New Brunswick Stewardship Plan for Packaging and Paper 2026-2028

1. Introduction

This New Brunswick Stewardship Plan for Packaging and Paper (Stewardship Plan) is being submitted to Recycle New Brunswick (Recycle NB) on behalf of the producers who have selected Circular Materials to act as their producer responsibility organization (PRO) in compliance with the Designated Materials Regulation under the *Clean Environment Act* (Regulation) for Packaging and Paper (PPP). The Stewardship Plan covers a three-year period between January 1, 2026 and December 31, 2028. For clarity, it replaces the existing Stewardship Plan for Packaging and Paper due to expire on December 31, 2026.

1.1. Acronyms Within this Stewardship Plan

Below is a list of acronyms and abbreviations used throughout this Stewardship Plan:

- **EPR:** Extended producer responsibility
- **HDPE:** High Density Polyethylene
- **LDPE:** Low Density Polyethylene
- **PE:** Polyethylene
- **PET:** Polyethylene Terephthalate
- **PP:** Polypropylene
- **Recycle NB:** Recycle New Brunswick
- **Regulation:** Designated Materials Regulation (2024-37) under the *Clean Environment Act*
- **Stewardship Plan:** New Brunswick Stewardship Plan for Packaging and Paper
- **Act:** The *Clean Environment Act*

2. Circular Materials

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

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

Circular Materials has registered the trade name Circular Materials to operate in New Brunswick and meets the criteria for a producer responsibility organization, as defined in section 2 of the Regulation, and for the purposes of section 37 of the Regulation.

- Circular Materials is incorporated federally as a not-for-profit organization and has registered the trade name Circular Materials to operate in New Brunswick;
- Circular Materials' mandate is to represent any producer that seeks to meet its obligations under EPR regulations across Canada;
- Circular Materials is governed by producers and is committed to robust, transparent and representative governance by producers;
- Circular Materials has the abilities, skills and qualifications to diligently and professionally represent its subscribing producers;
- Circular Materials is providing and will continue to provide services in New Brunswick in English and French;

- Circular Materials will have on staff a bilingual person with residence in New Brunswick.
- Circular Materials will act on behalf of any producer obligated under the Regulation that executes a producer services agreement with Circular Materials;
- Circular Materials is committed to providing compliance services to its subscribing producers on fair and equitable terms; and
- Circular Materials is free of any real or perceived conflict of interest with any portion of its duties as an agent to producers.

3. Producers

The producer of a designated material is

a) the brand-holder[1] of the designated material if the brand holder has a permanent establishment[2] in Canada

b) in the absence of a person referred to in paragraph (a), the importer[3] of the designated material into New Brunswick if the importer has a permanent establishment in New Brunswick; or

c) in the absence of a person referred to in paragraph (a) or (b), the retailer[4] of the designated material that supplies[5] the designated material to the consumer.

These producer hierarchies include the supply of paper products, packaging-like products and packaging via e-commerce. Producers are responsible for all paper products, packaging-like products and packaging supplied to consumers in New Brunswick, regardless of whether it is supplied by e-commerce.

When a retailer sells designated materials by means of a physical or electronic marketplace that is owned by a marketplace facilitator, the marketplace facilitator shall be deemed to be the retailer.

Where the producer determined in accordance with this section is a business operated wholly or in part as a franchise, the producer is the franchisor if that franchisor has franchisees that are resident in New Brunswick.

3.1. Exemptions

A packaging or paper producer is exempt from the requirements of this Regulation in the following circumstances;

a) the producer generates less than $2,000,000 in gross annual revenue in the Province;

b) the producer manufactures, distributes, sells or offers for sale less than one tonne of packaging and paper annually in the Province; or

c) the producer is a charitable organization registered under the Income Tax Act (Canada).

For example, if a brand holder is an exempt producer, because it:

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[1] A "brand holder" means a person who owns or licenses a brand or who otherwise has rights to market a product under the brand.

[2] Permanent establishment means a permanent establishment as defined under section 4 of the Regulations.

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

[4] A "retailer" means a business that supplies products to consumers, whether online or at a physical location.

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

- generates less than two million dollars in gross annual revenue in New Brunswick; or
- it supplies less than one tonne of packaging and paper annually in New Brunswick, then the importer is required to report the Exempt Producer's paper and packaging supplied in New Brunswick.

A brand holder, importer or retailer that generates less than two million dollars in gross annual revenue in New Brunswick or manufactures, distributes, sells or offers for sale less than one tonne of packaging and paper annually in New Brunswick is an Exempt Producer. Subject to a Voluntary Producer Policy, if any, a brand holder or importer may volunteer to be the obligated producer for the packaging and paper it supplies into New Brunswick.

In instances where the brand holder or importer is exempt from the obligations of a Producer because it does not meet the revenue or tonnage thresholds described above, the exempt Producer's designated material should not be reported by the entity next in the hierarchy (e.g., the importer or the retailer, as would be otherwise applicable). In other words, an Exempt Producer's designated materials would not be reported by any one of the brand holder, the importer or the retailer.

Circular Materials will undertake identifying companies that are obligated producers under the Regulation. Any entity that Circular Materials identifies as a possible obligated producer that, after efforts have been made by Circular Materials to bring the producer into compliance, has not entered into a contract with Circular Materials will be referred to Recycle NB.

Circular Materials will levy fees on its subscribing producers to recover costs to implement the Stewardship Plan. Program costs will include Circular Materials' costs to meet regulatory compliance obligations.

4. Designated Materials

4.1. Paper

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

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

Table 4.1 Categories of Paper

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

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

4.2. Packaging and Packaging-Like Products

Packaging includes primary packaging[6], convenience packaging[7] and transport packaging[8] that is provided with a product, but does not include

- Packaging intended to be used for long term storage,
- Packaging intended to be reused or refilled for at least five years, or
- Packaging-like products do NOT include those designed for long-term use, for containment of waste, and those that are unsafe or unsanitary, or could become unsafe or unsanitary by virtue of their anticipated use. The following are examples of packaging-like products that are not included: totes and buckets, garbage bags, recycling bags, dog waste bag, biohazard waste bins and bags, etc.

Packaging-like product includes aluminum foil, a metal tray, plastic film, plastic wrap, wrapping paper, a paper bag, beverage cup, plastic bag, plastic container, cardboard box or envelope that is not used as packaging when supplied to a consumer but is normally used for containment. Packaging-like product includes single-use products, as well as those realistically intended to be used for a short term, typically for a period of five years or less, regardless of whether they can be re-used or not. For example, some reusable plastic food storage containers are made with plastic materials that are less durable and tend to break easily. The five-year time frame is intended to separate these items from more durable types of plastic materials, such as large plastic storage totes, which are designed for durability and tend to have much longer life spans[9].

The following categories of packaging and packaging-like products are included in this Stewardship Plan[10].

Gable Top Containers	**Definition**: Includes Gable Top polycoated cartons used for non-beverage products, and any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. **Examples**: Dairy products, dairy substitutes, fortified beverages (source of protein) meal replacements, molasses, sugar, confectionery products, laundry and cleaning products.
Aseptic Containers	**Definition**: Includes aseptic polycoated and foilized boxes and containers used for non-beverage products, and any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.

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

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

[8] Transport packaging is material used in addition to primary packaging to facilitate the handling or transportation of one or more products by persons other than end users but does not include a shipping container designed for transporting things by road, ship, rail or air. Transport packaging is not typically provided with products that are supplied to consumers for their personal, family or households purposes, although there are some instances where this may occur. For example, when products are shipped directly to a consumer's residence, transport packaging may be used to facilitate the delivery of such products. More commonly, transport packaging used to deliver products to a retailer is removed prior to displaying the product on the store shelves. Transport packaging that is never supplied to consumers for their personal, household or family purposes is not designated under the Regulation and is not included in this Stewardship Plan

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

[10] For clarity, the information provided in Table 4.2 is intended to support Producers in their reporting obligations to Circular Materials.

	Examples: Dairy products, dairy substitutes, fortified beverages (source of protein) meal replacements, soups, sauces and other non-beverages.
Single-sided Polycoated Paperboard	**Definition**: Includes packaging made from paperboard that has a polyethylene (or other plastic) coating on the inner side of the packaging only. **Examples**: Paper cups and bowls provided at quick service restaurants to serve foods and beverages. Paper takeout boxes with a polycoat lining on the inside of the packaging would be reported to this category.
Double-sided Polycoated Paperboard	**Definition**: Includes packaging made from paperboard that has a polyethylene (or other plastic) coating on both the outer and inner side of the packaging. **Examples**: Tubs and folding boxes used to package ice cream, cold drink paper cups provided at quick service restaurants to serve beverages. Paper takeout boxes with a polycoat lining on both the inside and the outside of the packaging would be reported to this category.
Paper Laminates	**Definition**: Includes laminated paper packaging where paper is the main component, along with either metalized foil/wax/plastic. The paper component represents the greatest percentage by weight. **Examples**: Fibre spiral wound containers (with plastic, aluminum, steel bottom and lid) for: frozen juice, chips, cookie dough, coffee, nuts, microwavable paper containers, wrappers, paper wrap packaging provided with food, such as sandwiches, burgers, or muffins, paper/plastic based wrapping paper and gift bags supplied as packaging at point of sale, pet food bags, laminated Kraft paper bags (filled at point of sale) and laminated Kraft paper packaging. Include any paper laminate packaging-like products supplied to consumers in this category.
Kraft Paper Carry-Out Bags	**Definition**: Non-laminated Kraft paper bags filled at point of sale or supplied to consumers as packaging-like products. **Examples**: Non-laminated grocery bags, prescription bags, non-laminated paper take-out bags used for mushrooms or food delivery.
Kraft Paper - Non-Laminated	**Definition**: Non-laminated Kraft paper packaging. **Examples**: Kraft paper packaging used for products such as flour, sugar, potatoes or oatmeal. Includes non-laminated Kraft paper used for mailing packages.
Corrugated Cardboard	**Definition**: Multi-layered paper board and fibre which may have one or more layers of corrugation. **Examples**: Electronic product boxes such as television and computer boxes, pizza boxes, boxes used for transport of e-commerce items to residential consumers. Includes corrugated moving boxes and banker boxes supplied to consumers as packaging-like products.
Boxboard and Other Paper Packaging	**Definition**: Single layered paperboard and fibre board with no corrugation and all types of moulded pulp packaging. Includes paper packaging not included in any other paper subcategories. Fibre-board containers made from other non-wood sources (e.g. bamboo, bagasse, eucalyptus). **Examples**: Paper board such as cereal, tissue and shoe boxes, moulded pulp paper packaging such as egg cartons, fibre pots and formed coffee take-out trays, stiff paperboard used to mount plastic blister packs (e.g., for toys and

	batteries), the roll inside of toilet paper, paper towel, tin foil and plastic wrap, tissue paper used as paper packaging for stuffing packaging, paper-based wrapping paper and gift bags supplied as packaging at point of sale or as packaging-like products, newsprint used as packaging material in shoe boxes and shipping boxes used for transport of e-commerce items to residential customers, clothing hang tags.
Clear PET Bottles, Jars and Jugs < 5 Litres	**Definition**: Transparent, light blue or light green #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of less than 5 litres of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code. **Examples**: Salad dressing bottles, peanut butter containers, edible oil bottles, dish soap or mouthwash bottles.
Clear PET Bottles, Jars and Jugs >= 5 Litres	**Definition**: Transparent, light blue or light green #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of 5 litres or more of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code. **Examples**: Salad dressing bottles, edible oil bottles.
Coloured PET Bottles, Jars and Jugs < 5 Litres	**Definition**: Coloured #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of less than 5 litres of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code. **Examples**: Salad dressing bottles, peanut butter containers, edible oil bottles, dish soap or mouthwash bottles.
Coloured PET Bottles, Jars and Jugs >= 5 Litres	**Definition**: Coloured #1 PET (Polyethylene Terephthalate) bottles, jars and jugs with a volume of 5 litres or more of a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program, displaying the #1 resin code. **Examples**: Salad dressing bottles, edible oil bottles.
Clear PET Thermoform Containers	**Definition**: PET thermoform clear, light green and light blue containers such as clamshells used for non-beverage products. **Examples**: Muffin or cake containers, salad containers, egg containers, trays.
Coloured PET Thermoform Containers	**Definition**: Coloured PET thermoform containers such as clamshells used for non-beverage products. **Examples**: Muffin or cake containers, salad containers, egg containers, trays.
Natural HDPE Bottles, Jars and Jugs < 5 Litres	**Definition**: Natural or translucent #2 HDPE (High Density Polyethylene) bottles, jars and jugs, with a volume less than 5 litres displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. **Examples**: Laundry detergent, shampoo, bleach, vinegar, corn syrup, body wash, household cleaning products, etc.
Natural HDPE Bottles, Jars and Jugs >= 5 Litres	**Definition**: Natural or translucent #2 HDPE (High Density Polyethylene) bottles, jars and jugs with a volume of 5 litres or more, displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program.

