key stakeholders will continue
- Feedback received before January 12, 2021 will be incorporated into the next draft of the MAPP which will be submitted to Manitoba Conservation and Climate Change on January 30, 2021
- Development of a plan to transition existing collection sites to the MAPP collection criteria (targets grain bags and twine for collection only)

Spring 2021 & beyond

Once Cleanfarms receives approval of the MAPP, the transition process will proceed. This will include:

- steward education, outreach and onboarding
- promotion and education to producers/farmers
- collection site recruitment & signing of agreements
- further roll out of MAPP

For more information:

Please email timmerk@cleanfarms.ca

FAQs

What is an ag waste study and why is it included in this process?

There's an old adage in waste management, that you can't manage what you can't measure, and ag waste studies provide just the information that's needed for effective program development and management. They are desktop studies used to estimate waste composition and generation, typically based on:

- Units of production – e.g. head of cattle, acres per crop, which are available through Statistics Canada and other sources, and
- Waste generated per unit of production – taken from various farm level activities waste and reviewing how these inputs are packaged.

In Manitoba, insights provided from studies completed in province in [2011](#) (prior to the launch of the pilot programs and [2019](#) have provided valuable inputs to considerations for program development.

Why are pilots and other studies necessary to develop the plan?

Pilots are critical to effective program planning as they permit farmers, collection sites and program designers time to test different approaches and to seek cost-effective mechanisms for delivery. In this case, it's become clear that Manitoba producers use a wide variety of ag plastics and in relatively small quantities compared to other Prairie provinces. Multi-year pilots that have scaled up, an ag waste study and additional work will allow program designers to develop a robust and thoughtful path forward for the province.

What is the deadline for submitting feedback into MAPP?

Feedback received prior to January 12, 2021 will be incorporated into new MAPP (version 2) that will be submitted to Manitoba Conservation and Climate Change on January 30, 2021.

What is the cost to Manitoba producers?

MAPP will be fully financed through an Environmental Handling Fee (EHF) collected and remitted to Cleanfarms by companies that supply producers with grain bags and twine. Preliminary estimates are in the \$250/tonne range for grain bags and \$330/tonne range for twine.



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Regulatory Framework

Manitoba's Packaging and Printed Paper Regulation

- Agricultural plastics fall under the definition of "packaging"
 - 'designated ag plastics'
- Industry is obligated to finance a recycling/collection program:
 - 3(1) No person shall supply designated material for consumption unless (a) the steward of the designated material operates or subscribes to a[n approved] stewardship program; or (b) the person operates or subscribes to a[n approved] stewardship program.
- Government approves a 'stewardship program'
 - creates a level playing field for industry



3

Stewardship Plans must be approved by Minister, and include provision for:

- Physical management of 'waste ag plastics'
- Financial management of all related Environmental Handling Fees, program expenses and revenues
- Good governance and transparent reporting
- Promotion & education activities
- On going consultations with affected stakeholders



4

The role of Farmers/Producers under the Regulation

- Farmers/producers who purchase the designated ag plastics will be affected by Environmental Handling Fees established to fund the program (similar to tires, oil)
 - Majority of respondents to 2019 Grower Survey agreed, at least somewhat, to the statement "I don't like additional fees but understand the need to support a recycling program."
- Farmers/producers are in no way obligated to recycle designated ag plastics under the regulation. (Although increasingly strict municipal by-laws, landfill restrictions, burning prohibitions and other disincentives likely to factor in over time.)
- Regulation explicitly prohibits user fees at the point of collection
 - Value added services allowed; fees for improperly prepared materials



5

Cleanfarms' role

- Cleanfarms is a not-for-profit organization that delivers industry-funded end-of-life stewardship programming in the agricultural sector:
 - Key programs: empty container recycling & unwanted pesticide & livestock medication collections
- Funded by industry: Manufacturers, distributors and retailers of pest control products, fertilizers, seed, equine/livestock medications and grain bags.
 - 11 registered grain bag stewards support Saskatchewan's grain bag recycling program.



6

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Cleanfarms' role

- Since 2013, Cleanfarms has also partnered with Manitoba (Green Manitoba/Ministry of Sustainable Development/Conservation of Climate) to deliver a multi-phased agricultural plastics recycling pilot project. The final phase of the pilot is underway.