	Examples: Laundry detergent, bleach, cleaning supplies supplied in containers that are 5 litres or more.
Coloured HDPE Bottles, Jars and Jugs < 5 Litres	**Definition**: Coloured #2 HDPE (High Density Polyethylene) bottles, jars and jugs, with a volume less than 5 litres displaying the #2 resin code containing a non-beverage product, any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program and products other than oil or glycol included in the New Brunswick Oil and Glycol Product Stewardship Plan. **Examples**: Laundry detergent, shampoo, bleach, vinegar, corn syrup, body wash, household cleaning products, etc.
Coloured HDPE Bottles, Jars and Jugs >= 5 Litres	**Definition**: Coloured #2 HDPE (High Density Polyethylene) bottles, jars and jugs with a volume of 5 litres or more, displaying the #2 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. **Examples**: Laundry detergent, bleach, cleaning supplies.
Other Polyethylene (PE) Packaging < 5 Litres	**Definition**: Includes all other polyethylene rigid (non-foamed) packaging not reported above with a volume less than 5 litres displaying the #2 or #4 resin code containing a non-beverage product. Does not include laminated PE packaging tubes with non-PE barrier layers. **Examples**: #2 HDPE Pails and buckets (that are not bottles, jars or jugs) and lids used to package oils or other prepared foods and consumer goods. Includes #4 LDPE bottles.
Other Polyethylene (PE) Packaging >= 5 Litres	**Definition**: Includes all other polyethylene rigid (non-foamed) packaging not reported above with a volume of 5 litres or more displaying the #2 or #4 resin code containing a non-beverage product. Does not include laminated PE packaging tubes with non-PE barrier layers. **Examples**: #2 HDPE Pails and buckets (that are not bottles, jars or jugs) used to package oils or other prepared foods and consumer goods. Includes #4 LDPE bottles.
Polypropylene (PP) Packaging < 5 Litres	**Definition**: Includes all PP #5 rigid packaging and containers with a volume of < 5 litres displaying the #5 resin code containing a non-beverage product, any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program and products other than paint included in the New Brunswick Paint Stewardship Plan. **Examples:** Cosmetic products, such as creams and lotions, prescription pills, as well as microwaveable foods are commonly packaged in PP containers.
Polypropylene (PP) Packaging >= 5 Litres	**Definition**: Includes all PP #5 rigid packaging with a volume of 5 litres or more displaying the #5 resin code containing a non-beverage product, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. **Examples**: Cosmetic products, such as creams and lotions, prescription pills, as well as microwaveable foods are commonly packaged in PP containers.
Expanded/Extruded Polystyrene	**Definition**: All forms of expanded/extruded foam packaging used in food and protective packaging applications and may display resin code #6. **Examples**: Meat trays, beverage cups used as packaging, cushion packaging for consumer products and PS foam packing peanuts. Includes beverage

	cups, plates and other packaging-like-products made of expanded polystyrene supplied to consumers.
Rigid Polystyrene (PS)	**Definition**: All other non-expanded polystyrene packaging that is not included in the Expanded/Extruded Polystyrene category above. May display resin code #6. **Examples**: Polystyrene clear clamshell containers such as berry and muffin containers, opaque clamshell containers such as food take-out containers, yogurt containers, clear rigid trays, and packaging-like products such as beverage cups and plates, plastic hangers provided as packaging with an item of clothing.
PLA, PHA, PHB	**Definition**: Plastic containers consisting of bio-plastics made of either PLA (polylactic acid), PHA (polyhydroxyalkanoates) and PHB (poly-3-hydroxybutyrate) polymers for non-beverage products, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. **Examples**: PLA clamshell containers, PLA egg containers, peanut packaging.
All Other Rigid Plastic Packaging (not listed above) < 5 Litres	**Definition**: All forms of rigid or foamed plastic packaging and containers with a volume less than 5 litres, for non-beverage products, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program that are not included in any of the other plastic subcategories, including all #3 PVC packaging and Polyurethane (PU) foam packaging. Also includes non-coded plastics. **Examples**: Hand cream tubes, polyethylene foam sheets, inserts and moulds for packing appliances, some plastic blister packaging used to display toys, batteries or other products, and plastic hangers provided as packaging with an item of clothing.
All Other Rigid Plastic Packaging (not listed above) >= 5 Litres	**Definition**: All forms of rigid or foamed plastic packaging and containers with a volume of 5 litres or more, for non-beverage products, or any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program that are not included in any of the other plastic subcategories, including all #3 PVC packaging and Polyurethane (PU) foam packaging. Also includes non-coded plastics. **Examples**: Hand cream tubes, polyethylene foam sheets, inserts and moulds for packing appliances, some plastic blister packaging used to display toys, batteries or other products, and plastic hangers provided as packaging with an item of clothing.
LDPE/HDPE Film	**Definition**: Includes plastic film made from LDPE, LLDPE, HDPE (Low Density, Linear Low Density, High Density Polyethylene) or combinations thereof. May display resin code #4 or #2. PE films reported under this category must not contain any barrier layers or other non-PE resins. **Examples**: May include certain fresh and frozen vegetable bags, diaper packaging, bread bags, shrink wrap around products (e.g., around a tray of 24 water bottles), dry cleaner bags, soil and fertilizer bags, produce and bulk store bags provided to the residential consumer as service packaging, film used around newspapers, magazines and catalogues for protection. Includes LDPE/HDPE Film supplied to consumers as packaging-like products
LDPE/HDPE Film Carry-Out Bags	**Definition**: Includes #4 LDPE or #2 HDPE (Low Density/High Density Polyethylene) film carry-out bags provided at point of sale or supplied as

	packaging-like products. May display resin code #4 or #2. **Examples**: Plastic shopping bags with or without images or text.
Polypropylene (PP) Film	**Definition**: Includes plastic film made from PP. May display resin code #5. PP films reported under this category must not contain any barrier layers or other non-PP resins. **Examples**: May include certain fresh and frozen vegetable bags or overwrap, baked goods, and confectionary products.
PLA, PHA, PHB - Plastic Film	**Definition**: Plastic film consisting of bio-plastics made of either PLA (polylactic acid), PHA (polyhydroxyalkanoates) and/or PHB (poly-3 hydroxybutyrate) polymers. **Examples**: PLA, PHA, PHB shrink wrap around products, PLA, PHA, PHB bags for vegetables and salad, PLA, PHA, PHB film used around newspapers and magazines and catalogues for protection.
PLA, PHA, PHB Carry-Out bags	**Definition**: Plastic carry-out bags consisting of bio-plastics made of either PLA (polylactic acid), PHA (polyhydroxyalkanoates) and/or PHB (poly-3-hydroxybutyrate) polymers. **Examples**: Carry-out bags
Plastic Laminates and Other Flexible Plastic Packaging	**Definition**: All laminated film and laminated flexible plastic packaging comprised of multiple plastic resin types and/ or combinations of plastic resins and metalized foils, wax, and/or paper. This material category also includes mono material such as those made of PET, PVC, EVA and other films that do not meet the definition of LDPE/HDPE Film or PLA, PHA, PHB – Plastic film. **Examples**: May include candy wrappers, coffee pouches, chip bags, cheese wraps, cereal liner bags, shrink wrap, prepackaged deli meat pouches, yogurt stick packs, vacuum packaging, bubble wrap, stand up pouches, woven or non-woven plastic bags intended for more than one use when provided as packaging, net bags used for citrus fruits, nuts or cosmetic samples, plastic or plastic/foil based wrapping paper and gift bags supplied as packaging or packaging-like products at point of sale.
Steel Aerosol Containers	**Definition**: All aerosol containers that are more than 50% steel by weight containing products other than oil or glycol included in the New Brunswick Oil and Glycol Product Stewardship Plan and paints included in the New Brunswick Paint Stewardship Plan. **Examples**: Air freshener, deodorant and hairspray containers, food spray cans, wax and polish spray cans, insulating foam spray cans.
Other Steel Containers and Packaging	**Definition**: All other containers or packaging that are more than 50% steel by weight or other metal and are not included in another steel and other metal packaging subcategory. Includes any beverage product not bearing a deposit under the New Brunswick Beverage Containers Program. **Examples**: Steel food containers such as soup, lids and closures on packaging (closures for both beverage and non-beverage products), wire hangers when provided as packaging with an item of clothing, cookie tins, tea tins.
Aluminum Aerosol Containers	**Definition**: Includes aluminum aerosol containers that are at least 95% aluminum by weight.

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

5. Collections

In New Brunswick, the Regulation sets out the requirements for the Stewardship Plan to include information on the collection system included in the Stewardship Plan including:

Section 39:

- *a) information on the storage, collection, transportation, recycling, processing, disposal and other handling of designated material waste, including the designated material waste of other producers;*
- *c) Information on the province-wide collection system to be used by the consumer, including return facilities, by category of material;*
- *e) Information on service delivery to remote or rural areas*
- *g) a description of the manner in which existing collection and processing systems have been taken into account to maximize waste diversion in the province.*

Section 60:

- *(a) respecting the province-wide collection system to be included in a stewardship plan under paragraph 39(c), information on the provision of services to:*
  - *I. Single-unit dwellings,*
  - *II. Multi-unit dwellings*
  - *III. Schools, and*
  - *IV. Provincial or local government property that is not industrial, commercial or institutional property and*

Collection services will be provided to persons in New Brunswick who use designated material for personal, family or household purposes. These collection services include the provision of services to persons in First Nation communities where First Nation communities wish to receive the services.

Circular Materials approach to delivering collection services is to contract with collection service providers to provide collection services that meet Circular Materials collection requirements. Circular Materials will provide collection services to the following Eligible Sources[11] in New Brunswick.

Single-unit dwellings defined as a house, town home and other self-contained premises used by a person for residential purposes, seasonal dwelling, but does not include visitor accommodations.

Multi-unit dwellings defined as a building or part of a building in which residential accommodation is provided or made available and contains multiple self-contained residential units, including an apartment building and a condominium, but does not include visitor accommodations[12].

Schools defined as public, private, band-operated Schools, and alternative learning centers are all eligible to participate in the program.

Public Space defined as provincial or local government property that is not industrial, commercial or institutional property and does not include campgrounds.

[11] Includes Eligible Sources in Regional Service Commissions and First Nations
[12] University Residences are considered an Institutional Source and therefore would not be an eligible source

5.1. Collection System Design Principles

Circular Materials will adhere to the following collection and management system design principles:

1. **Curbside Services:** All Eligible Sources will receive curbside collection of PPP materials designated for curbside collection under the Stewardship Plan;
2. **Frequency of collection**: Eligible Sources that receive curbside collection will have curbside collection at a frequency suitable for the available storage space, provided receptacles, and operational efficiencies for Circular Materials. Circular Materials will review the current frequency of curbside collection services provided to Eligible Sources and make any necessary adjustments to maximize operational efficiencies. Most Single-unit dwellings in New Brunswick receive bi-weekly collection which is a reasonable collection frequency[13]. Collection frequency varies for Multi-unit dwellings and Schools based on many factors including occupancy, generation of PPP and storage space;
3. **Collection Containers:** Collection containers in use prior to launch of the stewardship program will be continued in the near term but may be changed over time to standardize collection service across the province;
4. **Unified collection list:** It is Circular Materials intention to develop a unified collection list of accepted materials, to be used for all residents in New Brunswick, which will align with the Designated Materials Guide;
5. **Non-PPP Items:** Items that are not designated materials will not be targeted for collection. Circular Materials will work with communities to reduce contamination over time.
6. **Comingled materials:** Where materials commingled in Single-unit dwellings, Multi-unit dwellings and School collection systems do not meet market specifications, the materials may be collected separately or may be shifted to depot collection to improve material quality;
7. **Depot Services:** For collection of PPP materials designated for collection through depots and not accepted in curbside collection systems:
    - Depots will be staffed to reduce contamination and ensure materials are from Eligible Sources;
    - Depots will be situated in communities that are commercial hubs to provide convenient access for urban and rural residents, to minimize extra trips to access the depot and to be within reasonable drive times.

Circular Materials developed a master services agreement (MSA) and a statement of work (SoW) to contract with Regional Service Commission (RSC), local municipalities, First Nations or private companies for curbside and depot collection services. These agreements set out collection service standards and type of packaging and paper to be accepted in the collection system to standardized services across the province. After full implementation of the Stewardship Plan including the implementation of new post-collection services as outlined in Section 6.3.1, all designated material listed in Section 4 will be accepted in the collection system.

During the development of the initial Stewardship Plan, RSCs, local municipality or service district (the "entity"), or First Nation were invited to execute a contract with Circular Materials to provide collection services to leverage the existing processes and infrastructure. This included collection services for Single-unit dwellings, Multi-unit dwellings, and Schools where RSCs, entities, or First Nations were already providing service. Where agreements were not executed with RSCs, entities,

13 All other provinces with EPR programs for PPP use bi-weekly collection as a reasonable collection frequency for curbside services to single-unit dwellings, either through direct regulatory requirements on producers or inclusion in their stewardship/program plans (where appropriate).

or First Nations, Circular Materials established agreements with the private sector or RSC through a competitive procurement process or through direct negotiations.

In advance of collection agreements reaching term, Circular Materials will work to extend existing agreements with service providers as possible, negotiate new agreements, or tender services through competitive procurement processes.

5.2. Residential Curbside Collection

Residential curbside collection is defined as the collection of designated materials from Single-unit dwellings and Multi-unit dwellings with each location typically separately setting out material for pickup by collection vehicles. Typically smaller Multi-unit buildings (e.g., less than five units) are included based on past practices by entities in establishing curbside collection programs (i.e., limiting the size of Multi-unit buildings).

Currently in New Brunswick, Circular Materials operates a residential curbside collection program for most First Nations and entities for PPP[14]. There are three types of collection systems including:

- single stream wheeled carts,
- single stream bags, and
- dual stream boxes.

Single stream refers to placing all PPP in the same wheeled cart or bag, while dual stream refers to source separating PPP into container and fibre streams.

Table 5.1 – Breakdown of Collection Systems for Residential Curbside Program

Collection System	% of Households
Wheeled Carts (Single Stream)	39%
Bags (Single Stream)	31%
Boxes (Dual Stream)	30%
TOTAL	**100%**

The collection frequency includes weekly, bi-weekly, and monthly cycles as summarized in the table below. The weekly service is for select locations on the dual stream box system with container and fibre streams alternating each week.

Table 5.2 – Breakdown of Collection Frequency for Residential Curbside Program

Collection	% of Households
Weekly (alternating)	7%
Bi-Weekly	75%
Monthly	18%
Total	**100%**

[14] At the time of preparing this Stewardship Plan, 14 out of 15 First Nation communities were receiving curbside collection service or in the process of transitioning. Additionally, 83 out of 89 entities were receiving curbside collection services with 6 transitioning (acknowledging that 3 of those entities currently receive partial service).

As part of implementing the Stewardship Plan, Circular Materials will continuously review the performance of the residential curbside collection program in terms of quantity and quality of material collected as well as based on any feedback gained directly from the public (e.g., customer service) or through promotion and education (P&E) initiatives. Improvements could include improving operational practices (e.g., Oops stickering program), P&E initiatives targeted to improve behaviour, or by making changes to the collection system or frequency. P&E is further discussed in Section 7.

5.3. Multi-Unit Dwellings and Schools Collection

Generally, Multi-unit dwellings and Schools are required to register with Circular Materials in order to receive collection services under the Stewardship Plan. As previously mentioned, some Multi-unit dwellings are serviced as part of the residential curbside program.

Circular Materials has established separate registries via its website for Multi-unit dwellings that are not serviced as part of the residential curbside program[15] and Schools[16]. As part of expanding the EPR program in 2025, Multi-unit dwellings and Schools can register to receive service:

- If located in Phase 1 Regions (Northwest, Restigouche, Fundy, Southwest, Capital, and Western Valley), the registration deadline was January 31, 2025 to receive service by May 1, 2025.
- If located in Phase 1 or Phase 2 Regions (Chaleur, Acadian Peninsula, Miramichi, Kent, Southeast, and Kings), the registration deadline was May 30, 2025 to receive service by November 1, 2025.

As part of implementing the Stewardship Plan, Circular Materials will continue to maintain registries to allow for Multi-unit dwellings and Schools to participate in the EPR program. This will ensure that any Multi-unit dwellings and Schools that do not register before the deadlines outlined above, maintain the ability to register and received services under the program. Circular Materials will promote the registry to its stakeholders on an ongoing basis and through outreach and engagement. At a minimum, two cadences will be established each year consisting of a deadline to register coinciding with a future service delivery start date, similar to the approach implemented in 2025.

Circular Materials works with existing service providers including private haulers, entities, and RSCs or through competitive tender processes to establish service agreements. Additionally select Multi-unit buildings or Schools may be added to the residential curbside program based on route efficiencies.

5.4. Depot Collection

Depot collection is defined as the collection of designated materials at a location operated by a collection service partner at which designated materials are received from residents. Any Single-unit dwelling, Multi-unit dwelling or School that does not receive curbside collection in the province will receive, at a minimum, depot collection of designated materials or select designated materials if they are not collected curbside. At the time of preparing this Stewardship Plan, all First Nations and entities, including Multi-unit dwellings and Schools, receiving service through the EPR program is based on curbside service for most designated materials.

Circular Materials has established a depot collection program for select designated materials including flexible plastics, white foam polystyrene, beverage cardboard, and glass packaging. Generally, most of these items (excluding beverage cardboard) are not accepted in the residential curbside program in New Brunswick. The depot collection program is generally operated through the Eastern Recycler's Association's network of redemption centres across New Brunswick.

[15] https://www.circularmaterials.ca/new-brunswick-multi-family-dwelling-recycling/
[16] https://www.circularmaterials.ca/nbschoolsregistry/

As part of implementing the Stewardship Plan, Circular Materials will continuously review the performance of depot collection programs in terms of quantity and quality of material collected as well as based on any feedback gained directly from the public (e.g., customer service) or through P&E initiatives. Improvements could include optimizing the depot locations including adding locations and P&E initiatives targeted to improve collection of materials. P&E is further discussed in Section 7.

5.5. Remote and Rural Areas

Circular Materials will support collection of designated materials in remote and rural areas through:

- Continued operation of curbside and depot collection programs including continuously reviewing performance as previously mentioned.
- Targeted P&E initiatives as further outlined in Section 7.

5.6. Public Space

Public Spaces include parks, waterfronts, sports fields, town squares that are on government property. Public Spaces do not include sidewalks, streets, campgrounds, or industrial, commercial or institutional property.

Typically the purpose of waste collection activities in Public Spaces is for litter mitigation. Challenges with collecting recyclable materials from Public Spaces are well known to be problematic due to presence of heavy contamination, liquids from beverages, food waste, and hazardous materials. Additionally Public Space collection containers are susceptible to impact from weather conditions, vandalism, and wildlife. Recycle BC has completed extensive work on a similar program related to streetscape recycling and has made similar findings[17].

To support the development of a Public Space collection program for New Brunswick, Circular Materials plans to implement a multi-phase approach consisting of engaging RSCs, entities, and First Nations; advancing a pilot program; and developing and submitting a Public Space Implementation Plan to Recycle NB for review and approval.

Engaging RSCs, Entities, and First Nations: In 2026, Circular Materials will develop a working group to engage key stakeholders on the Public Space program. Key outcomes will be to:

- Identify preliminary eligibility criteria for Public Space collection such as locations that currently receive garbage collection and are highly visited/used.
- Identify New Brunswick Public Spaces based on the eligibility criteria.
- Review current waste management practices in Public Spaces.
- Complete waste audits at select Public Spaces.
- Develop a pilot program, including identifying potential sites and working with key stakeholders to develop the pilot program.

Advancing Pilot Program: In 2027, CM will implement a pilot program for select Public Spaces working with key stakeholders. The purpose of the pilot program will be to:

- Evaluate the effectiveness of collecting PPP, including monitoring the weight and composition of collected material.
- Evaluate the effectiveness of collection containers and signage.
- Review operational considerations such as location/access to collection containers, seasonal impact, frequency of collection and health and safety.
- Evaluation of costs.

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[17] https://recyclebc.ca/wp-content/uploads/2020/07/Streetscape-Recycling_Consultation-Presentation-07.22.2020.pdf

Developing of Public Space Implementation Plan: In 2028, Circular Materials will develop and submit a Public Space Implementation Plan to Recycle NB for review and approval by March 31, 2028. The plan will summarize key findings from engagement activities with RSCs, entities, and First Nations and the pilot program. The plan will provide an overview of the full scale implementation of the Public Space collection program including outlining how RSCs, entities, and First Nations can participate in the program, timelines, Public Space eligibility criteria, and operational requirements.

Circular Materials will not deliver Public Space collection without an RSC, entity, or First Nation collection partner alongside the co-siting of recycling Public Space bins with garbage Public Space bins as this is critical to an effective recycling collection system. Additionally, Circular Materials does not own the Public Space property and can only deliver service through a partnership with an RSC, entity, or First Nation, subject to reasonable commercial terms.

6. Material Management

In New Brunswick, the Regulation sets out the requirements for the Stewardship Plan to include information on:

> *Section 39:*
>
> *d) the location of storage, recycling, processing, disposal and other handling facilities for designated materials,*
>
> *g) a description of the manner in which existing collection and processing systems have been taken into account to maximize waste diversion in the province;*
>
> *h) a management plan for designated material waste, by category of material, according to the following order of preference:*
>
> *I. reuse of the designated material;*
>
> *II. recycling or composting of the designated material;*
>
> *III. recovery of energy producers by the designated material; and*
>
> *IV. disposal of the designated material in accordance with the Act*
>
> *j) information on current and future research and development activities in the Province related to the management of designated materials.*
>
> *l) A management plan for designated material waste, by category of material, which shall provide for the implementation of environmental and human health and safety standards, which shall meet or exceed those provided by applicable law;*

As part of the implementation of initial Stewardship Plan, Circular Materials has established a post-collection system through utilizing existing public and private infrastructure consisting of receiving (transfer stations) and post-collection (material recovery) facilities. This has included establishing:

- Agreements with 5 receiving facilities and 5 pre-conditioning facilities to process collected materials.
- Transportation and processing agreements for materials collected from Depot collection programs.
- Marketing agreements to transport materials to recycling markets.