7

Proposed Work Plan & Timelines

| | | |
|---|---|--|
| 1 | Re-engage key stakeholder groups to provide update on progress to date, notify of timelines and process for transition from pilot program to regulated EPR. | Oct/Nov 2020 |
| 2 | Submit/present Draft program plan to Manitoba Minister of Conservation and Climate | Nov 30, 2020 |
| 3 | Distribute/present Draft program plan to stakeholders and start member recruitment (member recruitment will continue until EHC takes effect) | Dec 2020 |
| 4 | CleanFARMS to support government consultations and submit revised PMP if/as needed | Jan - Mar 2021 |
| 5 | PMP approved, announce final details, timelines and implementation/transition plan and initiate communications plan leading up to EHF and program launch | Mar 21 (subject to Ministerial decision) |
| 6 | Government-funding for the pilot program will end. Cleanfarms will continue to deliver the program to ensure no disruption of service to farmers/producers | Apr 2021 |
| 7 | EHF takes effect | Dec 1, 2021 |

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Program Development & Consultation Process

Completed To Date (Highlights)

- Internal discussions with Cleanfarms' members through SK process (harmonization is important to industry)
- Dec 3, 2018 consultation meeting with key Manitoba ag sector stakeholder groups
- Regular discussions with Manitoba municipalities and recyclers (AMM, MARR)
- Monitoring and responding to resolutions (ex. KAP April 2018, Municipal Associations May 31, 2018, other)
- Ongoing dialogue with farmers and stakeholders through 5 Phases of Manitoba pilot program.
- 2019 Manitoba Farmer Survey
- August 2020 Collection Site Consultation

Next steps towards submission of draft PMP (Sept-Nov 30, 2020)

- Directly re-engage and update stakeholders on process towards PMP, program launch, and EHF start including the following stakeholders:
 - Manitoba Agriculture
 - Keystone Ag Producers
 - MB Canola Growers Assoc
 - Manitoba Beef Producers
 - Dairy Farmers of MB
 - MB Forage & Grassland Assoc
 - AMM
 - MARR
 - Others?
- Work with above groups to communicate to farmers/producers through their channels
- Update website

After draft PMP submitted

- Distribute DRAFT to stakeholders and continue dialogue
- Support Minister's public consultation process
- Initiate member recruitment

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MB Ag Plastics Program Plan – Under Review

Proposing to phase in materials over time:

Phase 1: Grain bags & twine



Phase 2 (tbd) : Add silage wrap and/or bale wrap



**Excludes net wrap (no recycling markets & handled as a contaminant.)*




10

MB Ag Plastics Program Plan – Under Review

Continuation of pilot operations:

- Depot style collection system
- 35+ collection sites located in ag-intensive areas of the province
- Collection sites accept:
 - Rolled grain bags
 - Properly prepared twine



11

MB Ag Plastics Program Plan – Under Review

- **Early estimates:**
 - Gross program cost: \$160,000 to \$180,000
 - Total volume recycled: 225 to 250 tonnes
 - Grain bag EHF: \$250/tonne; Twine EHF: \$330/tonne
- **EHF begins December 2021**



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Your Questions and Feedback on Draft Plan

Project Lead: Kim Timmer, Manager Stakeholder Relations
Phone: 416-622-4460 ext. 2229
Email: timmerk@cleanfarms.ca

Manitoba Support: Mike Fernandes, StrategyMakers Consulting Inc.
Phone: 204-223-4460
Email: mikefernandes@strategymakers.ca





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About Cleanfarms

- Cleanfarms is a not-for-profit organization that delivers industry-funded end-of-life stewardship programming in the agricultural sector.
- Our members include Canada's leading developers, manufacturers, distributors and retailers of pest control products, fertilizers, seed, equine/livestock medications and grain bags.
 - **12 registered grain bag stewards (~95%)**
- Cleanfarms' empty pesticide and fertilizer recycling container program operates as one of Manitoba's Industry Stewardship Programs.
- Since 2012, Cleanfarms has also partnered with Manitoba (Green Manitoba/Ministry of Sustainable Development/Conservation of Climate) to deliver a multi-phased agricultural plastics recycling pilot project. Phase 5 of the pilot was just recently approved.