A summary of the receiving and pre-conditioning facilities used for the management of designated materials is included in Appendix B.

6.1. Material Management Design Principles

Circular Materials will adhere to the following principles whilst developing, implementing and managing the processing of designated Materials.

1. **Preferred material management option hierarchy:** Circular Materials will utilize a hierarchy of options for managing designated materials. We will endeavour to use the highest option in the hierarchy as is commercially reasonable and then move down to the next available options in descending order of preference. The hierarchy will be:

Preferred Management Options
Reuse
Recycled
Composted
Beneficial Reuse
Energy Recovery
Treatment (Landcover/Incineration)
Disposal

2. **Build an effective collection system:** Collected designated materials will be delivered to receiving and/or post collection facilities located within a reasonable drive time of the collection routes and depots and develop a standardized collection system that maximizes the amount of designated materials that can be managed through the highest possible option in the waste hierarchy where commercially viable.
3. **Use of existing infrastructure:** Existing post-collection operations utilize existing infrastructure owned by RSCs and the private sector. In advance of agreements expiring, new agreements will be negotiated, or services will be tendered through competitive procurement processes. It is anticipated with the establishment of a new post-collection facility or facilities, as further described in Section 6.3.1, changes will be made to the post collection system as some existing infrastructure may become redundant or need to be repurposed.
4. **Minimize contamination:** Detailed material audits are completed to characterize collected material, including non-designated materials (i.e., contamination), which is used to inform the effectiveness of collection systems and inform P&E initiatives (further described in Section 7).
5. **Field Assessments:** Circular Materials will conduct field assessments of existing receiving and pre-conditioning facilities to assess whether the facility can manage designated materials in a manner that supports the achievement of the goals within the Stewardship Plan and meets end-market requirements.

6.2. Designated Materials Processing

Circular Materials anticipates managing packaging and paper as follows:

Paper will be sorted to remove items that are not paper and to meet the grade specifications of the end markets with whom Circular Materials has agreements. Paper that is not marketable due to cross-contamination or that is not captured during processing will be directed to alternate fuel or to landfill.

Rigid plastics will be sorted to remove items that are not rigid plastics and sorted into categories of PET, HDPE and mixed #3 to #7 plastics to meet the grade specifications of the end markets with whom Circular Materials has agreements or into a single category of mixed rigid plastics that will be shipped to a downstream processor for further processing. Rigid plastic that is not captured during processing will be directed to alternate fuel or to landfill.

Flexible plastics will be sorted to remove items that are not flexible plastics and sorted into a single category of mixed flexible plastics with the intention to be shipped to a downstream processor for further processing. Flexible plastic that is not captured during processing or is not sent to a downstream processor will be directed to alternate fuel or to landfill.

Metal will be sorted to remove items that are not metal and sorted into steel and aluminum to meet the grade specifications of the end markets with whom Circular Materials has agreements. Metal that is not captured during processing will be directed to landfill.

Glass will be shipped to a downstream processor for further processing. Glass that is not captured during processing will be directed to landfill.

6.3. Development of Infrastructure and Services

6.3.1. REQUEST FOR PROPOSALS (RFP) FOR POST-COLLECTION SERVICES

Circular Materials issued an RFP for the post-collection services related to recyclable materials collected in New Brunswick and Nova Scotia in June 2024. The purpose of the RFP was to solicit proposals from regional service providers that would provide Circular Materials with the most effective recycling solutions for Atlantic Canada. These proposals were then evaluated based on their ability to maximize recovery, optimize transportation and meet regulatory requirements while ensuring cost containment on behalf of Producers.

The successful proponent will develop and operate a new, state-of-the-art pre-conditioning facility in Halifax, Nova Scotia. The proposal best met Circular Materials' objectives of building a modern, state-of-the-art facility equipped with the latest mechanical and optical sorting technologies. The new facility is scheduled to begin operations in early 2027.

Some of the key features include:

- Designed to handle over 100,000 tonnes per year and capable of processing materials from the different collection systems such as single and dual stream bags, single stream carts, and dual stream boxes.
- Sorting systems will be provided by an equipment manufacturer with over 5 decades of experience and installations at over 450 facilities worldwide. Equipment will include optical sorters with near-infrared (NIR) and AI-assisted recognition, ballistic separators, and precision air-handling systems.

In parallel to the new pre-conditioning facility, New Brunswick facilities will continue to play an important role in the system. Circular Materials is currently evaluating options for processing source-separated fibre materials collected from New Brunswick at one of the existing pre-conditioning facilities currently processing materials in the province. Furthermore, Circular Materials will continue to work with existing facilities in New Brunswick to provide transfer services for collected material long-term to coincide with the implementation of the new pre-conditioning facility.

7. Promotion and Education

In New Brunswick, the Regulation sets out the requirements for the Stewardship Plan to include information on:

> *Section 39:*
>
> *k) a communications plan to inform consumers about the stewardship plan, including*
> *I. Information concerning reasonable and free access to a manner of collection, and*
> *II. A plan for education and awareness*

Circular Materials will design and implement a promotion and education (P&E) program on behalf of producers that have entered into an agreement with Circular Materials to be their PRO. Circular Materials will provide P&E materials, at no costs, to the eligible sources that are to be serviced under the collection system in both French and English. The plan below outlines Circular Materials' P&E strategy, approach and tactics in New Brunswick. Circular Materials is committed to implementing P&E strategies that support education and increase recycling rates across New Brunswick to ensure more materials are collected, recycled and returned to producers for use as recycled content. Circular Materials will commit to following any promotion and education guidelines, that are approved by the RecycleNB Board and made publicly available.

7.1. Goals

Circular Materials' P&E objectives include the following:

Meet P&E requirements.

- Deliver a fully bilingual P&E program that meets municipal by-law requirements on language.
- Collaborate with the New Brunswick First Nations to meet their unique needs and honour the "nothing about us without us" principle.

Ensure a seamless transition for New Brunswick residents.

- Support and maintain, with plans to enhance, the P&E program residents received prior to program roll-out.

Increase recycling rates.

- Use education to increase participation and program awareness.
- Positively influence recycling behaviour.
- Reduce contamination.

7.2. Process

Circular Materials has a comprehensive process to ensure it delivers P&E that meets the regulation requirements and the needs of New Brunswick residents. Circular Materials will use various inputs (i.e., resident research, discovery meetings, audit data, etc.) to customize and strategically implement recycling-related P&E across New Brunswick while considering the unique characteristics of each region and the most effective communication channels.

7.2.1. RESIDENT RESEARCH

To enhance recycling engagement and participation, Circular Materials conducts regular research to assess public perceptions, behaviours, and barriers related to recycling. Focus groups with New

Brunswick residents provide valuable insights that inform the development of promotion and education (P&E) strategies, ensuring materials are clear, accessible, and motivating.

A variety of research methods are used to evaluate and refine outreach efforts. Omnibus surveys track year-over-year trends in awareness and recycling behaviours, while neuro testing offers a scientific approach to understanding how audiences engage with educational materials. By leveraging consumer insights, behavioral research, and creative testing, Circular Materials continuously optimizes its P&E approach, ensuring that recycling messages remain impactful, relevant, and effective.

7.2.2. OUTREACH AND ENGAGEMENT

Circular Materials continues to collaborate with First Nations communities, Regional Service Commissions (RSCs), and entities to support and enhance recycling education.

Ongoing engagement efforts with the New Brunswick First Nations communities and Tribal Councils ensure that P&E materials are tailored to community needs. Circular Materials also works closely with RSCs and entities through P&E agreements to support recycling calendars, waste apps, and localized outreach initiatives.

By providing customized educational materials and leveraging local communication channels, Circular Materials ensures residents receive clear, accessible recycling information that drives participation and program success.

7.2.3. AUDIT DATA

Circular Materials' audit team will collect information that will be used to identify themes and challenge areas to tailor specific P&E messaging on a local level. E.g. if audit data shows that a community has an increase of paper towels in their recycling, Circular Materials can implement a campaign focusing on paper towels in this community to support behaviour change and reduce contamination. Follow-up audit data will be used to determine the impact of the P&E program. For more information about how audits are conducted, please see section 6.1.4.

7.2.4. TAGLINE

Circular Materials continues to develop P&E with input and collaboration from New Brunswick's Regional Service Commissions, entities, and New Brunswick First Nations communities and Tribal Councils.

Where a region, entity or First Nation continues to manage their recycling program, Circular Materials will support P&E efforts and amplify recycling messaging.

Where Circular Materials manages a local recycling program, P&E will be led by Circular Materials and include its call-to-action tagline to influence resident barriers and tap into their motivation. The tagline is strategically used to educate residents on how to recycle and why it is important to recycle.

Preparation / what you need to do before your material goes into the recycling bin.

What you need to do when placing your material in the bin and at the curb.

Continuing the behaviour cycle, focusing on the 'why recycle' piece.

Opt-in entity P&E is led by the entity, and will not include this tagline, but instead include areas to include their own logo and call to action.

Circular Materials will strategically utilize various P&E tactics to meet its objectives and the need of New Brunswick residents. Tactics include, but are not limited to the following:

- Recycling guides and calendars
- Social media content
- Videos
- Media buys including ratio, television, print, out of home advertising etc.
- School programming
- Local events
- Website information
- Recycling app
- Customizable assets for communities to use on their channels
- Contests
- Oops stickers

7.2.5. MEASURING SUCCESS

Circular Materials will establish a benchmark measurement of program awareness, perceptions and reported behaviour against which to track and assess changes pertaining to performance.

Following this benchmark, audit data will determine the impact the P&E program is having on education and changing behavior. P&E will undergo continuous improvement and evolve to continue to effectively educate and influence behavior change.

8. Program Performance & Reporting

In New Brunswick, the Regulation sets out the requirements for the Stewardship Plan to include information on:

Section 39: *b) a description of categories of material to be used for the purposes of annual report and performance measures and targets;* *f) the geographic areas to be used for the purposes of the annual report;*

Furthermore, the regulation sets out the requirements for performance measures, targets and annual reporting:

Sections: *44(1) Each Producer that is subject to a stewardship plan to submit to the stewardship board for approval one or more performance measures and targets by category of material, that the producer will use to assess the effectiveness of the plan.* *45(1) On or before May 31 in each year, a producer shall submit an annual report to the stewardship board detailing the effectiveness of the stewardship plan during the previous calendar year*

8.1. Performance Measures and Targets

Circular Materials began operations in November 2023, per the initial Stewardship Plan, and has followed the phased roll out of services as detailed in Section 5.7. To date, the program has not been fully implemented across New Brunswick and therefore the available data on materials collected, which would be used to set performance measures, does not represent a full account of PPP managed in the province and only constitutes a 14-month period.

This presents a challenge to set performance targets under the Stewardship Plan as appropriate data is not available to analyze collection trends.

Circular Materials is committed to establishing and achieving ambitious but achievable performance targets, based upon the principle of continuous improvement once the program has been fully implemented. Only after the program has been fully implemented can meaningful performance targets be proposed and established.

Therefore, Circular Materials propose performance targets for the Stewardship Plan based upon the following principles:

1. Circular Materials will set a baseline for performance targets, as detailed below, calculated from the proportion of materials collected during the first full year of operations (2024)[18].
2. Circular Materials will commit to maintaining the baseline targets for the first two (2) full years of operations under the Stewardship Plan (2026-2027).

[18] For clarity, the baseline performance target is calculated as the tonnes stored (e.g., baled) and shipped to recycling markets in 2024, divided by normalized tonnes supplied to consumers by Circular Materials' subscribing producers in 2023 expressed as a percentage. For flexible plastics it is noted that there are data gaps in terms of characterizing collected materials and as a result a revised baseline may need to be established in the future in consultation with Recycle NB. Normalized tonnes supplied is calculated by producer supply data equalized over 12 equal periods (per month) multiplied by the percentage of households (single family and multi-family) serviced by the program during each month in 2024, as per the roll-our schedule.

3. Circular Materials will gather the appropriate data during this baseline period and set new targets for the final three years of the Stewardship Plans' operations (2028-2030).
    a. These new targets will be based on continuous improvement against the baseline.
    b. They will be provided to Recycle NB in the 2027 annual report, submitted by May 31, 2028.

The performance target for each category of material will be calculated[18] as tonnes shipped to recycling markets by Circular Materials divided by tonnes supplied to consumers by Circular Materials' subscribing producers expressed as a percentage.

The material types that will be used for performance measures and targets and annual reporting purposes are:

- Paper
- Rigid Plastic
- Flexible Plastic
- Metal
- Glass

The baseline performance target for each material is shown in the below table.

Material Type	Baseline Performance Target
Paper	62%
Rigid Plastic	20%
Flexible Plastic	4%
Metal	14%
Glass	19%

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

8.2. Annual Reporting

Circular Materials will submit an annual report containing the information required by the Regulation on the timeline specified in the Regulation.

To align with Circular Materials' Producer Services Agreement and operations in other jurisdictions, supply data used in each annual report will be from one year previous. For example, the 2025 annual report, submitted in 2026, will use 2024 producer supply data and 2025 materials shipped to recycling end markets.

8.3. Geographical Areas to be Utilized

Circular Materials will report by the 12 RSCs and by the province as a whole for the purposes of the annual report.

9. Dispute Resolution

In New Brunswick, the Regulation sets out the requirements for the Stewardship Plan to include information on:

> *Section 39:*
>
> *o) a dispute resolution process to deal with disputes between a producer and a service provider*

9.1. Dispute Resolution: Service Providers

If a Dispute arises between Circular Materials (representing its producers) and a contracted service provider, the party seeking resolution of the Dispute may initiate Dispute Resolution by way of the following steps.

Step 1: Notice of Concern

If a Dispute arises which the staff representatives of each party have been unable to resolve through discussion, the party wishing to initiate the Dispute Resolution procedures must notify the other party in writing in the manner set out in section 33.1(1) of the *New Brunswick Clean Environment Act*. The notification will summarize the nature of the Dispute, the key facts, and include any relevant documentation.

Step 2: Informal Discussion

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

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

Step 3: Management Discussion

If the Dispute remains unresolved following the Informal Discussion, one of the parties may, within 30 days of the completion of the Informal Discussion, notify the other party in writing in the manner set out in section 33.1(1) of the *New Brunswick Clean Environment Act* summarizing the aspects of the Dispute which remain outstanding following the Informal Discussion.

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

Step 4: Arbitration

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

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

9.2. Dispute Resolution: Producers

A Dispute Resolution process between Circular Materials and its member Producers is outlined within the brand owners' agreement with Circular Materials. All Producers registered with Circular Materials can initiate the dispute resolution process as per the policy.

10. Elimination or Reduction of Environmental Impacts

In New Brunswick, the Regulation sets out the requirements for the Stewardship Plan to include information on:

Section 39: *i) a description of the efforts being made by the producer to redesign designated materials to improve opportunities for reuse and recycling;* *m) a plan for the elimination or reduction of the environmental impacts of designated material waste, by category of material;* *n) a description of greenhouse gas emissions resulting from the implementation of the stewardship plan and opportunities to reduce environmental impact;*

10.1. Efforts to Reduce and Improve Reusability and Recyclability

By extending producer responsibility to end-of-life management, EPR policies link the costs of collecting and managing products and packaging to those supplying the products and packaging in the form of producer fees. These price signals encourage producers to consider how to meet recycling targets for materials such as paper, rigid plastics, flexible plastics, metal and glass by improving recyclability or alternatively employing reuse strategies.

As producer fees are weight-based and are levied on a cent per kilogram supplied, there is an inherent incentive to reduce the weight of packaging and paper used to package products supplied to consumers in New Brunswick. While producers have an economic incentive to lightweight packaging, the protection and preservation of the products and services they supply should never be compromised, as the environmental impacts associated with damaged or spoiled goods will outweigh any benefits associated with a reduction in the use of packaging through lightweighting efforts.

Paper

The digitalization of communication and advertising has led to a reduction in the quantity of printed paper that is supplied to consumers in New Brunswick, a trend that is expected to continue in the coming years. Paper packaging, especially corrugated boxes for the use in the delivery of goods to consumers purchased through on-line sales or ecommerce has been steadily increasing. Fortunately, corrugated boxes and most other paper packaging formats are widely recyclable, recover at high rates and enjoy relatively stable commodity values. Companies in this space have made efforts to reduce the quantity of paper packaging used per shipment.

Most paper packaging, including corrugated boxes and boxboard boxes produced at Canadian paper mills is made from 100% recycled content from paper and packaging collected from post-consumer sources including factories, supermarkets and the residential blue box recycling programs across the country.[19] With the average number of times that paper packaging can be recycled ranging between seven and 25 times, the use of paper packaging to package and deliver products to consumers is a successful example of the circular economy in practice.

Rigid Plastic and Flexible Plastic

Many of the Circular Materials founding producers are party to the Consumer Goods Forum "Golden Design Rules" (see Appendix C) of which the latest iteration focuses on "eliminating unnecessary plastic packaging, by reducing headspace and plastic overwraps, as well as increasing recycling

[19] https://ppec-paper.com/

value in various types of plastic, including PET thermoformed packaging, flexible consumer packaging and rigid HDPE and PP.[20]

Many other Circular Materials subscribing producers are signatories to the Canada Plastic Pact (CPP)[21] and have committed to take steps to ensure that by 2025, 100% of the plastic packaging they use will be either reusable, recyclable or compostable. In addition, these companies have committed to take ambitious actions to ensure that at minimum 50% of plastic packaging supplied is effectively recycled or composted and contain on average 30% recycled content (by weight). Signatories to the CPP have committed to defining a list of problematic or unnecessary plastic packaging and taking steps to eliminating their use in their packaging portfolios.

Metal

Most metal packaging used for the containment of food and other consumer products is designed for recycling and poses no recyclability issues for downstream recycling in steel mills and aluminum smelters. In the past 20 years, the weight of steel cans has been reduced by 33%[22] through lightweighting efforts. Lighter cans positively impact the environment by reducing the amounts of raw materials and energy required to produce them, and ultimately reduces the total quantities generated. Metal packaging can be infinitely recycled and much of the metal packaging used to package products contains a high proportion of recycled content. For example, steel food cans have recycled content of up to 35% with technology currently used to make steel tinplate.[23]

Additionally, several Circular Materials founding producers are party to Loop – a global reuse platform that is currently piloting several packaging reuse programs for food and consumer products[24]. Stainless steel reuseable containers feature prominently among the portfolio of reuse options available and in many cases have replaced single-use paper or plastic packaging formats.

Glass

Glass bottles and jars used to package food and in some cases consumer products are for the most part already designed for recyclability. Glass is 100% recyclable and can be recycled endlessly without loss in quality. One of the leading manufacturers of container glass in North America uses on average 38% recycled glass in new glass bottles and jars and has a goal to increase recycled content to a 50% average by 2030.[25]

Similar to other materials, glass bottles and jars have been lightweighted by approximately 40% over the past 30 years, resulting in significant reduction in the per unit weight of glass containers supplied to the market.

Other Considerations

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

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

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[20] Reducing the Complexity of the Recycling Process & Increasing Recycling Rates. Consumer Goods Forum 2021.

[21] https://plasticspact.ca/

[22] https://worldsteel.org/steel-topics/steel-markets/steel-packaging/

[23] Can Manufacturers Institute

[24] Designed for reuse. Loop 2022.

[25] O-I Glass Sets Recycled Content Goal to Average 50 Percent by 2030

As per the PRO Emergency Reporting Clause, should Circular Materials discover an environmental emergency, Circular Materials will immediately notify, whether during normal business hours or after hours, Recycle NB and the appropriate location of the New Brunswick Department of Environment.

10.2. Greenhouse Gas Emission Impacts

Greenhouse gas emissions related to packaging and paper are generated throughout processes to extract raw materials (e.g. natural gas, wood, silica, bauxite etc.) through to the production of materials (respectively polymers, paper, glass, aluminum etc.) and to the formation of packaging and paper products.

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

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

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

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

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

Based on the US EPA's Waste Reduction Model (WARM)[26], the associated avoided GHG emissions from recycling one ton (0.91 tonne) of paper, rigid and flexible plastic, metal and glass is presented below. The total GHG emissions associated with the production and recycling of one ton (0.91 tonne) of these materials are compared to the emissions associated with the production and landfilling of them. In all cases, the landfilling of these materials results in at least twice - and as much as five times - the total GHG emissions (associated with the production and end-of-life pathway), when compared to recycling. This clearly demonstrates the climate benefits of recycling compared with landfilling.

Paper

Recycling one ton (0.91 tonne) of mixed paper results in avoided GHG emissions (reductions) of -3.55 $MTCO_2E$. As the GHG emissions associated with the production of mixed paper is approximately 6.07 $MTCO_2E$, the total emissions attributed to the production and recycling of one ton (0.91 tonnes)

[26] https://www.epa.gov/warm

of mixed paper is 2.52 $MTCO_2E$. Alternatively, landfilling one ton (0.91 tonne) of mixed paper is expected to result in 0.07 $MTCO_2E$, with the total emissions of production and landfilling expected to be 6.14 $MTCO_2E$. Given this, landfilling one ton (0.91 tonne) of mixed paper compared with recycling it, results in 2.4 times more total GHG emissions, when considering both the production and end-of-life scenario.

Rigid and Flexible Plastic

Recycling one ton (0.91 tonne) of mixed plastics results in avoided GHG emissions (reductions) of – 0.93 $MTCO_2E$. As the GHG emissions associated with the production of mixed plastic is approximately 1.87 $MTCO_2E$, the total emissions attributed to the production and recycling of one ton (0.91 tonne) of mixed plastic is 0.94 $MTCO_2E$. Alternatively, landfilling one ton (0.91 tonne) of mixed plastic is expected to result in 0.02 $MTCO_2E$, with the total emissions of production and landfilling expected to be 1.89 $MTCO_2E$. Given this, landfilling one ton (0.91 tonne) of mixed plastic compared with recycling it, results in two times more total GHG emissions, when considering both the production and end-of-life scenario.

Mixed Metal

Recycling one ton (0.91 tonne) of mixed metal results in avoided GHG emissions (reductions) of – 4.39 $MTCO_2E$. As the GHG emissions associated with the production of mixed metal is approximately 3.65 $MTCO_2E$, the total emissions attributed to the production and recycling of 1 ton (0.91 tonne) of mixed metal is -0.74 $MTCO_2E$. Alternatively, landfilling one ton (0.91 tonne) of mixed metal is expected to result in 0.02 $MTCO_2E$, with the total emissions of production and landfilling expected to be 3.67 $MTCO_2E$. Given this, landfilling one ton (0.91 tonne) of mixed metal compared with recycling it, results in approximately 4.5 times more total GHG emissions, when considering both the production and end-of-life scenario.