3

Cleanfarms team

General Oversight: Barry Friesen, Executive Director
Phone: 416-622-4460
Email: friesenb@cleanfarms.ca

Project Lead: Kim Timmer, Manager Stakeholder Relations
Phone: 416-622-4460 ext. 2229
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Manitoba Support: Mike Fernandes, StrategyMakers Consulting Inc.
Phone: 204-223-4460
Email: mikefernandes@strategymakers.ca



4

Proposed Work Plan & Timelines

| Work Plan Stage | Proposed Tasks | Timeline |
|--|---|----------------|
| 1 – Re-engaging stakeholders, building on progress to date; PMP Development & Submission to Government | 1 Development and approval of workplan and timelines | Aug-20 |
| | 2 Meet with provincial ministry representatives to present workplan and confirm Manitoba's intentions, timelines, objectives and willingness to invest in the program planning and development stage | Sep-20 |
| | 3 Re-engage key stakeholder groups to provide update on progress to date, to discuss transition from pilot program to regulated EPR, and to notify of timelines and process towards collection program launch and EHF start | Sep-20 |
| | 4 Develop and distribute public notices and information materials through stakeholder and other available and targeted channels. | Oct-20 |
| | 5 Submit/present First Draft of PMP to government | Nov 30, 2020 |
| | 6 Distribute/present First Draft of PMP to stakeholders and start member recruitment (member recruitment will continue until EHC takes effect) | Dec-20 |
| 2 - Government consultation period | 7 CleanFARMS to support government consultations and submit revised PMP if/as needed | Jan - Mar 2021 |
| 3 - PMP approved; initiate communication and preparation stage | 8 PMP approved, announce final details, timelines and implementation/transition plan and initiate communications plan leading up to collection program launch and EHF start. | Mar-21 |
| 4 - Collection Program launches | 9 Cleanfarms will officially launch designated agricultural plastics collection program for Manitoba. | May 1, 2021 |
| 5 - EHC and program implementation | 10 EHF takes effect | Dec 1, 2021 |

5

Program Development & Consultation Process

Completed To Date (Highlights)

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 - MB Canola Growers Assoc
 - Manitoba Beef Producers
 - Dairy Farmers of MB
 - MB Forage&Grassland Assoc
 - AMM
 - MARR
 - Others?
- Work with above groups to communicate to farmers/producers through their channels
- Update website

After draft PMP submitted

- Distribute DRAFT to stakeholders and continue dialogue
- Support Minister's public consultation process
- Initiate member recruitment

6

MB Ag Plastics Program Plan – Preliminary Outline

Introduction
 Program Summary
 Organizational Structure

- Steward of Designated Materials
- Board
- Western Canada Agricultural Stewardship Committee
- Manitoba Advisory Committee
- Staff

Designated materials

- Description of products targeted by the program
- Phased in Approach
- What's in & What's Out
- Product Definitions
- Rational for a phased-in approach

Program details

- Pilot project summary
- Collection
- Special collection sites
- Agricultural intensive areas
- Key collection site responsibilities

Program details continued

- Collection site compensation
- Transportation and consolidation
- End of life management of designated materials

Program funding

- EHF
- Determining the EHF
- Preliminary EHFs
- Program budget forecast

Promotion & Education

Performance Measures

Dispute Resolution

Appendices

- Support from stakeholders (resolutions, letters of support, endorsements)
- Promotion and Education materials developed through pilot program
- Consultation report
- Cleanfarms Code of Conduct
- Summary of results from 2019 Manitoba Farmer Survey

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Questions & Next Steps

- Has AMM made any recent formal resolutions and/or policy statements related to the recycling of agricultural plastics?
- Would AMM assist in publishing/distributing basic information about the ag plastics recycling program plan to your members, including process and timelines? What channels may be appropriate (ex. website? Newsletter? etc., and what are upcoming deadlines?
- Please forward this information to your Environment Committee and ask them if they'd like us to present more information to them before Nov 30th to get their initial input/feedback as we work to put together the plan document for submission and further consultation.



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