Glass

Recycling one ton (0.91 tonne) of glass results in avoided GHG emissions (reductions) of – 0.28 $MTCO_2E$. As the GHG emissions associated with the production of glass is approximately 0.53 $MTCO_2E$ the total emissions attributed to the production and recycling of one ton (0.91 tonne) of glass is 0.25 $MTCO_2E$. Alternatively, landfilling one ton (0.91 tonne) of glass is expected to result in 0.02 $MTCO_2E$, with the total emissions of production and landfilling expected to be 0.55 $MTCO_2E$. Given this, landfilling one ton (0.91 tonne) of glass compared with recycling it, results in approximately 2.2 times more total GHG emissions.

10.3. Plan for Elimination or Reduction of Environmental Impacts

An EPR-based system for the collection and management of packaging and paper is primarily focused on the supply-chain to maximize environmental outcomes associated with the recycling of materials that comprise packaging and paper. However, an additional feature of an EPR-based system is the ability to inform producers of the performance of their packaging choices within the recycling system.

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

Producers then can decide to reduce such cost by working with Circular Materials to ensure its collection and management system makes the requisite investments in collection, sorting and recycling innovation that leads to higher recycling rates and lower costs over time or by redesigning their packaging to facilitate collection, sorting and recycling[27]. (See also earlier discussion in section

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

10.1 Efforts to Reduce and Improve Reusability and Recyclability). Often both strategies are required in parallel.

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

With respect to the elimination or reduction of environmental impacts associated with the end-of-life management of packaging and paper in New Brunswick, efforts by Circular Materials will primarily focus on reducing the quantity of these materials that are currently sent to landfill and instead directing this material to recycling end markets wherever possible. Since the implementation of the initial Stewardship Plan, improvements have been made including:

- Improved access to recycling curbside collection programs for New Brunswick communities.
- Improved access to recycling curbside collection program for the Multi-unit dwelling and school sectors.
- Expanded list of accepted materials in the collection system, including the establishment of a depot collection program for select designated materials including flexible plastics, white foam polystyrene, and glass packaging.

With GHG emissions associated with landfilling packaging and paper versus recycling being two to five times greater, providing new recycling options for consumers has the potential to greatly reduce the environmental impacts associated with landfilling these materials.

Paper
In New Brunswick not all consumers have access to recycling for polycoated paperboard items, including but not limited to hot and cold paper beverage cups, ice cream tubs, spiral wound containers and aseptic containers, as these materials were not always -accepted in the municipal collection programs operating prior to EPR. After full implementation of the Stewardship Plan and the deployment of new post-collection services , Circular Materials will include the collection of these items within its list of accepted packaging and paper.

Rigid and Flexible Plastic
Before implementation of EPR for PPP in New Brunswick, not all rigid and flexible plastic packaging formats were accepted in the recycling system.. In particular, only a limited number of programs accepted polystyrene (PS) and expanded polystyrene (EPS) packaging formats. With respect to flexible plastic packaging formats, less than half of the population had access to collection systems for LDPE/HDPE film bags and overwrap in 2021. Now, under the Stewardship Program, all types of rigid and flexible plastic packaging are accepted, either through curbside programs or depot programs.

Metal
Steel and aluminum aerosol cans were not widely collected in New Brunswick, prior to implementation of EPR for PPP. Providing all residents with access to recycling for all metal packaging has the potential to significantly reduce the environmental impacts associated with the landfilling of these materials, as the GHG emissions associated are 5 times greater than that associated with recycling when considering avoided emissions. After full implementation of the Stewardship Plan and the deployment of new post-collection services, these materials will be accepted into the collection system under the Stewardship Plan, providing an alternative to disposal.

Glass

Before implementation of EPR for PPP in New Brunswick, most of the New Brunswick population did not have access to the collection and recycling of glass bottles and jars. Now, under the Stewardship Program New Brunswick residents can access collection services through the network of redemption centres across the province. This which has the potential to divert collected materials from disposal in landfills to recycling end markets.

Other Considerations

As per the PRO Emergency Reporting Clause, should Circular Materials discover an environmental emergency, Circular Materials will immediately notify, whether during normal business hours or after hours, Recycle NB and the appropriate location of the New Brunswick Department of Environment.

11. Appendix A – Producers on Whose Behalf the Plan is Submitted

3M Canada Company

A&W Food Services of Canada, Inc.

A. Lassonde Inc.

AA Pharma Inc.

Abbott Diabetes Care

Abbott Laboratories Co. Nutrition Division

AbbVie Corporation

ACCO Brands Canada LP dba HILROY

Acer America Corporation

Aeroplan Inc.

AGF Management Limited

Agropur Cooperative

Air Canada

Alcon Canada Inc.

ALIMENTS OUIMET-CORDON BLEU INC

Alliance Mercantile Inc.

Al-Pack Enterprises Ltd.

Amazon.com.ca, Inc.

Anchor Hocking Canada Inc

Anderson Watts Ltd.

Aphria Inc.

Apotex Inc.

Apple Canada Inc.

Arbonne International Distribution

Ardene Holdings Inc.

Aritzia LP

Ascensia Diabetes Care Canada Inc.

ASSA ABLOY Canada Residential Limited

Associated National Brokerage Inc.

Assured Natural Distribution, Inc.

AstraZeneca Canada Inc.

Auxly Cannabis Group Inc.

Avery Products (Canada) CCL Industries Inc

B & G Foods Canada, ULC

Bank of Montreal

Bank of Nova Scotia

Barilla Canada Inc

Bass Pro Shops Canada ULC

Bath & Body Works (Canada) Corp.

Bausch + Lomb Corporation

Bausch Health, Canada Inc.

Bayer Inc.

Beauty Systems Group (Canada) Inc

Behr Process Canada Ltd

Beiersdorf Canada Inc.

Bell Cheese Canada Inc.

Bell Marketing

Bell Mobility

Bellisio Foods Canada Corp.

Bento Inc.

Berry Global

Best Buy Canada Ltd.

BGP Pharma ULC

Bioforce Canada Inc.

BK Canada Service ULC

Blanco Canada Inc.

Blistex Ltd.

BMW Canad Inc.

Boathouse Row Hamilton Inc

Body Plus Nutritional Products Inc.

Bonte Foods Ltd

Boshart Industries Inc

Bothwell Cheese Inc.

Brother Intl Corp (Canada) Ltee

BSH Home Appliances Ltd.

Bulk Barn Foods Limited

C.B. Powell Limited

Cabela's Retail Canada ULC

Campbells Company of Canada

Canada Bread Company, Limited

Canada Dry Mott's Inc.

Canadian Tire Corporation Limited

Cannabis NB

Canon Canada Inc

Canopy Growth Corporation

Capital One Bank (Canada Branch)

Card Health Care

Cargill Limited

Carlton Cards Limited

Castlegate Logistics Canada Inc.

Cavendish Farms Corporation

CertainTeed Canada Inc.

CEVA ANIMAL HEALTH

Champion Petfoods Holding Inc

CHARLES KOMAR & SONS CANADA ULC

Charm Jewelry Limited

Church & Dwight Canada

CIBC Head Office

Cimpress Windsor Corp.

Cineplex Entertainment Limited Partnership

Citadelle Coopérative de producteurs de sirop d'érable

CKF Inc.

Claire's Stores Canada Corp.

Clean Life Sciences, Inc.

Clover Leaf Seafoods Corp.

Coca-Cola Canada Bottling Limited

Colgate-Palmolive Canada Inc.

Conagra Brands Canada Inc.

Conair Consumer Products Inc

Concord Premium Meats Ltd.

Confiserie Mondoux Inc

Conglom Inc.

Co-Operators

Costco Wholesale Canada Ltd.

Couche-Tard

Crayola Canada

Crosby Molasses Company Ltd.

Dairy Queen Canada, Inc.

Danby Products Limited

Danone Inc.

DAP Canada Division,RPM Canada,a General Partnership

Dare Foods Limited

Dart Canada Inc.

David Chapman's Ice Cream Limited

DAVIDsTEA Inc.

Dechra Veterinary Products Inc

Dell Canada Inc.

Delonghi Group

Deoleo Canada Ltd.

Dole Foods of Canada Company

Dollarama L.P.

Domino's Pizza Canadian Distribution ULC

Domtar Inc.

Dr Oetker Canada Ltd.

Dynamic Paint Products Inc.

Dyson Canada Limited

e.l.f Beauty Canada, Inc

Eddie Bauer of Canada Corporation

Edgewell Personal Care Canada ULC

Electrolux Major Appliances Canada

Eli Lilly Canada Inc.

Elizabeth Arden (Canada) Ltd

EMBECTA CANADA CO

Endy Canada Inc

Energizer Canada Inc

EssilorLuxottica Canada Inc.

Estee Lauder Cosmetics Ltd

Familiprix Inc.

Farm Credit Canada

FCA Canada Inc.

Fellowes Canada Limited

Ferrero Canada Limited

Ferring Inc.

FGF Brands

Firehouse Subs of Canada Ltd.

Foodtastic Inc

Foot Locker Canada co

Ford Motor Company

Freud Canada, Inc.

FREUDENBERG HOUSEHOLD PRODUCTS

Furlani Foods Coporation

Galderma

Gap Canada

Garant GP

Garmin International Inc

Gay Lea Foods Co-Operative Limited

GCO Canada ULC

GDE Grocery Delivery E-Services Canada, Inc.

General Mills Canada Corporation

General Motors of Canada Company

Gentec International

Giant Tiger Stores Limited

Give and Go Prepared Foods Corp

GlaxoSmithKline Consumer Healthcare ULC

Golf Town Limited

Goodmorning.com

Google Canada

Gorilla Glue

GRAFTON APPAREL LTD

Great Canadian Dollar Store (1993)

Grinner's Food Systems Limited

Groupe Dynamite Inc.

Groupe Marcelle Inc.

Groupe Seb

H&M Hennes & Mauritz Inc

Hain Celestial Canada ULC

Hallmark Canada (William E. Coutts Company, Limited)

Hartz Canada Inc.

Harvest Meats (Div of Premium Brand)

Hasbro Canada Corporation

Hawthorne Canada Limited

Helen of Troy Inc

Henkel Canada Corporation

Hershey Canada Incorporated (HCI)

Hexo Operations Inc.

HFC Prestige International Canada Inc.

High Park Holdings Ltd.

Hill's Pet Nutrition Canada Inc.

HOFFMANN-LA ROCHE LIMITED

Home Depot of Canada Inc.

Home Hardware Stores Limited

Honda Canada Inc

HP Canada Co.

Ideal Security Inc.

IFC Seafood Inc.

IKEA Canada Ltd Partnership

IKO Industries Ltd.

Imperial Tobacco Canada Limited

Indigo Books & Music Inc.

Inno Foods Inc

Intertape Polymer Inc.

Intervet Canada Corp.

Irving Consumer Products Limited

Irving Oil Ltd.

ITW Canada Inc.

Jamieson Wellness Inc.

Janssen Inc

John Deere Canada ULC

Johnson & Johnson (Canada) inc.

Johnson & Johnson VisionCare, Inc.

JTI-Macdonald Corp

KAO Canada Inc. (Jergens Canada Inc.)

Kaz Canada Inc.

Kellanova Canada Inc

Kent Building Supplies

Kentucky Fried Chicken Canada Co

Keurig Canada Inc.

Kia Canada Inc.

Kicking Horse Coffee Co. Ltd.

Kimberly-Clark Canada Inc.

KIND Healthy Snacks ULC

Kissner Milling Company

Kleen-Flo Tumbler Industries Limited

Knights Therapeutics Inc.

Kraft Heinz Canada ULC

Kruger Products Inc.

La Cie McCormick Canada Co.

Labatt Breweries of Canada

Lactalis Canada Inc.

Lantic Inc

LE GROUPE INTERSAND CANADA INC

Leda Health Innovations Inc.

Lego Canada Inc.

Lenovo (Canada) Inc.

Leon's Furniture Limited

Les Rôtisseries St-Hubert Ltée

Lexmark Canada Incorporated

LG Electronics Canada, Inc.

LifeScan Canada ULC

Lindt & Sprungli (Canada) Inc.

Little Caesar Enterprises, Inc

Loblaws Inc.

L'Oreal Canada Inc.

Louis Vuitton Canada

Lululemon Athletica Canada Inc.

Lundbeck Canada Inc.

Lush Handmade Cosmetics Ltd.

Lutron Electronics Canada Inc.

M&M Meat Shops Ltd.

Maple Leaf Foods Inc.

Mark Anthony Group Inc.

Mars Canada, Inc.

Mary Brown's Inc.

Mary Kay Cosmetics Ltd.

Masco Canada Ltd.

Mastronardi Produce Ltd

Mattel Canada Inc

MAV Beauty Canada, Inc.

MC Commercial Inc.

McCain Foods Canada

McDonald's Restaurants of Canada Limited

McKesson Canada Corporation

Mead Johnson Nutrition (Canada) Co.

Meilleures Marques Ltée

Merck Canada Inc.

Metagenics Canada Inc.

METRO BRANDS, G.P.

Michaels Stores, Inc.

Microsoft Canada Inc.

Mint Pharmaceuticals Inc.

Miss Mary Maxim Ltd

Molson Coors Canada

Mondelez Canada Inc.

Mondetta Canada Inc.

Moosehead Breweries Limited

Mother Parker's Tea and Coffee Inc.

Mrs. Dunster's (1996) Inc.

MTY Franchising Inc.

Mylan Pharmaceuticals ULC

National Smokeless Tobacco Co. Ltd.

Natural Factors Nutritional

Nature's Path Food Inc.

NaturSource Inc.

Nemcor Inc.

Nestle Canada Inc.

New Brunswick Liquor Corporation

Newell Brands Canada ULC

NIKE Canada Corp.

Nissan Canada Inc.

Nortera Foods Inc.

Northbridge Financial Corporation

Northland Properties Corporation

Novartis Pharmaceuticals Canada

Oatey Canada Supply Chain Services Co

Ocean Brands

Ocean Spray International, Inc.

Old Dutch Foods LTD

Olymel L.P.

Omron Healthcare Canada

Ontario Tender Fruit Growers

OrganiGram Inc.

Organika Health Products Inc

Organon Canada Inc.

P&H Milling Group

Pan American Nursery Products Inc

Panasonic Canada Inc.

Parts Canada Development Co.

PepsiCo Canada ULC

Perfetti Van Melle Canada Ltd.

Pet Valu Canada Inc.

PETM Canada Corporation

PH Canada Company (Pizza Hut)

Pharmasave Drugs (National) Ltd.

Popeyes Louisiana Kitchen

Post Foods Canada Inc.

PPG Architectural Coatings Canada

Premier Tech Home & Garden Inc.

Princess Auto Ltd.

Procter & Gamble Inc.

Puresource Corporation

RB Health (Canada) Inc.

RBC Financial Group

Re/Max Ontario-Atlantic Canada, Inc.

Recipe Unlimited Corporation

Reckitt Benckiser (Canada) Inc.

Recochem Inc.

Red Apple Stores Inc.

Red Bull Canada Ltd.

Regal Confections Inc.

Reinhart Foods Limited

Revlon Canada Inc.

Reynolds Consumer Products Canada Inc

RICHARDSON OILSEED EASTERN CANADA LIMITED

Richelieu Hardware Ltd.

Ricola Canada Inc

Riverside Natural Foods Ltd

Riviana Foods Canada Corp

Robert Bosch Inc.

Roche Diabetes Care Div of Hoffmann-La Roche Ltd

Rogers Communications Canada Inc

Rona Inc.

Roots Canada Ltd.

Rothmans, Benson & Hedges Inc.

Royal Canin Canada Company

Rust-Oleum Consumer Brands Canada

RW Consumer Products Ltd.

S.C.Johnson & Son Ltd.

S.H. Krikorian & Co Ltd.

Samsung Electronics Canada Inc.

Sandoz Canada Inc.

Sanofi Consumer Health

Sanofi-Aventis Inc.

Saputo Inc.

Scentsy Canada Enterprises, ULC

Scholastic Canada Ltd

Scotts Canada Limited

Sealy Canada Limited

Sephora Beauty Canada

Sharp Electronics of Canada Ltd.

Sherwin-Williams Canada Inc.

Shoppers Drug Mart Inc.

Siwin Foods Ltd

Skilcor Food Products Ltd.

Skyworth USA Corporation

Sleeman Breweries Ltd.

Sleep Country Canada Inc.

Smucker Foods of Canada Corp.

Sobeys Capital Incorporated

Sodastream Canada

Sofina Foods Inc

SoftMoc Inc.

Solutions 2 Go

Sonos Incorporated

Sony Electronics Inc.

Sony Interactive Entertainment LLC

Soprema Canada Inc.

Sources Coulombe Inc.

Southwire Company LLC

Spin Master Ltd.

Sprague Foods Limited

Stanley Black & Decker Canada Corporation

Staples Canada ULC

Starbucks Coffee Canada, Inc.

STIHL Limited

Structube Ltd

Subaru Canada, Inc.

Subway Franchise Systems of Canada

Sunstar Americas Inc

Suzuki Canada Inc.

Suzy Shier Inc.

Sysco Canada Inc.

T.S Simms and Co. Ltd

Targus Canada Ltd

Tata Consumer Products Canada Inc.

Taylor Fresh Foods Canada ULC

TB Canada Company

TD Synnex Canada ULC

Telus Mobility

TEMPUR CANADA LTD.

Teva Canada Limited

The Brick Warehouse LP

The Canada Life Assurance Company

The Clorox Company of Canada

The Cora Franchise Group Inc.

The Dominion of Canada General Insurance

The Empire Life Insurance Company

The Genuine Canadian Corp

The Jean Coutu Group (PJC) Inc.

The Little Potato Company

The Meat Factory Limited

The Minute Maid Company Canada Inc.

The Pampered Chef Canada Corp.

The Pepsi Bottling Group (Canada) ULC

The Sherwin-Williams Company

The Source

THE TORONTO-DOMINION BANK

The Vita Coco Company, Inc

Thomas, Large & Singer Inc.

Thriftys Inc (2005)

THS FOODS CANADA, LTD

Tim Hortons Advertising and Promo Fund (Canada) Inc.

Timex Group Canada

Toast Canada Inc

Tommy Bahama Canada ULC

Touram Limited Partnership dba Air Canada Vacations

Toyota Canada Inc.

Toys 'R' Us Canada Ltd.

Tree of Life Canada

Triton Water Canada Holdings Inc.

Tropicana Beverages Canada ULC

True North Salmon Limited Partnership

TVA Publications Inc

UAP Inc.

Uline Canada Corporation

Under Armour Canada ULC

UNFI Canada Inc

Unilever Canada Inc.

Uni-Select Canada Inc.

Upfield Canada Inc.

USP Canada Inc.

Value Village Stores

VegPro International Inc

Versuni Canada Inc.

VF Outdoor Canada, Co.

Virbac Corporation

Vita Health Products Inc.

Voortman Cookies Limited

W.T. Lynch Foods Limited

Wakefield Canada Inc.

Wal-Mart Canada Corp.

Water Pik Inc

Wawanesa Insurance

Wendy's Restaurants of Canada, Inc.

Westmorland Fisheries

Whirlpool Canada LP

Windsor Salt Ltd.

Winix Holdings Canada Inc.

Winland Foods Canada Inc

Winners Merchants International L.P.

WK Kellogg Canada Corp.

WN Pharmaceuticals Ltd

Wolf Steel Limited

Wonder Brands Inc.

YM Inc (Sales)

Zoetis Canada Inc

12. Appendix B: location of storage, recycling, processing, disposal and other handling facilities for designated materials

Receiving Facilities for Curbside Collections		
RSC	**Name**	**Address**
#1-Northwest	Northwest Regional Service Commission Transfer Station	248 Chemin Clément Roy Rivière-Verte, NB E7C 2W7
#2-Restigouche	Restigouche Transfer Station	7 Centennial Drive Campbellton NB E3N 3G1
#3-Chaleur	The Red Pine Solid Waste Management	1300 Route 360 Allardville, NB E8L 1H5
#8 Kings	Sussex Transfer Station	54 McLeod Drive Sussex, NB E4E 2P5
#10-Southwest	Hemlock Knoll Solid Waste Facility	5749 Route 3 Lawrence Station, NB E5A 3B9

Pre-Conditioning Facilities		
RSC	**Name**	**Address**
#4-Acadian Peninsula	Acadian Peninsula Recycling Centre	2650 Rue de L'Entreprise Tracadie-Sheila, NB E1X 1A1
#7-Southeast	Eco360 Waste Management Facility	100 Enviro Drive Berry Mills, NB E1G 5X5
#9 - Fundy	Fundy Region Solid Waste	10 Crane Mountain Road Saint John, NB E2M 7T8
#11- Capital	Fredericton Region Solid Waste	1775 Alison Blvd. Fredericton, NB E3B 4Y2
#12-Western Valley	J.S. Bellis Ltd.	147 Moffatt Street Woodstock NB E7M 2H5

13. Appendix C: Golden Design Rules

GOLDEN DESIGN RULES

For optimal plastic design, production and recycling

Demonstrating leadership in the progress towards a circular economy, members of the CGF Plastic Waste Coalition of Action have aligned on Golden Design Rules for packaging design to increase the circularity of their packaging portfolios where appropriate. This set of voluntary, independent and time-bound commitments which together reach over 90% of plastic packaging available on the market will create significant value for the industry and wider system. For more information about the Coalition, visit www.tcgfplasticwaste.com.

1

GOLDEN DESIGN RULE

Increase Value in PET Recycling

- Use transparent and uncoloured **PET** (preferred), or transparent blue or green in all PET bottles[1, 2]
- Ensure material choice, adhesive choice and size of sleeve or label is not problematic for recycling[3, 4, 5]

PET is polyethylene terephthalate, one of the most commonly used plastic materials. This Golden Design Rule applies to all PET bottles in food and non-food applications, including beverages, home care products, personal care products, and more. Switching from coloured to transparent PET bottles will positively impact supply of high quality recycled PET, and helps ensure only materials that have a viable closed loop recycling pathway are used.

THE SCALE

PET bottles represent 13% of plastic packaging on the market, according to data from Plastics Europe and Eunomia.

1) With a minimum L value of 40; 2) Exception: Where barrier protections (for UV light, CO2, or O2) are required for product shelf life and other solutions (e.g., full-body sleeves) are not possible; 3) Including phase out of PETG and PLA labels/sleeves, non-water soluble/dispersible adhesives and sleeves that cover more than 75% of bottle (unless proven not to limit the recyclability of the product); 4) Exception: Unless proven not to limit the recyclability of the product (e.g. cPET, sleeves that detach during recycling processes prior to optical sorting); 5) Exception: Small non-recyclable bottles exempt

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2

GOLDEN DESIGN RULE

Remove Problematic Elements from Packaging

a. No **undetectable**[1] **carbon black**[2]
b. No **PVC** or **PVDC**[2, 3]
c. No **EPS** or **PS**[2]
d. No **PETG** in rigid plastic packaging[2, 3]
e. No **oxo-degradable**[4]

Undetectable carbon black is undetectable in the sorting process when using Near Infra-Red (NIR) technology, which is widely used in plastics recycling systems. As a result, dark-coloured packaging commonly ends up as residue and is disposed of in landfill or incineration. It is commonly used in meat and vegetable trays and bottles. As well as minimising avoidable environmental impacts, removing carbon black would help increase the volume of recycled plastic.

PVC or PVDC is polyvinylidene chloride or polyvinylidene dichloride. It can be problematic if in the recycling stream by disrupting the recycling of some other plastics. It is found in several types of plastic packaging, including meat trays, plastic film around vegetables or blister packs.

EPS or PS is expanded polystyrene or polystyrene. (E)PS is too uncommon the packaging materials stream to make recycling economically viable. As a result, it is rarely sorted from household waste and recycled, with the majority of it incinerated or landfilled. Examples of its application are food takeaway containers, yoghurt pots, and cushioning/filler. This element of Golden Design Rule 2 excludes other types of polystyrene such as SAN or ABS.

PETG is polyethylene terephthalate, and is a contaminant in the PET recycling stream which lowers the value of recycled PET materials. It is found in, for example, drinking bottles and cooking oil containers. This element applies to all single-use rigid packaging materials in the consumer goods market.

Finally, **oxo-degradable** plastics contribute to microplastic pollution and are not suited for long-term reuse, recycling at scale or composting. Uses include shrink and stretch film, carrier bags, blister packs, bottles, labels and caps. This element of Golden Design Rule 2 applies to all oxo-degradable plastics as defined by CEN, the European Standards authority, unless use is required by law.

THE SCALE

According to the Ellen MacArthur Foundation, these problematic elements are present in over 10% of plastic packaging.

1) Undetectable means by commonly used sortation technologies; 2) Exception: This rule does not apply to small non-recyclable packs; 3) Exception: Except in medical applications where there is no alternative; 4) Exception: Except where legally required; "This rule does not apply to oxo-biodegradable plastics"

3

GOLDEN DESIGN RULE

Eliminate Excess Headspace

- Eliminate excess headspace for all flexible pack types, such that the maximum headspace is 30% or less across the product categories outlined in the rule.

This Golden Design Rule applies to the following categories: cleaning products, confectionary, dry groceries, frozen foods & ice-cream, health & wellness, personal & baby care, pet food, produce & fresh food, shelf stable foods, water & beverages**.** By eliminating **excess headspace** in flexible packaging, companies reduce the demand for virgin plastic and reduce the absolute amount of plastic being placed on to the market.

4

GOLDEN DESIGN RULE

Reduce Plastic Overwraps

- Reduce plastic overwraps by only using them when "necessary" (as defined by the developed guideline)

This Golden Design Rule applies to the following categories:

- Food: confectionary, crisps and snacks, canned and tinned food, beverages.
- Non-food: home care, personal care, baby care

By removing unnecessary **overwraps**, companies reduce the demand for virgin plastic and reduce the absolute amount of plastic being placed on to the market.

5

GOLDEN DESIGN RULE

Increase Recycling Value for PET Thermoformed Trays and Other PET Thermoformed Packaging

For PET thermoformed trays and other PET thermoformed packaging:

1. Regional design guidelines to fit with existing recycling programs[1] shall be met wherever possible.
2. For packaging that is not accepted by existing recycling programmes, and where there is a clear pathway for a future recycling system by 2025[2], the following requirements apply:
   A Use transparent and uncoloured (preferred), or transparent blue or green PET[3]
   B Ensure material choice, adhesive choice, inks and size of sleeve or label is not problematic for recycling[4]
   C Use only mono-material PET[5]
   D Use minimal or moderate direct printing[6]
   E Ensure material choice and adhesive choice of lidding films, inserts or other components is not problematic for recycling[7]

PET trays are not currently recycled at scale but solutions are being scaled-up in Europe and North America – a rule to increase recyclability would provide a boost to emerging recycling infrastructure and increase the quantity and availability of rPET which is necessary to meet targets around recycled content[3]

This rule is aligned with published retailer guidelines and third-party guidelines such as APR, RecyClass / PetCore and WRAP.

THE SCALE

If adopted industry-wide, a rule on PET trays and other thermoformed PET packaging would affect >3% of the total plastic packaging market.*

1) Recycling programmes are at different stages of development in different regions, so companies are recommended to check regional advice or guidelines such as those provided by APR in the US. Signatories should use the exceptions reporting process to record cases where they have followed regional design guidelines instead of the Golden Design Rules. 2) As accepted by industry associations and multi-stakeholder value-chain initiatives such as RecyClass/PetCore and Plastics Pacts and targeting recycling rates of >30%. 3) With an L-value of 40; Do not use fillers that affect clarity; coatings should not lead to misdetection of the packaging and misdirection to waste.
4) Including phase out of paper labels and PETG, PVC and PLA labels/sleeves, and non-water soluble/dispersible adhesives. Labels/sleeves should not lead to misdetection of the packaging and misdirection to waste. 5) Including minimum 95% PET content with an intrinsic viscosity that is suitable for the recycling programme in region. Do not use materials that have a negative impact on rPET clarity. 6) E.g. production date or expiry date; Where additional printing is necessary, use of labels is preferred. If this is not possible, use only inks that do not bleed. 7) Lidding films, inserts and other components should not lead to the misdetection of the main packaging, and if using non-PET polymers, density should be <1g/cm3.

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6

GOLDEN DESIGN RULE

Increase Recycling Value in Flexible Consumer Packaging

For flexible consumer packaging made mostly from plastic[1]:

1. Regional design guidelines to fit with existing recycling programmes[2] shall be met wherever possible.
2. For packaging that is not accepted by existing recycling programs, and where there is a clear pathway for a future recycling system by 20253, the following requirements apply:
   A. Maximise polyolefin content:
   B. Preferably >90% mono PE, or >90% mono PP
   C. Minimum either >80% mono PE, >80% mono PP or >80% mixed polyolefins
   D. Density <1 g/cm^3
   E. Each barrier layer should not exceed 5% of the total packaging structure weight[4]
   F. No PVC, PVDC, fibres, aluminium foil, PET

Demand for **flexible packaging** is expected to increase with increasing demand for convenience food and online retailing.

Consumer flexible plastic packaging is not currently recycled in practice or at scale, however there are multiple efforts underway to improve collection, sorting and recycling systems to recycle flexible materials.

All consumer flexible packaging made mostly from plastic:

- 'Consumer' packaging is packaging likely to end up either in the household waste stream or disposed of by consumers during consumption outside the home
- 'Flexible' packaging is packaging that does not keep its shape when moved or emptied.
- 'Made mostly from plastic' defined as packaging made from >50% plastic (i.e. where plastic is the predominant material)

THE SCALE

Flexible plastic packaging makes up an estimated 51% of the total plastic packaging market.*

1) 'Mostly from plastic' defined as packaging which is > 50% plastic (based on EU recognised definition of a 'predominant' material). This rule does not cover compostable plastic packaging that meets accepted certification standards for compostability.
2) Recycling programmes are at different stages of development in different regions, so companies are recommended to check regional advice or guidelines such as those provided by APR in the US. Signatories should use the exceptions reporting process to record cases where they have followed regional design guidelines instead of the Golden Design Rules.
3) As accepted by industry associations and multi-stakeholder value-chain initiatives such as CEFLEX and Plastics Pacts and targeting recycling rates of > 30%.
4) Only use barrier layers and barrier coatings proven not to limit the recyclability of the packaging. AlOx, SiOx, EVOH and PVOH are recommended. Excess outer metallisation (as a barrier or for decoration) could lead to misdetection of the packaging and misdirection to waste.
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7

GOLDEN DESIGN RULE

Increase Recycling Value in Rigid HDPE and PP

For all rigid HDPE and PP packaging:

a. For all labels, ensure material choice, adhesive choice, inks and size is not problematic for recycling[1]
b. Use minimal or moderate direct printing[2]
c. For closures, ensure material choice, liners and seals are not problematic for recycling
d. Do not use fillers that increase the density of the packaging to >1g/cm^3

The rule applies to **all rigid HDPE and PP packaging,** including bottles and squeeze tubes.

Rigid HDPE and PP packaging is recycled in practice and at scale in many markets[2], but there is significant scope for increasing value in recycling and increasing availability and quantity of recycled material[3]

THE SCALE

If adopted industry-wide, this rule would affect 20% of the total plastic packaging market.*

1) Including phase out of paper labels, and PET, PETG, PLA and PVC labels/sleeves; and non-water soluble/dispersible adhesives. Labels/sleeves should not lead to misdetection of the packaging and misdirection to waste. For in-mould labelling use only polyolefins.
2) E.g. production or expiry date. Where additional printing is necessary, use of labels is preferred. If this is not possible, use only inks that do not bleed or which are proven not to limit recyclability.
3) Including phase out of silicone valves, and PVC and silicone seals; PS and PVC; and steel and aluminium caps. Closures should not lead to the misdetection of the packaging and misdirection to waste.
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8

GOLDEN DESIGN RULE

Reduce Virgin Plastic Use in Business-to-Business Plastic Packaging

Reduce the use of virgin plastic in business-business (B2B) plastic packaging[1] in a way that is environmentally beneficial by:

a. Eliminating unnecessary plastic (defined as unnecessary if it can be removed without compromising supply chain/operational efficiencies)
b. Using post-consumer recycled content (where plastic is necessary)
c. Switching to reuse models or alternative materials

- This segment of the packaging market generally does not require food-grade plastics or barrier properties so can be well suited to the use of recycled plastics or substitute materials
- Reusable alternatives to single-use packaging are available (See EMF Upstream Innovation Guide for examples of reuse models for this packaging segment)
- Reducing the use of virgin plastic through elimination, use of recycled content and reuse models could lead to a lower environmental impact from both a waste and GHG emissions perspective if done in an environmentally net beneficial way

The intended scope of this rule is to cover all plastic packaging that does not reach the consumer (as distinct from rule 4 on overwraps). This means all packaging that does not end up either in the household waste stream or is disposed of by consumers during consumption outside the home. This could include, but is not limited to:

- Packaging that is additional to the consumer packaging, and that may be used for protection and collation of individual units during storage, transport and distribution, and to display primary packs on shelf;
- Transportation packaging, including pallets, slip sheets, and stretch wrap used for the shipment and distribution of goods.

Notes: 1) The intended scope of this rule is to cover all plastic packaging that does not reach the consumer, as distinct from rule 4 on overwraps. This means all packaging all packaging that does not end up either in the household waste stream or is disposed of by consumers during consumption outside the home

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9

GOLDEN DESIGN RULE

Use On-Pack Recycling Instructions

Include recycling or reuse instructions on consumer plastic packaging[1]

A high-level rule allows companies to implement the rule according to what is possible in different markets.

Consumers have a key role to play in ensuring packaging is sorted for the appropriate end-of-life solution; clear and accurate on-pack recycling instructions can increase the chances that this role is fulfilled.

There are a growing number of initiatives developing guidelines for on-pack recycling instructions working towards a standardised and accurate way of communicating recycling and reuse instructions to consumers in different markets.

The scope: All consumer plastic packaging: 'Consumer' packaging is packaging likely to end up either in the household waste stream or disposed of by consumers during consumption outside the home

Notes: 1) Instructions should reflect the local conditions. Companies should continue to work at the local level to determine the most accurate way to reflect this in each country